

## SEATTLE URBAN FORESTRY COMMISSION

Weston Brinkley (Position #3 – University), Chair • Sarah Rehder (Position #4 – Hydrologist), Vice-chair  
Steve Zemke (Position #1 – Wildlife Biologist) • Elby Jones (Position #2 – Urban Ecologist - ISA)  
Stuart Niven (Position #5 – Arborist – ISA) • Michael Walton (Position #6 – Landscape Architect – ISA)  
Joshua Morris (Position #7 – NGO) • Blake Voorhees (Position # 9 – Realtor)  
Neeiyati Johnson (Position #10 – Get Engaged) • Whit Bouton (Position #11 – Environmental Justice - ISA)  
Jessica Jones (Position # 12 – Public Health) • Shari Selch (Position # 13 – Community/Neighborhood)

*The Urban Forestry Commission was established to advise the Mayor and City Council concerning the establishment of policy and regulations governing the protection, management, and conservation of trees and vegetation in the City of Seattle*

### Meeting notes

August 12, 2020, 3:00 p.m. – 5:00 p.m.

Via Skype call

(206) 386-1200 or (206) 684-5900

Conference ID: 13768128

*In-person attendance is currently prohibited per the Washington Governor's Proclamation No. 20-05. Meeting participation is limited to access by telephone conference line.*

### Attending

#### Commissioners

Weston Brinkley – Chair  
Sarah Rehder - Vice-Chair  
Elby Jones  
Jessica Jones  
Julia Michalak (non-voting)  
Josh Morris  
Stuart Niven  
Shari Selch  
Blake Voorhees  
Steve Zemke

#### Staff

Sandra Pinto de Bader - OSE

#### Guests

Earl Eutsler – Washington, DC

#### Public

Jim Davis – The Last 6,000  
Vicki Pardee  
Jessica Dixon-Horton – Plant Amnesty

#### Absent- Excused

Whit Bouton  
Neeiyati Johnson  
Michael Walton

**NOTE: Meeting notes are not exhaustive. For more details, listen to the digital recording of the meeting at: <http://www.seattle.gov/urbanforestrycommission/meetingdocs.htm>**

### Call to order

Weston called the meeting to order and did roll call.

### Public comment

Jim Davis – He has received a lot of input from people about trees being cut down. He suggests submitting case studies to see if things would be different with the new Director's Rule. He can provide those studies to see how things actually play out.

### **Washington, DC urban forestry program: tree removal permit and fee-in-lieu**

Earl Eutsler works in the DC Department of Transportation and tree management is centralized there. His responsibilities include direct management of public trees and regulation of private tree removal. In 2019 they planted 8,000 trees, pruned 15,000, and removed 3,500. They received 15,000 requests for service.

DC has 703,000 residents; 2.5 million trees and currently has 38.7% canopy cover (their goal is to reach 40% by 2032).

The Urban forest Preservation Act of 2002:

- Regulates the removal of trees 44" – 100" circumference (14" – 31" in diameter), which are referred to as Special Trees.
- Prevents removal of non-hazardous trees larger than 100" circumference (31" diameter), which are referred to as Heritage Trees.

Fee and fine schedule:

- Hazardous Special and Heritage trees: no fee
- Non-hazardous Special Trees: \$55 per inch of circumference fee
- Special and/or Heritage Trees: \$300 per inch of circumference fine

The intent is to preserve (and ultimately expand) tree canopy over time by replacing a single tree with multiple new plantings. In the 15 years since enactment, 5,194 non-hazardous trees have been removed. Over the same 15-year period, 2,507 hazardous trees have been removed.

Their Tree Fund contributions range from \$148,573 (in 2012) to \$1,875,297 in 2019. They have a special tree replacement program in place in partnership with non-profit Casey Trees. They make Special and Heritage Tree replacement free and make all private tree planting free.

In the 10-year period between 2006 and 2015, only 18 out of 296 districts experienced a net loss in tree canopy. In that same 10-year period, all eight wards experienced a net increase in tree canopy.

Please note that meeting notes are not exhaustive. For discussion details, especially the Q&A section of the presentation, please listen to the meeting digital recording at:

<http://www.seattle.gov/urbanforestrycommission/meetingdocs.htm>

### **Draft tree protection Director's Rule update - discussion**

The group discussed the letter and proposed amendments.

**ACTION: A motion to approve the letter as amended was made, seconded, and approved.**

**Director's Rule 11-2020: Landscaping Standards and Green Factor** – move to next meeting

**Planning Commission, Comp Plan and Trees/ Master Builders Advocacy effort on SDCI's Director's Rule** – move to next meeting along with thank you letter to Earl and

**Public comment: None**

None

**Adjourn:**

Weston adjourned the meeting.

**Public input: (see next page and posted notes)**

From: Writekm@everyactioncustom.com <Writekm@everyactioncustom.com>  
Sent: Friday, August 7, 2020 1:00 AM  
To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

I have read and agree with the following letter:

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCI is no longer concerned about the fate of the smaller, non-exceptional trees.
- Protect red alders, black cottonwoods, and bitter cherries. These native trees provide important resources to birds and other wildlife and contribute to our sense of place in Seattle. Following the "right tree, right place" philosophy, these native trees can safely thrive and should be protected like other species.
- Expand the definition of tree groves to stands of six or more trees at least six inches in diameter, including street trees. Tree groves provide important habitat for birds and are becoming less common outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove.
- Require public notice postings on development site and online for removal of Exceptional trees, even when hazardous, to ensure community members know when and where legal tree removal is occurring.
- Require replacement for trees removed from groves and removed hazard trees.
- Align SDCI's proposed Tree Care Provider Acknowledgement with SDOT's Tree Service Provider Registration. Do not automatically renew this form annually. It should be updated each year. Reduce the number of infractions tree service providers can incur in a year before they are removed from the City's list to do business from more than three infractions to more than two infractions.
- Section 4: Preference for planting off-site replacement trees on public property is restrictive. The Director should be able to allow replacement trees not only on public property, but also on private

property, where desired by the property owner, in order to meet the City's goals and objectives of race and social justice under Seattle's Equity and Environment Initiative.

The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
Karen Millward  
7041 16th Ave NW Seattle, WA 98117-5549 Writekm@aol.com

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From: joanel@everyactioncustom.com <joanel@everyactioncustom.com>

Sent: Friday, August 7, 2020 1:02 AM

To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

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Sincerely,  
 Angeline Johnson  
 PO Box 17932 Seattle, WA 98127-1932  
 joanel@umich.edu

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From: brendan.drummey@everyactioncustom.com <brendan.drummey@everyactioncustom.com>  
 Sent: Friday, August 7, 2020 1:09 AM  
 To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
 Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

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Sincerely,  
 Brendan Drummey  
 207 20th Ave Seattle, WA 98122-5810  
 brendan.drummey@gmail.com

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From: cerberus333@everyactioncustom.com <cerberus333@everyactioncustom.com>  
 Sent: Friday, August 7, 2020 1:40 AM  
 To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
 Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

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Sincerely,  
 Hiram Wells  
 5711 40th Ave NE Seattle, WA 98105-2218 cerberus333@comcast.net

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From: maureenneitz1@everyactioncustom.com <maureenneitz1@everyactioncustom.com>  
 Sent: Friday, August 7, 2020 6:39 AM  
 To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
 Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

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Sincerely,  
Maureen Neitz  
2025 Fairview Ave E Seattle, WA 98102-3587 maureenneitz1@gmail.com

From: pmwolfram@everyactioncustom.com <pmwolfram@everyactioncustom.com>  
Sent: Friday, August 7, 2020 7:06 AM  
To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

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Sincerely,  
patricia wolfram  
1728 1/2 N 125th St Seattle, WA 98133-7721 pmwolfram@gmail.com

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From: ltickman@everyactioncustom.com <ltickman@everyactioncustom.com>  
Sent: Friday, August 7, 2020 7:23 AM  
To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

Although I no longer live in Seattle proper, I continue to go there to birdwatch and spend money. As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

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Sincerely,  
 Elizabeth Tickman  
 4617 233rd Ave SE Sammamish, WA 98075-6800 ltickman@yahoo.com

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From: franseepants@everyactioncustom.com <franseepants@everyactioncustom.com>  
 Sent: Friday, August 7, 2020 7:32 AM  
 To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
 Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

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Sincerely,  
frances kenny  
2507 S Horton St Seattle, WA 98144-6528 franseepants@me.com

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From: erikaharris@everyactioncustom.com <erikaharris@everyactioncustom.com>  
Sent: Friday, August 7, 2020 7:36 AM  
To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

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- Align SDCI's proposed Tree Care Provider Acknowledgement with SDOT's Tree Service Provider Registration. Do not automatically renew this form annually. It should be updated each year. Reduce the number of infractions tree service providers can incur in a year before they are removed from the City's list to do business from more than three infractions to more than two infractions.
- Section 4: Preference for planting off-site replacement trees on public property is restrictive. The Director should be able to allow replacement trees not only on public property, but also on private property, where desired by the property owner, in order to meet the City's goals and objectives of race and social justice under Seattle's Equity and Environment Initiative.

The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
Erika Harris  
2515 E Spring St Seattle, WA 98122-4957 erikaharris@gmail.com

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From: jdilworth839@everyactioncustom.com <jdilworth839@everyactioncustom.com>  
Sent: Friday, August 7, 2020 8:14 AM  
To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCI is no longer concerned about the fate of the smaller, non-exceptional trees.
- Protect red alders, black cottonwoods, and bitter cherries. These native trees provide important resources to birds and other wildlife and contribute to our sense of place in Seattle. Following the "right tree, right place" philosophy, these native trees can safely thrive and should be protected like other species.
- Expand the definition of tree groves to stands of six or more trees at least six inches in diameter, including street trees. Tree groves provide important habitat for birds and are becoming less common outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove.
- Require public notice postings on development site and online for removal of Exceptional trees, even when hazardous, to ensure community members know when and where legal tree removal is occurring.
- Require replacement for trees removed from groves and removed hazard trees.
- Align SDCI's proposed Tree Care Provider Acknowledgement with SDOT's Tree Service Provider Registration. Do not automatically renew this form annually. It should be updated each year. Reduce the number of infractions tree service providers can incur in a year before they are removed from the City's list to do business from more than three infractions to more than two infractions.
- Section 4: Preference for planting off-site replacement trees on public property is restrictive. The Director should be able to allow replacement trees not only on public property, but also on private property, where desired by the property owner, in order to meet the City's goals and objectives of race and social justice under Seattle's Equity and Environment Initiative.

The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,

Janice Dilworth

5600 Kirkwood Pl N Seattle, WA 98103-5964 [jdilworth839@gmail.com](mailto:jdilworth839@gmail.com)

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From: kgylland@everyactioncustom.com <kgylland@everyactioncustom.com>

Sent: Friday, August 7, 2020 8:43 AM

To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city. I live in the Pinehurst neighborhood and trees are being cut down at an alarming rate. Our eco system needs protection now.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCI is no longer concerned about the fate of the smaller, non-exceptional trees.
- Protect red alders, black cottonwoods, and bitter cherries. These native trees provide important resources to birds and other wildlife and contribute to our sense of place in Seattle. Following the "right tree, right place" philosophy, these native trees can safely thrive and should be protected like other species.
- Expand the definition of tree groves to stands of six or more trees at least six inches in diameter, including street trees. Tree groves provide important habitat for birds and are becoming less common outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove.
- Require public notice postings on development site and online for removal of Exceptional trees, even when hazardous, to ensure community members know when and where legal tree removal is occurring.
- Require replacement for trees removed from groves and removed hazard trees.
- Align SDCI's proposed Tree Care Provider Acknowledgement with SDOT's Tree Service Provider Registration. Do not automatically renew this form annually. It should be updated each year. Reduce the number of infractions tree service providers can incur in a year before they are removed from the City's list to do business from more than three infractions to more than two infractions.
- Section 4: Preference for planting off-site replacement trees on public property is restrictive. The Director should be able to allow replacement trees not only on public property, but also on private property, where desired by the property owner, in order to meet the City's goals and objectives of race and social justice under Seattle's Equity and Environment Initiative.

The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
Kathleen Gylland  
11055 20th Ave NE Seattle, WA 98125-6551 kgylland@netzero.net

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From: dsnow@everyactioncustom.com <dsnow@everyactioncustom.com>  
Sent: Friday, August 7, 2020 8:51 AM  
To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCI is no longer concerned about the fate of the smaller, non-exceptional trees.
- Protect red alders, black cottonwoods, and bitter cherries. These native trees provide important resources to birds and other wildlife and contribute to our sense of place in Seattle. Following the "right tree, right place" philosophy, these native trees can safely thrive and should be protected like other species.
- Expand the definition of tree groves to stands of six or more trees at least six inches in diameter, including street trees. Tree groves provide important habitat for birds and are becoming less common outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove.
- Require public notice postings on development site and online for removal of Exceptional trees, even when hazardous, to ensure community members know when and where legal tree removal is occurring.
- Require replacement for trees removed from groves and removed hazard trees.

- Align SDCI's proposed Tree Care Provider Acknowledgement with SDOT's Tree Service Provider Registration. Do not automatically renew this form annually. It should be updated each year. Reduce the number of infractions tree service providers can incur in a year before they are removed from the City's list to do business from more than three infractions to more than two infractions.
- Section 4: Preference for planting off-site replacement trees on public property is restrictive. The Director should be able to allow replacement trees not only on public property, but also on private property, where desired by the property owner, in order to meet the City's goals and objectives of race and social justice under Seattle's Equity and Environment Initiative.

Also when the trees are planted put water bags around them and water them. Recently planted trees have died and are dying in some parks because they are not getting watered, a big waste of my tax dollars.

The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
Doreen Snow  
2617 Queen Anne Ave N Seattle, WA 98109-1822 dsnow@cablespeed.com

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From: st34uv5@everyactioncustom.com <st34uv5@everyactioncustom.com>  
Sent: Friday, August 7, 2020 8:52 AM  
To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

First of all, thank you very much for all of your hard work and dedication to the city of Seattle.

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city. Let's uphold the honor to be known as The Emerald City for good reason.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

However, the proposed rule can be strengthened in the following ways:

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCI is no longer concerned about the fate of the smaller, non-exceptional trees.

- Protect red alders, black cottonwoods, and bitter cherries. These native trees provide important resources to birds and other wildlife and contribute to our sense of place in Seattle. Following the "right tree, right place" philosophy, these native trees can safely thrive and should be protected like other species.
- Expand the definition of tree groves to stands of six or more trees at least six inches in diameter, including street trees. Tree groves provide important habitat for birds and are becoming less common outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove.
- Require public notice postings on development site and online for removal of Exceptional trees, even when hazardous, to ensure community members know when and where legal tree removal is occurring.
- Require replacement for trees removed from groves and removed hazard trees.
- Align SDCI's proposed Tree Care Provider Acknowledgement with SDOT's Tree Service Provider Registration. Do not automatically renew this form annually. It should be updated each year. Reduce the number of infractions tree service providers can incur in a year before they are removed from the City's list to do business from more than three infractions to more than two infractions.
- Section 4: Preference for planting off-site replacement trees on public property is restrictive. The Director should be able to allow replacement trees not only on public property, but also on private property, where desired by the property owner, in order to meet the City's goals and objectives of race and social justice under Seattle's Equity and Environment Initiative.

The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Thank you very much for your time and consideration. I truly appreciate it.

Sincerely,

Crystal Perez

2636 NW 63rd St Unit A Seattle, WA 98107-2453 st34uv5@gmail.com

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From: adam.charles.rose@everyactioncustom.com <adam.charles.rose@everyactioncustom.com>

Sent: Friday, August 7, 2020 8:59 AM

To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city. This is especially important in South Seattle - a part of our city that lacks green spaces and the positive health benefits that they bring.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCI is no longer concerned about the fate of the smaller, non-exceptional trees.
- Protect red alders, black cottonwoods, and bitter cherries. These native trees provide important resources to birds and other wildlife and contribute to our sense of place in Seattle. Following the "right tree, right place" philosophy, these native trees can safely thrive and should be protected like other species.
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The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
ADAM ROSE  
4931 43rd Ave S Seattle, WA 98118-2002  
adam.charles.rose@gmail.com

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From: markforcalquier@everyactioncustom.com <markforcalquier@everyactioncustom.com>  
Sent: Friday, August 7, 2020 9:04 AM

To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

I am a supporter of Seattle Audubon so protecting Seattle's urban forest is important to me. I have carefully read their "pre-set" message and want to express my support just for the areas that I am in full agreement. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCI is no longer concerned about the fate of the smaller, non-exceptional trees.
- Protect red alders, black cottonwoods, and bitter cherries. These native trees provide important resources to birds and other wildlife and contribute to our sense of place in Seattle. Following the "right tree, right place" philosophy, these native trees can safely thrive and should be protected like other species.
- Expand the definition of tree groves to stands of six or more trees at least six inches in diameter, including street trees. Tree groves provide important habitat for birds and are becoming less common outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove.
- Align SDCI's proposed Tree Care Provider Acknowledgement with SDOT's Tree Service Provider Registration. Do not automatically renew this form annually. It should be updated each year. Reduce the number of infractions tree service providers can incur in a year before they are removed from the City's list to do business from more than three infractions to more than two infractions.

The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
Mark Smith

12720 Dayton Ave N Seattle, WA 98133-7915 markforcalquier@gmail.com

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From: DIANALAW@everyactioncustom.com <DIANALAW@everyactioncustom.com>

Sent: Friday, August 7, 2020 9:11 AM

To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

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- Protect red alders, black cottonwoods, and bitter cherries. These native trees provide important resources to birds and other wildlife and contribute to our sense of place in Seattle. Following the "right tree, right place" philosophy, these native trees can safely thrive and should be protected like other species.
- Expand the definition of tree groves to stands of six or more trees at least six inches in diameter, including street trees. Tree groves provide important habitat for birds and are becoming less common outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove.
- Require public notice postings on development site and online for removal of Exceptional trees, even when hazardous, to ensure community members know when and where legal tree removal is occurring.
- Require replacement for trees removed from groves and removed hazard trees.
- Align SDCI's proposed Tree Care Provider Acknowledgement with SDOT's Tree Service Provider Registration. Do not automatically renew this form annually. It should be updated each year. Reduce the number of infractions tree service providers can incur in a year before they are removed from the City's list to do business from more than three infractions to more than two infractions.
- Section 4: Preference for planting off-site replacement trees on public property is restrictive. The Director should be able to allow replacement trees not only on public property, but also on private property, where desired by the property owner, in order to meet the City's goals and objectives of race and social justice under Seattle's Equity and Environment Initiative.

The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
Diana Law  
26036 14th Ave S Des Moines, WA 98198-9117 DIANALAW@HOTMAIL.COM

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From: lisa@everyactioncustom.com <lisa@everyactioncustom.com>  
Sent: Friday, August 7, 2020 9:19 AM  
To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCI is no longer concerned about the fate of the smaller, non-exceptional trees.
- Protect red alders, black cottonwoods, and bitter cherries. These native trees provide important resources to birds and other wildlife and contribute to our sense of place in Seattle. Following the "right tree, right place" philosophy, these native trees can safely thrive and should be protected like other species.
- Expand the definition of tree groves to stands of six or more trees at least six inches in diameter, including street trees. Tree groves provide important habitat for birds and are becoming less common outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove.
- Require public notice postings on development site and online for removal of Exceptional trees, even when hazardous, to ensure community members know when and where legal tree removal is occurring.
- Require replacement for trees removed from groves and removed hazard trees.

- Align SDCI's proposed Tree Care Provider Acknowledgement with SDOT's Tree Service Provider Registration. Do not automatically renew this form annually. It should be updated each year. Reduce the number of infractions tree service providers can incur in a year before they are removed from the City's list to do business from more than three infractions to more than two infractions.
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The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
 Lisa Arnold  
 6716 30th Ave NW Seattle, WA 98117-6226 lisa@gtarnold.com

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From: tae.mclaughlin@everyactioncustom.com <tae.mclaughlin@everyactioncustom.com>  
 Sent: Friday, August 7, 2020 9:21 AM  
 To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
 Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCI is no longer concerned about the fate of the smaller, non-exceptional trees.
- Protect red alders, black cottonwoods, and bitter cherries. These native trees provide important resources to birds and other wildlife and contribute to our sense of place in Seattle. Following the "right tree, right place" philosophy, these native trees can safely thrive and should be protected like other species.
- Expand the definition of tree groves to stands of six or more trees at least six inches in diameter, including street trees. Tree groves provide important habitat for birds and are becoming less common

outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove.

- Require public notice postings on development site and online for removal of Exceptional trees, even when hazardous, to ensure community members know when and where legal tree removal is occurring.
- Require replacement for trees removed from groves and removed hazard trees.
- Align SDCI's proposed Tree Care Provider Acknowledgement with SDOT's Tree Service Provider Registration. Do not automatically renew this form annually. It should be updated each year. Reduce the number of infractions tree service providers can incur in a year before they are removed from the City's list to do business from more than three infractions to more than two infractions.
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The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,

Tae Yamasaki McLaughlin

821 23rd Ave Apt 2 Seattle, WA 98122-4851 tae.mclaughlin@gmail.com

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From: cindykru@everyactioncustom.com <cindykru@everyactioncustom.com>

Sent: Friday, August 7, 2020 9:22 AM

To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees

greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCI is no longer concerned about the fate of the smaller, non-exceptional trees.

- Protect red alders, black cottonwoods, and bitter cherries. These native trees provide important resources to birds and other wildlife and contribute to our sense of place in Seattle. Following the "right tree, right place" philosophy, these native trees can safely thrive and should be protected like other species.
- Expand the definition of tree groves to stands of six or more trees at least six inches in diameter, including street trees. Tree groves provide important habitat for birds and are becoming less common outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove.
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- Align SDCI's proposed Tree Care Provider Acknowledgement with SDOT's Tree Service Provider Registration. Do not automatically renew this form annually. It should be updated each year. Reduce the number of infractions tree service providers can incur in a year before they are removed from the City's list to do business from more than three infractions to more than two infractions.
- Section 4: Preference for planting off-site replacement trees on public property is restrictive. The Director should be able to allow replacement trees not only on public property, but also on private property, where desired by the property owner, in order to meet the City's goals and objectives of race and social justice under Seattle's Equity and Environment Initiative.

The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
Cindy Krueger  
2848 NW 72nd St Seattle, WA 98117-6251  
cindykru@yahoo.com

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From: carita.polin@everyactioncustom.com <carita.polin@everyactioncustom.com>  
Sent: Friday, August 7, 2020 9:41 AM  
To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

First of all, thank you for all you are doing to address the multiple crises our city and country are facing. You are having to act as first responders.

I am sure you have received many copies of the suggestions in the form letter below. Here are my personal thoughts: I live in Wallingford, which has open space, street trees (some planted by me with the help of a city grant 20 years ago) backyard trees and parks- all of which have added to my quality of life, especially in the Time of Covid.

The presence of the natural environment is one of the privileges of white and affluent citizens that has been highlighted in the recent news coverage of racial and economic inequities. Trees (and their wild inhabitants) create oases of shade and lower temperatures on city streets, soften harsh landscapes, and improve air quality. I take them for granted until I am in a setting that doesn't have them. They have an enormous impact on my state of wellbeing, and studies have shown that patients recover more quickly when they have a view of the natural environment from their hospital beds.

My 96 year old mother just spent her last quarantined months of life comforted by the trees and the birds at the feeder outside the window of her retirement home.

Trees are an investment in quality of life, worth protecting for all neighborhoods.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees.
- Protect red alders, black cottonwoods, and bitter cherries. These native trees provide important resources to birds and other wildlife and contribute to our sense of place in Seattle. Following the "right tree, right place" philosophy, these native trees can safely thrive and should be protected like other species.
- Expand the definition of tree groves to stands of six or more trees at least six inches in diameter, including street trees. Tree groves provide important habitat for birds and are becoming less common outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove.
- Require public notice postings on development site and online for removal of Exceptional trees, even when hazardous, to ensure community members know when and where legal tree removal is occurring.
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The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
Carita Polin  
4027 Burke Ave N Seattle, WA 98103-8317 carita.polin@gmail.com

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From: nikol@everyactioncustom.com <nikol@everyactioncustom.com>  
Sent: Friday, August 7, 2020 9:49 AM  
To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

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Sincerely,  
 Nichole Stein  
 7725 40th Ave NE Seattle, WA 98115-4927 nikol@nikolstein.com

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From: bishopmarilyn18@everyactioncustom.com <bishopmarilyn18@everyactioncustom.com>  
 Sent: Friday, August 7, 2020 9:57 AM  
 To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
 Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

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outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove.

- Require public notice postings on development site and online for removal of Exceptional trees, even when hazardous, to ensure community members know when and where legal tree removal is occurring.
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Sincerely,  
Marilyn Bishop  
3032 NE 87th St Seattle, WA 98115-3529  
bishopmarilyn18@yahoo.com

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From: sarahgkwan@everyactioncustom.com <sarahgkwan@everyactioncustom.com>  
Sent: Friday, August 7, 2020 10:22 AM  
To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

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greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCI is no longer concerned about the fate of the smaller, non-exceptional trees.

- Protect red alders, black cottonwoods, and bitter cherries. These native trees provide important resources to birds and other wildlife and contribute to our sense of place in Seattle. Following the "right tree, right place" philosophy, these native trees can safely thrive and should be protected like other species.
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The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
Sarah Kwan  
6019 30th Ave S Seattle, WA 98108-3119  
sarahgkwan@gmail.com

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From: boylefallon@everyactioncustom.com <boylefallon@everyactioncustom.com>  
Sent: Friday, August 7, 2020 10:26 AM  
To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

While stuck at home during this pandemic, I've had to live through listening to the pounding of 4 townhomes being built on the lot next to me, but I've also had the pleasure of spending more time in my small back yard listening to and watching the local birds! In fact, a family of blue jays had a nest of baby

jays (born sometime in early April) that are now learning to fly in our back yard. The lot behind my house is now slated for 5 more townhomes, and tragically the trees that the baby blue jays nested in and are learning to fly from is on that lot, and I'm sure it will be torn down in service of fitting 5 units into one lot.

As more and more people want to own residences in Seattle, I understand how important it is to increase housing density, but protecting Seattle's urban forest is a critical part of ensuring that Seattle remains a pleasant place to live. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

The proposed Rule 13-2020 can be strengthened in the following ways:

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCI is no longer concerned about the fate of the smaller, non-exceptional trees.
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- Expand the definition of tree groves to stands of six or more trees at least six inches in diameter, including street trees. Tree groves provide important habitat for birds and are becoming less common outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove. Street trees also provide critical shade for pedestrians which will only become more important due to climate change.
- Require public notice postings on development site and online for removal of Exceptional trees, even when hazardous, to ensure community members know when and where legal tree removal is occurring.
- Require replacement for trees removed from groves and removed hazard trees.
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The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban

Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
Fallon Boyle  
819 NW Market St Seattle, WA 98107-3650 boylefallon@gmail.com

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From: claudiabro@everyactioncustom.com <claudiabro@everyactioncustom.com>

Sent: Friday, August 7, 2020 10:37 AM

To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

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Sincerely,

Claudia Green

18328 94th Ave NE Bothell, WA 98011-3317 claudiabro@yahoo.com

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From: carol@everyactioncustom.com <carol@everyactioncustom.com>

Sent: Friday, August 7, 2020 10:32 AM

To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

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The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
 Carol Hosford  
 174 NW Cascade Dr Shoreline, WA 98177-8000 carol@hosford.biz

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From: rachaelsmclinton@everyactioncustom.com <rachaelsmclinton@everyactioncustom.com>  
 Sent: Friday, August 7, 2020 10:53 AM  
 To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
 Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

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Sincerely,  
 Rachael McClinton  
 2634 Mayfair Ave N Seattle, WA 98109-1850 rachaelmclinton@gmail.com

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From: mirabeau49@everyactioncustom.com <mirabeau49@everyactioncustom.com>  
 Sent: Friday, August 7, 2020 11:00 AM  
 To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
 Subject: Protect our trees - Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

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Sincerely,  
Kathy Shannon  
1732 18th Ave Apt L Seattle, WA 98122-2759 mirabeau49@yahoo.com

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From: iwall@everyactioncustom.com <iwall@everyactioncustom.com>

Sent: Friday, August 7, 2020 11:09 AM

To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

I agree with the recommendation below. My neighbors and I just invested \$500 to hire an arborist to properly prune a majestic black walnut tree on our shared planting strip. I have spent much more over the years to keep large cedar and maples in good health. Other residents do the same but our contributions to the welfare of our shared urban environment are unrecognized. Instead the demands of developers to scrape the earth and build hideous tiny apartment buildings are given the endorsement of city officials including the Council. We are losing the Emerald City in the false pursuit of "affordable housing." It is not a binary choice. People need trees in their neighborhoods, not only in park preserves! A small reduction in citywide development capacity is a small price to pay for the protection of mature trees. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

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- Expand the definition of tree groves to stands of six or more trees at least six inches in diameter, including street trees. Tree groves provide important habitat for birds and are becoming less common outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove.
- Require public notice postings on development site and online for removal of Exceptional trees, even when hazardous, to ensure community members know when and where legal tree removal is occurring.
- Require replacement for trees removed from groves and removed hazard trees.
- Align SDCI's proposed Tree Care Provider Acknowledgement with SDOT's Tree Service Provider Registration. Do not automatically renew this form annually. It should be updated each year. Reduce the number of infractions tree service providers can incur in a year before they are removed from the City's list to do business from more than three infractions to more than two infractions.
- Section 4: Preference for planting off-site replacement trees on public property is restrictive. The Director should be able to allow replacement trees not only on public property, but also on private property, where desired by the property owner, in order to meet the City's goals and objectives of race and social justice under Seattle's Equity and Environment Initiative.

The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
Irene Wall  
207 N 60th St Seattle, WA 98103-5503  
iwall@serv.net

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From: ann@everyactioncustom.com <ann@everyactioncustom.com>  
Sent: Friday, August 7, 2020 11:10 AM  
To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCI is no longer concerned about the fate of the smaller, non-exceptional trees.
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Sincerely,  
Ann Gensler  
424 17th Ave E Seattle, WA 98112-4610  
ann@robertdruckerart.com

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From: shawdennis@everyactioncustom.com <shawdennis@everyactioncustom.com>  
Sent: Friday, August 7, 2020 11:32 AM  
To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

Appreciating the urban forest and its benefits, and the long timescale of tree replacement - I strongly support measures to maintain and enhance Seattle's tree protection. I have been dismayed to see the extent of very large tree removal that has happened in my own neighborhood of Montlake with the SR 520 work- It seems clear to me that many of the very large trees taken down in construction staging areas could have been worked around. Regrowth of any trees planted as replacement will take many decades to resume the iconic stature of those removed.

I would then thank you for your work on proposed Director's Rule 13-2020 and support the Seattle Audubon's suggestions to improve the proposal.

The proposed rule can be strengthened in the following ways:

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCI is no longer concerned about the fate of the smaller, non-exceptional trees.
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tree, right place" philosophy, these native trees can safely thrive and should be protected like other species.

- Expand the definition of tree groves to stands of six or more trees at least six inches in diameter, including street trees. Tree groves provide important habitat for birds and are becoming less common outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove.
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The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
Dennis Shaw  
2023 E Louisa St Seattle, WA 98112-2207 shawdennis@gmail.com

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From: nohealani@everyactioncustom.com <nohealani@everyactioncustom.com>  
Sent: Friday, August 7, 2020 12:01 PM  
To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

My apartment in Seattle is bearable because of nearby trees. Treed parts of the neighborhood are physically and aesthetically highly desirable, while those without trees are undesirable and create a harsh climate. As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

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Sincerely,  
maile johnson  
711 Belmont Pl E Seattle, WA 98102-4420 nohealani@rockisland.com

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From: swestervelt@everyactioncustom.com <swestervelt@everyactioncustom.com>

Sent: Friday, August 7, 2020 12:04 PM

To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

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Sincerely,

Sarah Westervelt  
3016 NE 91st St Seattle, WA 98115-3536  
swestervelt@comcast.net

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From: rt.perbus@everyactioncustom.com <rt.perbus@everyactioncustom.com>  
Sent: Friday, August 7, 2020 12:24 PM  
To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

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Sincerely,  
Randal Ternes  
2125 4th Ave W Seattle, WA 98119-2632  
rt.perbus@gmail.com

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From: loiswoolwine@everyactioncustom.com <loiswoolwine@everyactioncustom.com>  
Sent: Friday, August 7, 2020 12:27 PM  
To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
Subject: Proposed Director's Rule 13-2020

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

Dear Ms. Pinto de Bader:

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

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Sincerely,  
Lois Woolwine  
13508 28th At. NE  
Lake Stevens, WA 98258

Sincerely,  
Lois Woolwine  
13508 28th St NE Lake Stevens, WA 98258-9227 [loiswoolwine@gmail.com](mailto:loiswoolwine@gmail.com)

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From: [florianray@everyactioncustom.com](mailto:florianray@everyactioncustom.com) <[florianray@everyactioncustom.com](mailto:florianray@everyactioncustom.com)>  
Sent: Friday, August 7, 2020 12:58 PM  
To: Pinto de Bader, Sandra <[Sandra.Pinto\\_de\\_Bader@Seattle.gov](mailto:Sandra.Pinto_de_Bader@Seattle.gov)>  
Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

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Sincerely,  
 Florian Raymann  
 3041 NE 91st St Seattle, WA 98115-3535  
 florianray@comcast.net

---

From: etribe@everyactioncustom.com <etribe@everyactioncustom.com>  
 Sent: Friday, August 7, 2020 1:00 PM  
 To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
 Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

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Sincerely,  
Mary Eastman  
1312 NE Wagon Rd Toledo, OR 97391-2278

etribе@charter.net

---

From: vpardee@everyactioncustom.com <vpardee@everyactioncustom.com>

Sent: Friday, August 7, 2020 1:01 PM

To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

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Sincerely,  
Vicki Pardee  
6330 Atlas Pl SW Seattle, WA 98136-1344 vpardee@aol.com

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From: CYNTHIA@everyactioncustom.com <CYNTHIA@everyactioncustom.com>  
Sent: Friday, August 7, 2020 1:33 PM  
To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

I'm a member of Seattle Audubon and would like to thank you for your work on proposed Director's Rule 13-2020. It offers valuable improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

Protecting Seattle's urban forest provides essential services to people and birds in our city.

I believe the proposed rule can be strengthened in the following ways:

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCI is no longer concerned about the fate of the smaller, non-exceptional trees.
- Protect red alders, black cottonwoods, and bitter cherries. These native trees provide important resources to birds and other wildlife and contribute to our sense of place in Seattle. Following the "right tree, right place" philosophy, these native trees can safely thrive and should be protected like other species.
- Expand the definition of tree groves to stands of six or more trees at least six inches in diameter, including street trees. Tree groves provide important habitat for birds and are becoming less common outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove.
- Require public notice postings on development site and online for removal of Exceptional trees, even when hazardous, to ensure community members know when and where legal tree removal is occurring.
- Require replacement for trees removed from groves and removed hazard trees.

- Align SDCI's proposed Tree Care Provider Acknowledgement with SDOT's Tree Service Provider Registration. Do not automatically renew this form annually. It should be updated each year. Reduce the number of infractions tree service providers can incur in a year before they are removed from the City's list to do business from more than three infractions to more than two infractions.
- Section 4: Preference for planting off-site replacement trees on public property is restrictive. The Director should be able to allow replacement trees not only on public property, but also on private property, where desired by the property owner, in order to meet the City's goals and objectives of race and social justice under Seattle's Equity and Environment Initiative.

The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
 CYNTHIA PUTNAM  
 1142 20th Ave E Seattle, WA 98112-3509  
 CYNTHIA@PUTNAMPRICE.COM

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From: luchessas@everyactioncustom.com <luchessas@everyactioncustom.com>  
 Sent: Friday, August 7, 2020 2:19 PM  
 To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
 Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

Thank you for your work on the draft Director's Rule 13-2020. Trees, especially native species, provide important social and ecosystem services, including aesthetically pleasing surroundings, air pollutant removal, sequestering carbon, and food and habitat for fish and wildlife. Native deciduous and coniferous trees are a trademark of the Pacific Northwest and contribute to the high quality of life we enjoy in the Emerald City.

I would propose strengthening the draft Director's Rule can by:

- Please emphasize the importance of maximizing tree retention not only during the development process but always because of the social and ecosystem services they provide, particularly sequestering and storing carbon and improving air quality by amending the purpose and need statement to this effect.
- All native trees, particularly conifers but also red alder, black cottonwood, and bitter cherry should be added to the list of exceptional tree species. It could perhaps be noted that these are important pioneer species in our Pacific Northwest Forests and qualified that they may be taken down if they are determined to be in poor health (i.e., hazard trees) by a qualified arborist
- Remove non-native trees that tend to be invasive from the exceptional tree list, such as *Crataegus monogyna*. Birds eat the berries of this species and contribute to the spread of this species and degradation of native forest communities.

Expand the definition of tree groves to stands of six or more trees at least six inches in diameter, including street trees. Tree groves provide important habitat for birds and are becoming less common outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove.

- Require public notice postings on development site and online for removal of Exceptional trees, even when hazardous, to ensure community members know when and where legal tree removal is occurring.
- Require replacement for trees removed from groves and removed hazard trees.
- Align SDCI's proposed Tree Care Provider Acknowledgement with SDOT's Tree Service Provider Registration. Do not automatically renew this form annually. It should be updated each year. Reduce the number of infractions tree service providers can incur in a year before they are removed from the City's list to do business from more than three infractions to more than two infractions.
- Section 4: Preference for planting off-site replacement trees on public property is restrictive. The Director should be able to allow replacement trees not only on public property, but also on private property, where desired by the property owner, in order to meet the City's goals and objectives of race and social justice under Seattle's Equity and Environment Initiative.

Seattle has done a great job of improving our urban forests through the Green Seattle Partnership. Let's continue to build on improving the long-term health of our urban forests by protecting the trees we already have. Please strengthen the draft Director's Rule as suggested and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
Scott Luchessa  
4013 32nd Ave W Seattle, WA 98199-1652  
luchessas@gmail.com

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From: ELISE.D.EVANS@everyactioncustom.com <ELISE.D.EVANS@everyactioncustom.com>  
Sent: Friday, August 7, 2020 2:42 PM  
To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon and the Beacon Food Forest, protecting Seattle's urban forest is important to me. Trees provide essential services to people such as shade and food, and support over 100 local bird species. People, birds, and other species need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCI is no longer concerned about the fate of the smaller, non-exceptional trees.
- Protect red alders, black cottonwoods, and bitter cherries. These native trees provide important resources to birds and other wildlife and contribute to our sense of place in Seattle. Following the "right tree, right place" philosophy, these native trees can safely thrive and should be protected like other species.
- Expand the definition of tree groves to stands of six or more trees at least six inches in diameter, including street trees. Tree groves provide important habitat for birds and are becoming less common outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove.
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The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
ELISE EVANS  
750 Crockett St Seattle, WA 98109-2411  
ELISE.D.EVANS@GMAIL.COM

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From: hardboll@everyactioncustom.com <hardboll@everyactioncustom.com>  
Sent: Friday, August 7, 2020 3:32 PM  
To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

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The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,

Alan Hardwick  
6312 Atlas Pl SW Seattle, WA 98136-1344 hardboll@quidnunc.net

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From: kim.scott@everyactioncustom.com <kim.scott@everyactioncustom.com>  
Sent: Friday, August 7, 2020 4:11 PM  
To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

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property, where desired by the property owner, in order to meet the City's goals and objectives of race and social justice under Seattle's Equity and Environment Initiative.

The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,

Kim Scott

3440 25th Ave W Apt 301 Seattle, WA 98199-2230 kim.scott@ymail.com

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From: carolsic@everyactioncustom.com <carolsic@everyactioncustom.com>

Sent: Friday, August 7, 2020 4:42 PM

To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

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- Align SDCI's proposed Tree Care Provider Acknowledgement with SDOT's Tree Service Provider Registration. Do not automatically renew this form annually. It should be updated each year. Reduce the number of infractions tree service providers can incur in a year before they are removed from the City's list to do business from more than three infractions to more than two infractions.
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The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
 Carol Sue Ivory-Carline  
 7523 31st Ave NE Seattle, WA 98115-4701 carolsic@umich.edu

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From: sue@everyactioncustom.com <sue@everyactioncustom.com>  
 Sent: Friday, August 7, 2020 4:52 PM  
 To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
 Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCI is no longer concerned about the fate of the smaller, non-exceptional trees.
- Protect red alders, black cottonwoods, and bitter cherries. These native trees provide important resources to birds and other wildlife and contribute to our sense of place in Seattle. Following the "right tree, right place" philosophy, these native trees can safely thrive and should be protected like other species.

- Expand the definition of tree groves to stands of six or more trees at least six inches in diameter, including street trees. Tree groves provide important habitat for birds and are becoming less common outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove.
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The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
sue quigley  
7156 34th Ave SW Seattle, WA 98126-3302 sue@suequigley.com

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From: kdaniels7@everyactioncustom.com <kdaniels7@everyactioncustom.com>  
Sent: Friday, August 7, 2020 4:54 PM  
To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example,

SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCI is no longer concerned about the fate of the smaller, non-exceptional trees.

- Protect red alders, black cottonwoods, and bitter cherries. These native trees provide important resources to birds and other wildlife and contribute to our sense of place in Seattle. Following the "right tree, right place" philosophy, these native trees can safely thrive and should be protected like other species.
- Expand the definition of tree groves to stands of six or more trees at least six inches in diameter, including street trees. Tree groves provide important habitat for birds and are becoming less common outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove.
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The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
Kathryn Daniels  
217 NW 46th St Seattle, WA 98107-4341  
kdaniels7@gmail.com

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From: pokano@everyactioncustom.com <pokano@everyactioncustom.com>  
Sent: Friday, August 7, 2020 5:24 PM  
To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a

healthy, growing, and equitably distributed urban forest to thrive in our city. In addition, as our earth warms, we need trees--preferably large ones--for cooling.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCI is no longer concerned about the fate of the smaller, non-exceptional trees.
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The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
Pamela Okano  
2211 NE 54th St Apt 2D Seattle, WA 98105-3250 pokano@rmlaw.com

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From: saschimke@everyactioncustom.com <saschimke@everyactioncustom.com>  
Sent: Friday, August 7, 2020 5:26 PM  
To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

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The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
Rechelle Schimke  
16523 132nd Pl SE Renton, WA 98058-6979 saschimke@gmail.com

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From: Eatonb4@everyactioncustom.com <Eatonb4@everyactioncustom.com>  
Sent: Friday, August 7, 2020 6:16 PM  
To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

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- Expand the definition of tree groves to stands of six or more trees at least six inches in diameter, including street trees. Tree groves provide important habitat for birds and are becoming less common outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove.
- Require public notice postings on development site and online for removal of Exceptional trees, even when hazardous, to ensure community members know when and where legal tree removal is occurring.
- Require replacement for trees removed from groves and removed hazard trees.

- Align SDCI's proposed Tree Care Provider Acknowledgement with SDOT's Tree Service Provider Registration. Do not automatically renew this form annually. It should be updated each year. Reduce the number of infractions tree service providers can incur in a year before they are removed from the City's list to do business from more than three infractions to more than two infractions.
- Section 4: Preference for planting off-site replacement trees on public property is restrictive. The Director should be able to allow replacement trees not only on public property, but also on private property, where desired by the property owner, in order to meet the City's goals and objectives of race and social justice under Seattle's Equity and Environment Initiative.

The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
 Brett Eaton  
 2769 NW 65th St Unit B Seattle, WA 98117-5959 Eatonb4@gmail.com

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From: estelleshives@everyactioncustom.com <estelleshives@everyactioncustom.com>  
 Sent: Friday, August 7, 2020 6:39 PM  
 To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
 Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCI is no longer concerned about the fate of the smaller, non-exceptional trees.
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Sincerely,  
Estelle Shives  
2633 41st Ave SW Seattle, WA 98116-2512 [estelleshives@gmail.com](mailto:estelleshives@gmail.com)

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From: [gramgary66@everyactioncustom.com](mailto:gramgary66@everyactioncustom.com) <[gramgary66@everyactioncustom.com](mailto:gramgary66@everyactioncustom.com)>  
Sent: Friday, August 7, 2020 7:16 PM  
To: Pinto de Bader, Sandra <[Sandra.Pinto\\_de\\_Bader@Seattle.gov](mailto:Sandra.Pinto_de_Bader@Seattle.gov)>  
Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

Since moving to my property in SE Seattle we have planted 20 trees in our yard along with plenty of shrubs a garden. The birds love it. We also take care of a traffic circle. As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example,

SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCI is no longer concerned about the fate of the smaller, non-exceptional trees.

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The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
Steven Gary  
5124 S Graham St Seattle, WA 98118-2939 gramgary66@gmail.com

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From: frankbackus1@everyactioncustom.com <frankbackus1@everyactioncustom.com>  
Sent: Friday, August 7, 2020 7:51 PM  
To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

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Sincerely,

Frank Backus

450 NE 100th St Apt 624 Seattle, WA 98125-8028 frankbackus1@gmail.com

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From: katiemiles@everyactioncustom.com <katiemiles@everyactioncustom.com>

Sent: Friday, August 7, 2020 8:51 PM

To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

Being raised on a potato farm in Southeastern Idaho, I've never been at ease living in big cities, even though I've lived on and off in Seattle for the last twenty years. Never have I felt less at ease than now, with a construction project that feels like it's on top of my husband and me. They have maximized the square footage allowable on the lot. They've shaved it of all of its trees and shrubs. That's probably the worst part about the whole thing. Losing the green is a tough thing to watch in Seattle, and it continues apace. It breaks my heart.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

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The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
Katie Miles

1916 Pike Pl # 1340 Seattle, WA 98101-1056 katiemiles@gmail.com

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From: kchesick@everyactioncustom.com <kchesick@everyactioncustom.com>

Sent: Friday, August 7, 2020 11:06 PM

To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

Subject: Comments on Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon and out of my own love of trees, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

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The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Please don't wait to strengthen and enact this proposed director's rule. Every day of delay is more trees lost in "the Emerald City."

Sincerely,  
 Katherine Chesick  
 1039 NE 127th St Seattle, WA 98125-4005 kchesick@earthlink.net

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From: dickbirnbaum@everyactioncustom.com <dickbirnbaum@everyactioncustom.com>  
 Sent: Friday, August 7, 2020 11:46 PM  
 To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
 Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

Over my 75 years living in the Ravenna/Bryant-UW-University Village neighborhood, I've observed a steady, and recently accelerating, diminution of tree canopy and related habitat, and of the diversity of animal life that should populate a healthy urban ecosystem

The land-use decisions the City makes, and the nature of the development these allow, are irreversible. The damage is done. For how much longer will the predations of development be allowed to define the future of our City, and condemn future generations to a degraded urban environment?

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

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The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
 Dick Birnbaum  
 2211 NE 54th St Seattle, WA 98105-3247  
 dickbirnbaum@comcast.net

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From: breean@everyactioncustom.com <breean@everyactioncustom.com>  
 Sent: Saturday, August 8, 2020 7:10 AM  
 To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
 Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

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Sincerely,  
Breean Kay

7305 25th Ave NW Seattle, WA 98117-4417 breean@tingleff.com

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From: jshenikoff@everyactioncustom.com <jshenikoff@everyactioncustom.com>

Sent: Saturday, August 8, 2020 7:24 AM

To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

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Sincerely,  
Jorja Henikoff  
4711 51st Pl SW Seattle, WA 98116-4331  
jshenikoff@gmail.com

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From: susan@everyactioncustom.com <susan@everyactioncustom.com>  
Sent: Saturday, August 8, 2020 7:44 AM  
To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
Subject: Let's strengthen tree protection!

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

I'm writing about the proposed Director's Rule 13-2020 relating to tree protection. Protecting Seattle's urban forest is important to me. Trees provide essential services to people and support more than 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

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Sincerely,  
 Susan London  
 711 Belmont Pl E Seattle, WA 98102-4420 susan@susanmlondon.com

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From: gyrogal@everyactioncustom.com <gyrogal@everyactioncustom.com>  
 Sent: Saturday, August 8, 2020 8:58 AM  
 To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
 Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCI is no longer concerned about the fate of the smaller, non-exceptional trees.

- Protect red alders, black cottonwoods, and bitter cherries. These native trees provide important resources to birds and other wildlife and contribute to our sense of place in Seattle. Following the "right tree, right place" philosophy, these native trees can safely thrive and should be protected like other species.
- Expand the definition of tree groves to stands of six or more trees at least six inches in diameter, including street trees. Tree groves provide important habitat for birds and are becoming less common outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove.
- Require public notice postings on development site and online for removal of Exceptional trees, even when hazardous, to ensure community members know when and where legal tree removal is occurring.
- Require replacement for trees removed from groves and removed hazard trees.
- Align SDCI's proposed Tree Care Provider Acknowledgement with SDOT's Tree Service Provider Registration. Do not automatically renew this form annually. It should be updated each year. Reduce the number of infractions tree service providers can incur in a year before they are removed from the City's list to do business from more than three infractions to more than two infractions.
- Section 4: Preference for planting off-site replacement trees on public property is restrictive. The Director should be able to allow replacement trees not only on public property, but also on private property, where desired by the property owner, in order to meet the City's goals and objectives of race and social justice under Seattle's Equity and Environment Initiative.

The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
 Barbara Dick  
 5109 Palatine Ave N Seattle, WA 98103-6023 gyrogal@earthlink.net

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From: avcrofts@everyactioncustom.com <avcrofts@everyactioncustom.com>  
 Sent: Saturday, August 8, 2020 8:59 AM  
 To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
 Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

I am a bird and tree lover!

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCI is no longer concerned about the fate of the smaller, non-exceptional trees.
- Protect red alders, black cottonwoods, and bitter cherries. These native trees provide important resources to birds and other wildlife and contribute to our sense of place in Seattle. Following the "right tree, right place" philosophy, these native trees can safely thrive and should be protected like other species.
- Expand the definition of tree groves to stands of six or more trees at least six inches in diameter, including street trees. Tree groves provide important habitat for birds and are becoming less common outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove.
- Require public notice postings on development site and online for removal of Exceptional trees, even when hazardous, to ensure community members know when and where legal tree removal is occurring.
- Require replacement for trees removed from groves and removed hazard trees.
- Align SDCI's proposed Tree Care Provider Acknowledgement with SDOT's Tree Service Provider Registration. Do not automatically renew this form annually. It should be updated each year. Reduce the number of infractions tree service providers can incur in a year before they are removed from the City's list to do business from more than three infractions to more than two infractions.
- Section 4: Preference for planting off-site replacement trees on public property is restrictive. The Director should be able to allow replacement trees not only on public property, but also on private property, where desired by the property owner, in order to meet the City's goals and objectives of race and social justice under Seattle's Equity and Environment Initiative.

The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
Anita Crofts  
5803 24th Ave NW Unit 43 Seattle, WA 98107-5266 [avcrofts@gmail.com](mailto:avcrofts@gmail.com)

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From: paulm@everyactioncustom.com <[paulm@everyactioncustom.com](mailto:paulm@everyactioncustom.com)>  
Sent: Saturday, August 8, 2020 9:12 AM  
To: Pinto de Bader, Sandra <[Sandra.Pinto\\_de\\_Bader@Seattle.gov](mailto:Sandra.Pinto_de_Bader@Seattle.gov)>  
Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

Dear Mayor Durkan, Council President González, and Councilmember Juarez:

I am writing to urge you to protect and expand Seattle's urban forest. Trees are an essential part of the carbon cycle that sustains life on Earth. Seattle's trees provide habitat and foraging areas for more than 100 species of birds, which are of particular concern to me as a longtime member of Seattle Audubon. A healthy, growing, and equitably distributed urban forest are needed for people and wildlife to thrive in our city.

I am writing specifically to address proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

However, the proposed rule could be strengthened in the following ways:

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCI is no longer concerned about the fate of the smaller, non-exceptional trees.
- Protect red alders, black cottonwoods, and bitter cherries. These native trees provide important resources to birds and other wildlife and contribute to our sense of place in Seattle. Following the "right tree, right place" philosophy, these native trees can safely thrive and should be protected like other species.
- Expand the definition of tree groves to stands of six or more trees at least six inches in diameter, including street trees. Tree groves provide important habitat for birds and are becoming less common outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove.
- Require public notice postings on development site and online for removal of Exceptional trees, even when hazardous, to ensure community members know when and where legal tree removal is occurring.
- Require replacement for trees removed from groves and removed hazard trees.
- Align SDCI's proposed Tree Care Provider Acknowledgement with SDOT's Tree Service Provider Registration. Do not automatically renew this form annually. It should be updated each year. Reduce the number of infractions tree service providers can incur in a year before they are removed from the City's list to do business from more than three infractions to more than two infractions.
- Section 4: Preference for planting off-site replacement trees on public property is restrictive. The Director should be able to allow replacement trees not only on public property, but also on private property, where desired by the property owner, in order to meet the City's goals and objectives of race and social justice under Seattle's Equity and Environment Initiative.

The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Thank you for your consideration.

Sincerely,  
Paul Metzner  
12201 9th Ave NE Seattle, WA 98125-4957 paulm@seanet.com

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From: janplawrence@everyactioncustom.com <janplawrence@everyactioncustom.com>

Sent: Saturday, August 8, 2020 9:32 AM

To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCI is no longer concerned about the fate of the smaller, non-exceptional trees.
- Protect red alders, black cottonwoods, and bitter cherries. These native trees provide important resources to birds and other wildlife and contribute to our sense of place in Seattle. Following the "right tree, right place" philosophy, these native trees can safely thrive and should be protected like other species.
- Expand the definition of tree groves to stands of six or more trees at least six inches in diameter, including street trees. Tree groves provide important habitat for birds and are becoming less common outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove.
- Require public notice postings on development site and online for removal of Exceptional trees, even when hazardous, to ensure community members know when and where legal tree removal is occurring.

- Require replacement for trees removed from groves and removed hazard trees.
- Align SDCI's proposed Tree Care Provider Acknowledgement with SDOT's Tree Service Provider Registration. Do not automatically renew this form annually. It should be updated each year. Reduce the number of infractions tree service providers can incur in a year before they are removed from the City's list to do business from more than three infractions to more than two infractions.
- Section 4: Preference for planting off-site replacement trees on public property is restrictive. The Director should be able to allow replacement trees not only on public property, but also on private property, where desired by the property owner, in order to meet the City's goals and objectives of race and social justice under Seattle's Equity and Environment Initiative.

The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
 Jan Lawrence  
 6211 2nd Ave NW Seattle, WA 98107-2022  
 janplawrence@msn.com

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From: msawedball@everyactioncustom.com <msawedball@everyactioncustom.com>  
 Sent: Saturday, August 8, 2020 9:38 AM  
 To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
 Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCI is no longer concerned about the fate of the smaller, non-exceptional trees.
- Protect red alders, black cottonwoods, and bitter cherries. These native trees provide important resources to birds and other wildlife and contribute to our sense of place in Seattle. Following the "right tree, right place" philosophy, these native trees can safely thrive and should be protected like other species.

- Expand the definition of tree groves to stands of six or more trees at least six inches in diameter, including street trees. Tree groves provide important habitat for birds and are becoming less common outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove.
- Require public notice postings on development site and online for removal of Exceptional trees, even when hazardous, to ensure community members know when and where legal tree removal is occurring.
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- Align SDCI's proposed Tree Care Provider Acknowledgement with SDOT's Tree Service Provider Registration. Do not automatically renew this form annually. It should be updated each year. Reduce the number of infractions tree service providers can incur in a year before they are removed from the City's list to do business from more than three infractions to more than two infractions.
- Section 4: Preference for planting off-site replacement trees on public property is restrictive. The Director should be able to allow replacement trees not only on public property, but also on private property, where desired by the property owner, in order to meet the City's goals and objectives of race and social justice under Seattle's Equity and Environment Initiative.

The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
 Vicki Panzeri  
 2115 N 90th St Seattle, WA 98103-4123  
 msawedball@yahoo.com

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From: finylester@everyactioncustom.com <finylester@everyactioncustom.com>  
 Sent: Saturday, August 8, 2020 10:22 AM  
 To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
 Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

I'm fine with the rule as is.

I love nature but I also realize that trees are just a part of it, and they can be expensive and problematic in cities. Seattle has more than enough trees.

Sincerely,  
 Russ Finley  
 1506 N 36th St Seattle, WA 98103-8932  
 finylester@hotmail.com

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From: tonypam@everyactioncustom.com <tonypam@everyactioncustom.com>  
Sent: Saturday, August 8, 2020 11:15 AM  
To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

Living near Carkeek Park and a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city. Yet many of my neighbors have and are cutting down their trees.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCI is no longer concerned about the fate of the smaller, non-exceptional trees.
- Protect red alders, black cottonwoods, and bitter cherries. These native trees provide important resources to birds and other wildlife and contribute to our sense of place in Seattle. Following the "right tree, right place" philosophy, these native trees can safely thrive and should be protected like other species.
- Expand the definition of tree groves to stands of six or more trees at least six inches in diameter, including street trees. Tree groves provide important habitat for birds and are becoming less common outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove.
- Require public notice postings on development site and online for removal of Exceptional trees, even when hazardous, to ensure community members know when and where legal tree removal is occurring.
- Require replacement for trees removed from groves and removed hazard trees.
- Align SDCI's proposed Tree Care Provider Acknowledgement with SDOT's Tree Service Provider Registration. Do not automatically renew this form annually. It should be updated each year. Reduce the number of infractions tree service providers can incur in a year before they are removed from the City's list to do business from more than three infractions to more than two infractions.
- Section 4: Preference for planting off-site replacement trees on public property is restrictive. The Director should be able to allow replacement trees not only on public property, but also on private

property, where desired by the property owner, in order to meet the City's goals and objectives of race and social justice under Seattle's Equity and Environment Initiative.

The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
Pamela Puglisi  
1327 NW Norcross Way Seattle, WA 98177-5235 tonypam@comcast.net

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From: franielferman@everyactioncustom.com <franielferman@everyactioncustom.com>

Sent: Saturday, August 8, 2020 12:16 PM

To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon and a resident of Seattle's District 6, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city. We live in the "Emerald City" and need to embrace that as we think of the canopy and biodiversity our city can offer.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCI is no longer concerned about the fate of the smaller, non-exceptional trees.
- Protect native trees like red alders, black cottonwoods, and bitter cherries. These native trees provide important resources to birds and other wildlife and contribute to our sense of place in Seattle. Following the "right tree, right place" philosophy, these native trees can safely thrive and should be protected like other species.
- Expand the definition of tree groves to stands of six or more trees at least six inches in diameter, including street trees. Tree groves provide important habitat for birds and are becoming less common outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove.

- Require public notice postings on development site and online for removal of Exceptional trees, even when hazardous, to ensure community members know when and where legal tree removal is occurring.
- Require replacement for trees removed from groves and removed hazard trees.
- Align SDCI's proposed Tree Care Provider Acknowledgement with SDOT's Tree Service Provider Registration. Do not automatically renew this form annually. It should be updated each year. Reduce the number of infractions tree service providers can incur in a year before they are removed from the City's list to do business from more than three infractions to more than two infractions.
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The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,

Frances Merenda

6503 Dayton Ave N Seattle, WA 98103-5241 [franielmerman@gmail.com](mailto:franielmerman@gmail.com)

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From: [larinsmith2010@everyactioncustom.com](mailto:larinsmith2010@everyactioncustom.com) <[larinsmith2010@everyactioncustom.com](mailto:larinsmith2010@everyactioncustom.com)>

Sent: Saturday, August 8, 2020 12:30 PM

To: Pinto de Bader, Sandra <[Sandra.Pinto\\_de\\_Bader@Seattle.gov](mailto:Sandra.Pinto_de_Bader@Seattle.gov)>

Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCI is no longer concerned about the fate of the smaller, non-exceptional trees.

- Protect red alders, black cottonwoods, and bitter cherries. These native trees provide important resources to birds and other wildlife and contribute to our sense of place in Seattle. Following the "right tree, right place" philosophy, these native trees can safely thrive and should be protected like other species.
- Expand the definition of tree groves to stands of six or more trees at least six inches in diameter, including street trees. Tree groves provide important habitat for birds and are becoming less common outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove.
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The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,

Larin Summer

4251 Aurora Ave N Apt 214 Seattle, WA 98103-7331 [larinsmith2010@hotmail.com](mailto:larinsmith2010@hotmail.com)

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**From:** Penrose-Muerdter <[mue.rose@gmail.com](mailto:mue.rose@gmail.com)>

**Sent:** Saturday, August 8, 2020 1:45 PM

**To:** SCIDRulesComments@seattle.gov

**Cc:** Pinto de Bader, Sandra <[Sandra.Pinto\\_de\\_Bader@Seattle.gov](mailto:Sandra.Pinto_de_Bader@Seattle.gov)>

**Subject:** Citizen Input: Proposed Director's Rule 13-2020 Relating to Tree Protection

**CAUTION: External Email**

To the Seattle Department of Construction and Inspections:

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements

for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

MY ASK: please do not delay strengthening and implementing the Director's Rule Relating to Tree Protection. Action is crucial to protect our trees, which contribute so much to our quality of life here in Seattle. Time to live up to our Emerald City nickname!

The proposed rule can be strengthened in the following ways:

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCI is no longer concerned about the fate of the smaller, non-exceptional trees.
- Protect red alders, black cottonwoods, and bitter cherries. These native trees provide important resources to birds and other wildlife and contribute to our sense of place in Seattle. Following the "right tree, right place" philosophy, these native trees can safely thrive and should be protected like other species.
- Expand the definition of tree groves to stands of six or more trees at least six inches in diameter, including street trees. Tree groves provide important habitat for birds and are becoming less common outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove.
- Require public notice postings on development site and online for removal of Exceptional trees, even when hazardous, to ensure community members know when and where legal tree removal is occurring.
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- Align SDCI's proposed Tree Care Provider Acknowledgement with SDOT's Tree Service Provider Registration. Do not automatically renew this form annually. It should be updated each year. Reduce the number of infractions tree service providers can incur in a year before they are removed from the City's list to do business from more than three infractions to more than two infractions.
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The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban

Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,

Nancy Penrose

2402 E Olive St Seattle, WA 98122-3034

[mue.rose@gmail.com](mailto:mue.rose@gmail.com)

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From: bdarra1@everyactioncustom.com <bdarra1@everyactioncustom.com>

Sent: Saturday, August 8, 2020 1:47 PM

To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

Having lived in the same house in the Madrona neighborhood for 58 years I have been gratified at the growth of the urban forest around us.. My husband and I planted a number of conifers in our yard shortly after we moved in in 1962. You can imagine how they now look after 58 years of growth. All protections you can provide to our beloved front and backyard trees are essential, not only to us but to our entire neighborhood and to the wider environment.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property. Please continue your good efforts.

Sincerely,

Betsy Darrah

826 37th Ave Seattle, WA 98122-5225

[bdarra1@comcast.net](mailto:bdarra1@comcast.net)

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From: schinzinger@everyactioncustom.com <schinzinger@everyactioncustom.com>

Sent: Saturday, August 8, 2020 4:52 PM

To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCI is no longer concerned about the fate of the smaller, non-exceptional trees.
- Protect red alders, black cottonwoods, and bitter cherries. These native trees provide important resources to birds and other wildlife and contribute to our sense of place in Seattle. Following the "right tree, right place" philosophy, these native trees can safely thrive and should be protected like other species.
- Expand the definition of tree groves to stands of six or more trees at least six inches in diameter, including street trees. Tree groves provide important habitat for birds and are becoming less common outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove.
- Require public notice postings on development site and online for removal of Exceptional trees, even when hazardous, to ensure community members know when and where legal tree removal is occurring.
- Require replacement for trees removed from groves and removed hazard trees.
- Align SDCI's proposed Tree Care Provider Acknowledgement with SDOT's Tree Service Provider Registration. Do not automatically renew this form annually. It should be updated each year. Reduce the number of infractions tree service providers can incur in a year before they are removed from the City's list to do business from more than three infractions to more than two infractions.
- Section 4: Preference for planting off-site replacement trees on public property is restrictive. The Director should be able to allow replacement trees not only on public property, but also on private property, where desired by the property owner, in order to meet the City's goals and objectives of race and social justice under Seattle's Equity and Environment Initiative.

The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
Barbara Schinzinger  
4835 Lake Washington Blvd S Seattle, WA 98118-1550 schinzinger@gmail.com

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From: vkimcm@everyactioncustom.com <vkimcm@everyactioncustom.com>  
Sent: Saturday, August 8, 2020 5:08 PM  
To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city. Urban living is made more enticing with green spaces. Preserving our "Emerald City" by protecting our trees is important for the quality of life for human and wild animal residents of the city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCI is no longer concerned about the fate of the smaller, non-exceptional trees.
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The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
Vicki McMullin  
112 N 49th St Seattle, WA 98103-6323  
vkimcm@gmail.com

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From: swanbird2@everyactioncustom.com <swanbird2@everyactioncustom.com>  
Sent: Saturday, August 8, 2020 6:05 PM  
To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Trees are essential in decreasing CO2 from our air/atmosphere. In this age of climate change trees are more important than ever in helping us avert the impending climate crisis. We need to make changes quickly to prevent irreversible harm to our planet. Saving trees and planting native trees is one way to help.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCl is no longer concerned about the fate of the smaller, non-exceptional trees.
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- Expand the definition of tree groves to stands of six or more trees at least six inches in diameter, including street trees. Tree groves provide important habitat for birds and are becoming less common outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove.

- Require public notice postings on development site and online for removal of Exceptional trees, even when hazardous, to ensure community members know when and where legal tree removal is occurring.
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- Align SDCI's proposed Tree Care Provider Acknowledgement with SDOT's Tree Service Provider Registration. Do not automatically renew this form annually. It should be updated each year. Reduce the number of infractions tree service providers can incur in a year before they are removed from the City's list to do business from more than three infractions to more than two infractions.
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The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
 Amy Swanson  
 27412 124th Pl SE Kent, WA 98030-8510  
 swanbird2@gmail.com

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From: ewbankw@everyactioncustom.com <ewbankw@everyactioncustom.com>  
 Sent: Sunday, August 9, 2020 9:34 AM  
 To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
 Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCI is no longer concerned about the fate of the smaller, non-exceptional trees.

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The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
 Wendy Ewbank  
 1631 16th Ave Seattle, WA 98122-4044  
 ewbankw@gmail.com

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From: gojulia@everyactioncustom.com <gojulia@everyactioncustom.com>  
 Sent: Sunday, August 9, 2020 11:02 AM  
 To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
 Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

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The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
Julia Gold  
406 24th Ave E Seattle, WA 98112-4714  
gojulia@comcast.net

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From: eileen.maloney@everyactioncustom.com <eileen.maloney@everyactioncustom.com>  
Sent: Sunday, August 9, 2020 11:39 AM

To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

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The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
eileen maloney  
423 24th Ave E Seattle, WA 98112-4713  
eileen.maloney@gmail.com

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From: pjb70435@everyactioncustom.com <pjb70435@everyactioncustom.com>  
Sent: Sunday, August 9, 2020 12:44 PM  
To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

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- Require public notice postings on development site and online for removal of Exceptional trees, even when hazardous, to ensure community members know when and where legal tree removal is occurring.
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- Align SDCI's proposed Tree Care Provider Acknowledgement with SDOT's Tree Service Provider Registration. Do not automatically renew this form annually. It should be updated each year. Reduce the number of infractions tree service providers can incur in a year before they are removed from the City's list to do business from more than three infractions to more than two infractions.
- Section 4: Preference for planting off-site replacement trees on public property is restrictive. The Director should be able to allow replacement trees not only on public property, but also on private property, where desired by the property owner, in order to meet the City's goals and objectives of race and social justice under Seattle's Equity and Environment Initiative.

The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
 Pamela Barber  
 10700 SE 260th St Unit L103 Kent, WA 98030-7039 pjb70435@gmail.com

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From: mmueller@everyactioncustom.com <mmueller@everyactioncustom.com>  
 Sent: Sunday, August 9, 2020 1:22 PM  
 To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
 Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, a long-time Seattle resident, a biologist and biology instructor, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city. Yet we continue to lose the trees we already have, due to development without sufficient protection and mitigation for our trees. I see this constantly in my Ballard neighborhood.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCI is no longer concerned about the fate of the smaller, non-exceptional trees.
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- Expand the definition of tree groves to stands of six or more trees at least six inches in diameter, including street trees. Tree groves provide important habitat for birds and are becoming less common outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove.
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- Align SDCI's proposed Tree Care Provider Acknowledgement with SDOT's Tree Service Provider Registration. Do not automatically renew this form annually. It should be updated each year. Reduce the number of infractions tree service providers can incur in a year before they are removed from the City's list to do business from more than three infractions to more than two infractions.
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The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
 Melinda Mueller  
 7704 16th Ave NW Seattle, WA 98117-5419 [mmueller@seattleacademy.org](mailto:mmueller@seattleacademy.org)

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**From:** Audrey Meade <[info@email.actionnetwork.org](mailto:info@email.actionnetwork.org)>  
**Sent:** Sunday, August 9, 2020 3:21 PM  
**To:** Pinto de Bader, Sandra <[Sandra.Pinto\\_de\\_Bader@Seattle.gov](mailto:Sandra.Pinto_de_Bader@Seattle.gov)>  
**Subject:** Please Strengthen Seattle's Tree Ordinance

**CAUTION: External Email**

Sandra Pinto de Bader,

Seattle's trees and urban forest are vital to keeping our city healthy and livable. Trees and the urban forest comprise a vital green infrastructure. Trees reduce air pollution, storm water runoff and climate impacts like heat island effects, while providing essential habitat for birds and other wildlife. They are important for the physical and mental health of our residents.

Seattle's rapid growth and an outdated tree ordinance are reducing these beneficial effects as trees are removed and not replaced. It is urgent to act now to stop this continued loss of trees, particularly large mature trees and tree groves. It is important to promote environmental equity as trees are replaced.

Please update Seattle's Tree Protection Ordinance as recommended in the latest draft by the Seattle Urban Forestry Commission.

Here are the key provisions that need to be in the updated tree ordinance:

1. Expand the existing Tree Removal and Replacement Permit Program, including 2-week public notice and posting on-site, as used by the Seattle Department of Transportation (SDOT) – to cover all Significant Trees (6" and larger diameter at breast height (DBH)) on private property in all land use zones, both during development and outside development.
2. Require the replacement of all Significant Trees removed with trees that in 25 years will reach equivalent canopy volume – either on site or pay a replacement fee into a City Tree Replacement and Preservation Fund. Allow the Fund to also accept fines, donations, grants and set up easements.
3. Retain current protections for Exceptional Trees and reduce the upper threshold for Exceptional Trees to 24" DBH, protect tree groves and prohibit Significant Trees being removed on undeveloped lots.
4. Allow removal of no more than 2 Significant non-Exceptional Trees in 3 years per lot outside development
5. Establish one citywide database for applying for Tree Removal and Replacement Permits and to track changes in the tree canopy.
6. Post online all permit requests and permit approvals for public viewing.
7. Expand SDOT's existing tree service provider's registration and certification to register all Tree Service Providers (arborists) working on trees in Seattle.
8. Provide adequate funding in the budget to implement and enforce the updated ordinance.

Audrey Meade

[audreebee@gmail.com](mailto:audreebee@gmail.com)

4126 42nd Ave S

Seattle, Washington 98118

From: terrircole@everyactioncustom.com <terrircole@everyactioncustom.com>  
Sent: Sunday, August 9, 2020 3:35 PM  
To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
Subject: Protect Seattle's urban forest!

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

I support the efforts of the Seattle Audubon and believe in the need for protecting Seattle's urban forest. Trees are essential for the environment, create healthier neighborhoods, lower temperatures, and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. This rule does offer improvements for tree protection, but I believe it can go farther:

- Ensure clarity around the code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees.
- Protect native trees - red alders, black cottonwoods, and bitter cherries. Following the "right tree, right place" philosophy, these native trees can safely thrive and should be protected like other species.
- Definition a grove of trees to stands of six or more trees at least six inches in diameter, including street trees.
- Require public notice postings on development site and online for removal of Exceptional trees.
- Require replacement for trees removed from groves and removed hazard trees.
- Align SDCI's proposed Tree Care Provider Acknowledgement with SDOT's Tree Service Provider Registration.
- Section 4: Change to allow replacement trees not only on public property, but also on private property, where desired by the property owner.

The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
Terri Cole  
8319 Jones Ave NW Seattle, WA 98117-3503 terrircole@outlook.com

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From: shannonlbb@everyactioncustom.com <shannonlbb@everyactioncustom.com>  
Sent: Sunday, August 9, 2020 4:02 PM  
To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

I am a Seattleite who appreciates the urban forest and all the flora and fauna it supports. I am also a supporter of Seattle Audubon. Protecting Seattle's urban forest is important to me. Trees are beneficial to all people, not just the rich and privileged. They are important for a healthy community because they support over 100 local bird species. They also provide essential services to people in the form of jobs. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

If we take care of our environment then we are truly taking care of the least among us who cannot speak for themselves but do so much for us. And taking care of trees not only adds to the health of our environment but to the long term health of the planet. If we forsake this vision of living in harmony with nature then we stand at risk of forsaking our future - and those of future generations.

I want to thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

But we can do more, and do it better.

Please add the following strengths to the rule"

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCI is no longer concerned about the fate of the smaller, non-exceptional trees.
- Protect red alders, black cottonwoods, and bitter cherries. These native trees provide important resources to birds and other wildlife and contribute to our sense of place in Seattle. Following the "right tree, right place" philosophy, these native trees can safely thrive and should be protected like other species.
- Expand the definition of tree groves to stands of six or more trees at least six inches in diameter, including street trees. Tree groves provide important habitat for birds and are becoming less common outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove.
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- Require replacement for trees removed from groves and removed hazard trees.
- Align SDCI's proposed Tree Care Provider Acknowledgement with SDOT's Tree Service Provider Registration. Do not automatically renew this form annually. It should be updated each year. Reduce the number of infractions tree service providers can incur in a year before they are removed from the City's list to do business from more than three infractions to more than two infractions.

- Section 4: Preference for planting off-site replacement trees on public property is restrictive. The Director should be able to allow replacement trees not only on public property, but also on private property, where desired by the property owner, in order to meet the City's goals and objectives of race and social justice under Seattle's Equity and Environment Initiative.

The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
Shannon beasley-bailey  
7051 19th Ave NE Seattle, WA 98115-5703 shannonlbb@yahoo.com

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From: emily.pco1944@everyactioncustom.com <emily.pco1944@everyactioncustom.com>  
Sent: Sunday, August 9, 2020 4:06 PM  
To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCI is no longer concerned about the fate of the smaller, non-exceptional trees.
- Protect red alders, black cottonwoods, and bitter cherries. These native trees provide important resources to birds and other wildlife and contribute to our sense of place in Seattle. Following the "right tree, right place" philosophy, these native trees can safely thrive and should be protected like other species.
- Expand the definition of tree groves to stands of six or more trees at least six inches in diameter, including street trees. Tree groves provide important habitat for birds and are becoming less common outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove.
- Require public notice postings on development site and online for removal of Exceptional trees to ensure community members know when and where legal tree removal is occurring.

- Require replacement for trees removed from groves and removed hazard trees.
- Align SDCI's proposed Tree Care Provider Acknowledgement with SDOT's Tree Service Provider Registration. Do not automatically renew this form annually. It should be updated each year. Reduce the number of infractions tree service providers can incur in a year before they are removed from the City's list to do business from more than three infractions to more than two infractions.
- Section 4: Preference for planting off-site replacement trees on public property is restrictive. The Director should be able to allow replacement trees not only on public property, but also on private property, where desired by the property owner, in order to meet the City's goals and objectives of race and social justice under Seattle's Equity and Environment Initiative.

In addition to providing important habitat for birds, protecting our tree canopy is also important to human health. Trees help reduce harmful air pollutants, and cool our city. As temperatures continue to rise, this will only be increasingly important to preserve, particularly for low-income families where cooling costs can be prohibitive. (Studies have shown that temperatures within the same city up to 20 degrees different due to lack of tree cover: <https://protect2.fireeye.com/v1/url?k=bff6d8f3-e146aea9-bff6f043-8681d5b5fa8e-c3c9ca6605bc3625&q=1&e=18ff7b4f-8ed3-4b07-af40-e21a58843a12&u=https%3A%2F%2Fwww.kuow.org%2Fstories%2Fflocking-for-hotspots-of-climate-change-and-inequity>)

The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Thank you.

Sincerely,  
 Emily Knudsen  
 2826 S Columbian Way Seattle, WA 98108-2147 emily.pco1944@gmail.com

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From: prinzromero@everyactioncustom.com <prinzromero@everyactioncustom.com>  
 Sent: Sunday, August 9, 2020 5:00 PM  
 To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
 Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCI is no longer concerned about the fate of the smaller, non-exceptional trees.
- Protect red alders, black cottonwoods, and bitter cherries. These native trees provide important resources to birds and other wildlife and contribute to our sense of place in Seattle. Following the "right tree, right place" philosophy, these native trees can safely thrive and should be protected like other species.
- Expand the definition of tree groves to stands of six or more trees at least six inches in diameter, including street trees. Tree groves provide important habitat for birds and are becoming less common outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove.
- Require public notice postings on development site and online for removal of Exceptional trees, even when hazardous, to ensure community members know when and where legal tree removal is occurring.
- Require replacement for trees removed from groves and removed hazard trees.
- Align SDCI's proposed Tree Care Provider Acknowledgement with SDOT's Tree Service Provider Registration. Do not automatically renew this form annually. It should be updated each year. Reduce the number of infractions tree service providers can incur in a year before they are removed from the City's list to do business from more than three infractions to more than two infractions.
- Section 4: Preference for planting off-site replacement trees on public property is restrictive. The Director should be able to allow replacement trees not only on public property, but also on private property, where desired by the property owner, in order to meet the City's goals and objectives of race and social justice under Seattle's Equity and Environment Initiative.

The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,

Alice Romero

1639 Harbor Ave SW Seattle, WA 98126-2070 prinzromero@comcast.net

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From: olsenjulie@everyactioncustom.com <olsenjulie@everyactioncustom.com>

Sent: Sunday, August 9, 2020 6:48 PM

To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services--shade, protection from heat, privacy--to people: trees beautify our city! Even more importantly, trees support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city. During my three decades in Seattle, I have witnessed the thinning of our urban forest because of over-development. Even our exceptional trees are threatened with removal.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and tracking trees on private property.

The proposed rule can be strengthened in the following ways:

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCI is no longer concerned about the fate of the smaller, non-exceptional trees.
- Protect red alders, black cottonwoods, and bitter cherries. These native trees provide important resources to birds and other wildlife and contribute to our sense of place in Seattle. Following the "right tree, right place" philosophy, these native trees can safely thrive and should be protected like other species.
- Expand the definition of tree groves to stands of six or more trees at least six inches in diameter, including street trees. Tree groves provide important habitat for birds and are becoming less common outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove.
- Require public notice postings on development site and online for removal of Exceptional trees, even when hazardous, to ensure community members know when and where legal tree removal is occurring.
- Require replacement for trees removed from groves and removed hazard trees.
- Align SDCI's proposed Tree Care Provider Acknowledgement with SDOT's Tree Service Provider Registration. Do not automatically renew this form annually. It should be updated each year. Reduce the number of infractions tree service providers can incur in a year before they are removed from the City's list to do business from more than three infractions to more than two infractions.
- Section 4: Preference for planting off-site replacement trees on public property is restrictive. The Director should be able to allow replacement trees not only on public property, but also on private property, where desired by the property owner, in order to meet the City's goals and objectives of race and social justice under Seattle's Equity and Environment Initiative.

The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
Julie Olsen  
750 Belmont Ave E Seattle, WA 98102-5919 olsenjulie@mac.com

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From: cgjanzen@everyactioncustom.com <cgjanzen@everyactioncustom.com>  
Sent: Sunday, August 9, 2020 8:29 PM  
To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
Subject: RE: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

Developers are currently allowed to clearcut our old growth trees with zero consequences. How can city official claim they want to do something to curb climate change, when they then turn around and put the developers' profits ahead of saving our tree canopy?? Old growth trees are one of the best defenses against climate chaos, but they don't have lobbyists or big bucks. Cutting down large trees and sometimes replacing them with small trees is doing very little to combat climate chaos since it takes 50 years for trees to be able to start performing their natural ability to mitigate climate change.

Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city. We can have development AND trees if more thought is put into the planning process.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

However, the proposed rule needs to be strengthened in the following ways:

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCI is no longer concerned about the fate of the smaller, non-exceptional trees.
- Protect red alders, black cottonwoods, and bitter cherries. These native trees provide important resources to birds and other wildlife and contribute to our sense of place in Seattle. Following the "right tree, right place" philosophy, these native trees can safely thrive and should be protected like other species.
- Expand the definition of tree groves to stands of six or more trees at least six inches in diameter, including street trees. Tree groves provide important habitat for birds and are becoming less common outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove.
- Require public notice postings on development site and online for removal of Exceptional trees, even when hazardous, to ensure community members know when and where legal tree removal is occurring.

- Require replacement and care for trees removed from groves and removed hazard trees.
- Align SDCI's proposed Tree Care Provider Acknowledgement with SDOT's Tree Service Provider Registration. Do not automatically renew this form annually. It should be updated each year. Reduce the number of infractions tree service providers can incur in a year before they are removed from the City's list to do business from more than three infractions to more than two infractions.
- Section 4: Preference for planting off-site replacement trees on public property is restrictive. The Director should be able to allow replacement trees not only on public property, but also on private property, where desired by the property owner, in order to meet the City's goals and objectives of race and social justice under Seattle's Equity and Environment Initiative.

The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Trees benefit us all, so retaining them needs to be given a higher priority by Seattle city leaders.

Sincerely,  
 Gayle Janzen  
 11232 Dayton Ave N Seattle, WA 98133-8611 cgjanzen@comcast.net

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From: catlady1@everyactioncustom.com <catlady1@everyactioncustom.com>  
 Sent: Sunday, August 9, 2020 9:14 PM  
 To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
 Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCI is no longer concerned about the fate of the smaller, non-exceptional trees.
- Protect red alders, black cottonwoods, and bitter cherries. These native trees provide important resources to birds and other wildlife and contribute to our sense of place in Seattle. Following the "right

tree, right place" philosophy, these native trees can safely thrive and should be protected like other species.

- Expand the definition of tree groves to stands of six or more trees at least six inches in diameter, including street trees. Tree groves provide important habitat for birds and are becoming less common outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove.
- Require public notice postings on development site and online for removal of Exceptional trees, even when hazardous, to ensure community members know when and where legal tree removal is occurring.
- Require replacement for trees removed from groves and removed hazard trees.
- Align SDCI's proposed Tree Care Provider Acknowledgement with SDOT's Tree Service Provider Registration. Do not automatically renew this form annually. It should be updated each year. Reduce the number of infractions tree service providers can incur in a year before they are removed from the City's list to do business from more than three infractions to more than two infractions.
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The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
Mary Pat DiLeva  
712 15th Ave Seattle, WA 98122-4516  
catlady1@wavecable.com

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From: carolfurry@everyactioncustom.com <carolfurry@everyactioncustom.com>  
Sent: Sunday, August 9, 2020 10:13 PM  
To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

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- Require public notice postings on development site and online for removal of Exceptional trees, even when hazardous, to ensure community members know when and where legal tree removal is occurring.
- Require replacement for trees removed from groves and removed hazard trees.
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The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
carol furry

8003 Sand Point Way NE Unit B24 Seattle, WA 98115-6357 carolfurry@gmail.com

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From: elizabethberggren@everyactioncustom.com <elizabethberggren@everyactioncustom.com>

Sent: Sunday, August 9, 2020 10:41 PM

To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

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- Require public notice postings on development site and online for removal of Exceptional trees, even when hazardous, to ensure community members know when and where legal tree removal is occurring.
- Require replacement for trees removed from groves and removed hazard trees.
- Align SDCI's proposed Tree Care Provider Acknowledgement with SDOT's Tree Service Provider Registration. Do not automatically renew this form annually. It should be updated each year. Reduce the number of infractions tree service providers can incur in a year before they are removed from the City's list to do business from more than three infractions to more than two infractions.
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The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
Elizabeth Berggren

112 25th Ave E Apt 302 Seattle, WA 98112-5471 elizabethberggren@comcast.net

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From: carapko56@everyactioncustom.com <carapko56@everyactioncustom.com>

Sent: Monday, August 10, 2020 7:24 AM

To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

We have lived in this neighborhood for 30 years and have seen so many trees get churned up within days in order to build another giant house. There is so much more noise pollution now. Trees are taken down anytime of year. During nesting time and at such a fast rate all over the Seattle plus areas in order to bring in more congestion, and take away habitat for the birds and animals who also need to live here. Beauty and nature, quality of life are being replaced with no possible equal, a great loss to the future as well, which delivers only emptiness when more and more animals who support the natural balance are tossed aside. As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCI is no longer concerned about the fate of the smaller, non-exceptional trees.
- Protect red alders, black cottonwoods, and bitter cherries. These native trees provide important resources to birds and other wildlife and contribute to our sense of place in Seattle. Following the "right tree, right place" philosophy, these native trees can safely thrive and should be protected like other species.
- Expand the definition of tree groves to stands of six or more trees at least six inches in diameter, including street trees. Tree groves provide important habitat for birds and are becoming less common outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove.
- Require public notice postings on development site and online for removal of Exceptional trees, even when hazardous, to ensure community members know when and where legal tree removal is occurring.
- Require replacement for trees removed from groves and removed hazard trees.
- Align SDCI's proposed Tree Care Provider Acknowledgement with SDOT's Tree Service Provider Registration. Do not automatically renew this form annually. It should be updated each year. Reduce the

number of infractions tree service providers can incur in a year before they are removed from the City's list to do business from more than three infractions to more than two infractions.

- Section 4: Preference for planting off-site replacement trees on public property is restrictive. The Director should be able to allow replacement trees not only on public property, but also on private property, where desired by the property owner, in order to meet the City's goals and objectives of race and social justice under Seattle's Equity and Environment Initiative.

The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,

Cheryl Rapko

22314 Meridian Ave S Bothell, WA 98021-8378 carapko56@gmail.com

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From: corneil.jeffrey@everyactioncustom.com <corneil.jeffrey@everyactioncustom.com>

Sent: Monday, August 10, 2020 7:48 AM

To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCI is no longer concerned about the fate of the smaller, non-exceptional trees.
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- Expand the definition of tree groves to stands of six or more trees at least six inches in diameter, including street trees. Tree groves provide important habitat for birds and are becoming less common outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove.

- Require public notice postings on development site and online for removal of Exceptional trees, even when hazardous, to ensure community members know when and where legal tree removal is occurring.
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The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
 Jeffrey Corneil  
 5561 Kenwood Pl N Seattle, WA 98103-5921 corneil.jeffrey@gmail.com

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From: suzanne.richman@everyactioncustom.com <suzanne.richman@everyactioncustom.com>  
 Sent: Monday, August 10, 2020 10:07 AM  
 To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
 Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCI is no longer concerned about the fate of the smaller, non-exceptional trees.

- Protect red alders, black cottonwoods, and bitter cherries. These native trees provide important resources to birds and other wildlife and contribute to our sense of place in Seattle. Following the "right tree, right place" philosophy, these native trees can safely thrive and should be protected like other species.
- Expand the definition of tree groves to stands of six or more trees at least six inches in diameter, including street trees. Tree groves provide important habitat for birds and are becoming less common outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove.
- Require public notice postings on development site and online for removal of Exceptional trees, even when hazardous, to ensure community members know when and where legal tree removal is occurring.
- Require replacement for trees removed from groves and removed hazard trees.
- Align SDCI's proposed Tree Care Provider Acknowledgement with SDOT's Tree Service Provider Registration. Do not automatically renew this form annually. It should be updated each year. Reduce the number of infractions tree service providers can incur in a year before they are removed from the City's list to do business from more than three infractions to more than two infractions.
- Section 4: Preference for planting off-site replacement trees on public property is restrictive. The Director should be able to allow replacement trees not only on public property, but also on private property, where desired by the property owner, in order to meet the City's goals and objectives of race and social justice under Seattle's Equity and Environment Initiative.

The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
 SUZANNE RICHMAN  
 109 John St Seattle, WA 98109-4964  
 suzanne.richman@yahoo.com

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From: ctmarshall85@everyactioncustom.com <ctmarshall85@everyactioncustom.com>  
 Sent: Monday, August 10, 2020 10:59 AM  
 To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
 Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

Protecting Seattle's urban forest is important to me. After spending the first two decades of my life here, the city's abundance of large trees and other green space is one of the reasons for my recent relocation back. As Seattleites, we are so fortunate to have a healthy, robust urban forest that spans across neighborhoods, and throughout the city. However, growing up in several different neighborhoods showed me that natural resources vital to public health and recreation -- like green space, street trees and a dense tree canopy -- are not equitably resourced and managed for all communities. People and

wildlife need a healthy, growing, and equitably distributed urban forest to thrive in our city. Please ensure that policy direction included in the final version of Rule 13-2020, the Director's draft tree protection ordinance, strives to preserve and strengthen Seattle's urban forest in the most equitable way possible, in terms of race, social justice, equity and inclusion.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property. The proposed rule can be strengthened in the following ways:

- By accurately communicating the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after planting, SDCI is no longer concerned about the fate of the smaller, non-exceptional trees.
- Protecting red alders, black cottonwoods, and bitter cherries. These native trees provide important resources to birds and other wildlife and contribute to our sense of place in Seattle. Following the "right tree, right place" philosophy, these native trees can safely thrive and should be protected like other species.
- Expanding the definition of tree groves to stands of six or more trees at least six inches in diameter, including street trees. Tree groves provide important habitat for birds and are becoming less common outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove.
- Requiring public notice postings on development site and online for removal of Exceptional trees, even when hazardous, to ensure community members know when and where legal tree removal is occurring.
- Requiring replacement for trees removed from groves and removed hazard trees.
- Aligning SDCI's proposed Tree Care Provider Acknowledgement with SDOT's Tree Service Provider Registration. Do not automatically renew this form annually. It should be updated each year. Reduce the number of infractions tree service providers can incur in a year before they are removed from the City's list to do business from more than three infractions to more than two infractions.
- Section 4: Preference for planting off-site replacement trees on public property is restrictive. The Director should be able to allow replacement trees not only on public property, but also on private property, where desired by the property owner, in order to meet the City's goals and objectives of race and social justice under Seattle's Equity and Environment Initiative.

The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now, while continuing to work with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Thank you for your time and consideration.

Sincerely,

Conor Marshall  
712 N 42nd St Apt 202 Seattle, WA 98103-7283 ctmarshall85@gmail.com

---

From: kellyrwhite@everyactioncustom.com <kellyrwhite@everyactioncustom.com>

Sent: Monday, August 10, 2020 1:56 PM

To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

In this era of global warming, urban areas are especially prone to increased temperatures. Trees not only clean our air and take carbon out of the atmosphere, but they also cool the environment. Now is an especially crucial time to protect our urban trees. Please make sure that Seattle is a leader in strengthening our urban environmental protections.

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCI is no longer concerned about the fate of the smaller, non-exceptional trees.
- Protect red alders, black cottonwoods, and bitter cherries. These native trees provide important resources to birds and other wildlife and contribute to our sense of place in Seattle. Following the "right tree, right place" philosophy, these native trees can safely thrive and should be protected like other species.
- Expand the definition of tree groves to stands of six or more trees at least six inches in diameter, including street trees. Tree groves provide important habitat for birds and are becoming less common outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove.
- Require public notice postings on development site and online for removal of Exceptional trees, even when hazardous, to ensure community members know when and where legal tree removal is occurring.
- Require replacement for trees removed from groves and removed hazard trees.
- Align SDCI's proposed Tree Care Provider Acknowledgement with SDOT's Tree Service Provider Registration. Do not automatically renew this form annually. It should be updated each year. Reduce the

number of infractions tree service providers can incur in a year before they are removed from the City's list to do business from more than three infractions to more than two infractions.

- Section 4: Preference for planting off-site replacement trees on public property is restrictive. The Director should be able to allow replacement trees not only on public property, but also on private property, where desired by the property owner, in order to meet the City's goals and objectives of race and social justice under Seattle's Equity and Environment Initiative.

The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
Kelly White  
2846 44th Ave W Seattle, WA 98199-2427  
kellyrwhite@comcast.net

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**From:** David Moehring <dmoehring@consultant.com>

**Sent:** Sunday, August 9, 2020 11:58 PM

**To:** SCI\_Code\_Compliance <SCI\_Code\_Compliance@seattle.gov>

**Cc:** DOT\_LA <DOT\_LA@seattle.gov>; O'Brien, Mike <Mike.O'Brien@seattle.gov>; Bagshaw, Sally <Sally.Bagshaw@seattle.gov>; Juarez, Debora <Debora.Juarez@seattle.gov>; Jessica Dixon-Horton <bardjess@msn.com>; Barbara Bernard via Magnolia Tree Keepers - All messages <Magnolia-tree-keepers\_all@googlegroups.com>; seattle-tree-ordinance-working-group@lists.riseup.net; Steve ZemkeSAVEOURTREES <stevezemke@msn.com>; DOT\_SeattleTrees <Seattle.Trees@seattle.gov>; Annie Thoe <neighborhoodtreekeepers@gmail.com>; Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>; Torgelson, Nathan <Nathan.Torgelson@seattle.gov>; Emery, Chanda <Chanda.Emery@Seattle.gov>; Humphries, Paul <Paul.Humphries@seattle.gov>; SCI\_Code\_Compliance <SCI\_Code\_Compliance@seattle.gov>; Strauss, Dan <Dan.Strauss@seattle.gov>; Stuart Niven <panorarbor@gmail.com>

**Subject:** Record Number: 1048666-VI - 536 N 67th Street - Exceptional Western Red Cedar removed without permit

**CAUTION: External Email**

On behalf of those in Seattle seeking to retain Exceptional trees when possible, it was good to see the January 2020 letter from the SDCI inspectors relative to the unnecessary removal of the Exceptional Red Cedar in the alley-facing corner at 536 N 67th Street.

From the new site plan attached, it seems the removal could have been avoided by simply keeping out a few parking spaces.

Has the owner decided to replace the canopy lost, or will they pay the modest \$35,000 penalty?

David Moehring

TreePAC

Seattle - Phinney Ridge

September 21 1:15 PM



[Notice of Violation](#) 804 KB 01/15/20 [1048666-VI](#) Notice of Violation

<a href="#">Public Comment: Niven 10282019</a>	46 KB	10/30/19	<a href="#">005294-19PA</a>	Building & Land Use Pre-Application
<a href="#">Public Comment: Siems 10282019</a>	47 KB	10/30/19	<a href="#">005294-19PA</a>	Building & Land Use Pre-Application
<a href="#">Public Comment: Thaler 10282019</a>	48 KB	10/30/19	<a href="#">005294-19PA</a>	Building & Land Use Pre-Application

[Public Comment: Thoe 10282019](#) 49 10/30/19 [005294-19PA](#) Building & Land Use Pre-Application  
KB  
[Public Comment: D. Moehring 10-20-2019](#) 30 10/21/19 [6754334-CN](#) Construction Permit  
KB

**Sent:** Friday, October 18, 2019 at 12:17 PM

**From:** "Stuart Niven (via seattle-tree-ordinance-working-group Mailing List)" <[seattle-tree-ordinance-working-group@lists.riseup.net](mailto:seattle-tree-ordinance-working-group@lists.riseup.net)>

**To:** "David Moehring" <[dmoehring@consultant.com](mailto:dmoehring@consultant.com)>

**Cc:** "SCI\_Code\_Compliance" <[SCI\\_Code\\_Compliance@seattle.gov](mailto:SCI_Code_Compliance@seattle.gov)>, "DOT\_LA" <[DOT\\_LA@seattle.gov](mailto:DOT_LA@seattle.gov)>, "[mike.obrien@seattle.gov](mailto:mike.obrien@seattle.gov)" <[mike.obrien@seattle.gov](mailto:mike.obrien@seattle.gov)>, "Bagshaw, Sally" <[Sally.Bagshaw@seattle.gov](mailto:Sally.Bagshaw@seattle.gov)>, "[abel.pacheco@seattle.gov](mailto:abel.pacheco@seattle.gov)", "[deborajuarez@seattle.gov](mailto:deborajuarez@seattle.gov)" <[deborajuarez@seattle.gov](mailto:deborajuarez@seattle.gov)>, "Jessica Dixon-Horton" <[bardjess@msn.com](mailto:bardjess@msn.com)>, "Barbara Bernard via Magnolia Tree Keepers - All messages" <[Magnolia-tree-keepers\\_all@googlegroups.com](mailto:Magnolia-tree-keepers_all@googlegroups.com)>, "[seattle-tree-ordinance-working-group@lists.riseup.net](mailto:seattle-tree-ordinance-working-group@lists.riseup.net)" <[seattle-tree-ordinance-working-group@lists.riseup.net](mailto:seattle-tree-ordinance-working-group@lists.riseup.net)>, "Steve ZemkeSAVEOURTREES" <[stevezemke@msn.com](mailto:stevezemke@msn.com)>, "DOT\_SeattleTrees" <[Seattle.Trees@seattle.gov](mailto:Seattle.Trees@seattle.gov)>, "Abridged recipients" <[tree-ordinance-legal@googlegroups.com](mailto:tree-ordinance-legal@googlegroups.com)>, "Annie Thoe" <[neighborhoodtreekeepers@gmail.com](mailto:neighborhoodtreekeepers@gmail.com)>, "PRC" <[PRC@seattle.gov](mailto:PRC@seattle.gov)>, "Strauss, Daniel" <[Daniel.Strauss@seattle.gov](mailto:Daniel.Strauss@seattle.gov)>, "Pinto de Bader, Sandra" <[sandra.pinto\\_de\\_bader@seattle.gov](mailto:sandra.pinto_de_bader@seattle.gov)>, "jenny.durkanseattle.gov" <[jenny.durkan@seattle.gov](mailto:jenny.durkan@seattle.gov)>, "[nathan.torgelson@seattle.gov](mailto:nathan.torgelson@seattle.gov)", "[Chanda.Emery@seattle.gov](mailto:Chanda.Emery@seattle.gov)", "[Council@seattle.gov](mailto:Council@seattle.gov)", "[Peter.Holmes@seattle.gov](mailto:Peter.Holmes@seattle.gov)", "Humphries, Paul" <[Paul.Humphries@seattle.gov](mailto:Paul.Humphries@seattle.gov)>

**Subject:** [seattle-tree-ordinance-working-group] Record Number: 005294-19PA - 536 N 67th Street - Exceptional Western Red Cedar removed without permit

Thank you David for raising our attention to this situation and for providing the evidence of the recent removal. According to documents in the online portal, I can find no evidence of an arborist report documenting the tree as a 'hazard' and through looking back on Google Street view the tree is clearly on site as recently as May 2019.

There are photos in the SDCI inspector's 'Site Photos' that clearly show the remaining stump that due to the colour of the heart wood, it is evidence of the recent removal (see <https://cosaccela.seattle.gov/Portal/Cap/CapDetail.aspx?Module=DPDPermits&TabName=DPDPermits&capID1=19SCI&capID2=00000&capID3=18142&agencyCode=SEATTLE>)

Presuming this was carried out under the instruction of the current owner of the property, please find them in violation of DR2008-16 and fine them accordingly for the removal of a healthy, clearly 'exceptional' native Western red cedar.

We cannot continue to allow property owners / developers remove healthy trees like this, simply for the future development of sites. If the protocol of the SMC 25.11 and DR2008-11 was followed here, this tree would be protected and retained, but unlike some trees that are being removed due to weakness in the current tree ordinance, this tree was simply removed illegally.

Please review this and act accordingly. I will submit a complaint to SDCI as the system requires before the stump is removed and the site razed.

Thank you and kind regards,

Stuart Niven, BA(Hons)

*PanorArborist*

ISA Certified Arborist PN-7245A & Tree Risk Assessment Qualification (TRAQ)

Arborist on Seattle's Urban Forestry Commission

[www.panorarbor.com](http://www.panorarbor.com)

Tel/Text: 206 501 9659  
[WA Lic# PANORL\\*852P1](#)

On Tue, Oct 1, 2019 at 6:59 AM David Moehring <[dmoehring@consultant.com](mailto:dmoehring@consultant.com)> wrote:

Every week another one of Seattle's Environmental work-horse trees falls victim without detection. See the attached tree from this week at 536 N 67th Street. This is why permits are needed to be able to check before trees are removed.

 <https://www.seattle.gov/Documents/Departments/UrbanForestryCommission/Resources/DR2008-16xExceptionalTrees.pdf>

 If a stronger tree ordinance was pursued rather than debated, this would not have happened.

 Do be sure that the removal of Exceptional trees is not lifted from the criteria to remove a project for SEPA.

 Restore tree planting requirements of at least 2-inches of tree caliper for every 1000 sq Ft of lot area that was just removed with the Accessory Dwelling Unit legislation. This despite early promises and an FEIS that indicated no changes would be made to existing tree protections.

For TreePAC,  
Board member David Moehring

> [Man\_In\_Tree.JPG]

--- To unsubscribe: List help:

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**From:** Barbara Bernard <[barbara\\_bernard@yahoo.com](mailto:barbara_bernard@yahoo.com)>

**Sent:** Monday, August 10, 2020 7:38 AM

**To:** David Moehring <[dmoehring@consultant.com](mailto:dmoehring@consultant.com)>; SCI\_Code\_Compliance <[SCI\\_Code\\_Compliance@seattle.gov](mailto:SCI_Code_Compliance@seattle.gov)>

**Cc:** DOT\_LA <[DOT\\_LA@seattle.gov](mailto:DOT_LA@seattle.gov)>; O'Brien, Mike <[Mike.OBrien@seattle.gov](mailto:Mike.OBrien@seattle.gov)>; Bagshaw, Sally <[Sally.Bagshaw@seattle.gov](mailto:Sally.Bagshaw@seattle.gov)>; Juarez, Debora <[Debora.Juarez@seattle.gov](mailto:Debora.Juarez@seattle.gov)>; Jessica Dixon-Horton <[bardjess@msn.com](mailto:bardjess@msn.com)>; Barbara Bernard via Magnolia Tree Keepers - All messages <[Magnolia-tree-keepers\\_all@googlegroups.com](mailto:Magnolia-tree-keepers_all@googlegroups.com)>; [seattle-tree-ordinance-working-group@lists.riseup.net](mailto:seattle-tree-ordinance-working-group@lists.riseup.net); Steve ZemkeSAVEOURTREES <[stevezemke@msn.com](mailto:stevezemke@msn.com)>; DOT\_SeattleTrees <[Seattle.Trees@seattle.gov](mailto:Seattle.Trees@seattle.gov)>; Annie Thoe <[neighborhoodtreekeepers@gmail.com](mailto:neighborhoodtreekeepers@gmail.com)>; Pinto de Bader, Sandra <[Sandra.Pinto\\_de\\_Bader@Seattle.gov](mailto:Sandra.Pinto_de_Bader@Seattle.gov)>; Torgelson, Nathan <[Nathan.Torgelson@seattle.gov](mailto:Nathan.Torgelson@seattle.gov)>; Emery, Chanda <[Chanda.Emery@Seattle.gov](mailto:Chanda.Emery@Seattle.gov)>; Humphries, Paul <[Paul.Humphries@seattle.gov](mailto:Paul.Humphries@seattle.gov)>; SCI\_Code\_Compliance <[SCI\\_Code\\_Compliance@seattle.gov](mailto:SCI_Code_Compliance@seattle.gov)>; Strauss, Dan <[Dan.Strauss@seattle.gov](mailto:Dan.Strauss@seattle.gov)>; Stuart Niven <[panorarbor@gmail.com](mailto:panorarbor@gmail.com)>

**Subject:** Re: Record Number: 1048666-VI - 536 N 67th Street - Exceptional Western Red Cedar removed without permit

**CAUTION: External Email**

Do we know if it was contested or fine paid by the February deadline?

\*Barbara

[Sent from Yahoo Mail for iPhone](#)

On Sunday, August 9, 2020, 11:58 PM, David Moehring <[dmoehring@consultant.com](mailto:dmoehring@consultant.com)> wrote:

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**From:** Joyce Moty <[jmmoty@gmail.com](mailto:jmmoty@gmail.com)>

**Sent:** Monday, August 10, 2020 8:28 AM

**To:** [barbara\\_bernard@yahoo.com](mailto:barbara_bernard@yahoo.com)

**Cc:** David Moehring <[dmoehring@consultant.com](mailto:dmoehring@consultant.com)>; SCI\_Code\_Compliance <[SCI\\_Code\\_Compliance@seattle.gov](mailto:SCI_Code_Compliance@seattle.gov)>; DOT\_LA <[DOT\\_LA@seattle.gov](mailto:DOT_LA@seattle.gov)>; O'Brien, Mike <[Mike.O'Brien@seattle.gov](mailto:Mike.O'Brien@seattle.gov)>; Bagshaw, Sally <[Sally.Bagshaw@seattle.gov](mailto:Sally.Bagshaw@seattle.gov)>; Juarez, Debora <[Debora.Juarez@seattle.gov](mailto:Debora.Juarez@seattle.gov)>; Jessica Dixon-Horton <[bardjess@msn.com](mailto:bardjess@msn.com)>; Barbara Bernard via Magnolia Tree Keepers - All messages <[Magnolia-tree-keepers\\_all@googlegroups.com](mailto:Magnolia-tree-keepers_all@googlegroups.com)>; seattle-tree-ordinance-working-group@lists.riseup.net; Steve Zemke <[stevezemke@msn.com](mailto:stevezemke@msn.com)>; DOT\_SeattleTrees <[Seattle.Trees@seattle.gov](mailto:Seattle.Trees@seattle.gov)>; Annie Thoe <[neighborhoodtreekeepers@gmail.com](mailto:neighborhoodtreekeepers@gmail.com)>; Pinto de Bader, Sandra <[Sandra.Pinto\\_de\\_Bader@Seattle.gov](mailto:Sandra.Pinto_de_Bader@Seattle.gov)>; Torgelson, Nathan <[Nathan.Torgelson@seattle.gov](mailto:Nathan.Torgelson@seattle.gov)>; Emery, Chanda <[Chanda.Emery@Seattle.gov](mailto:Chanda.Emery@Seattle.gov)>; Humphries, Paul <[Paul.Humphries@seattle.gov](mailto:Paul.Humphries@seattle.gov)>; Strauss, Dan <[Dan.Strauss@seattle.gov](mailto:Dan.Strauss@seattle.gov)>; Stuart Niven <[panorarbor@gmail.com](mailto:panorarbor@gmail.com)>

**Subject:** Re: [seattle-tree-ordinance-working-group] Record Number: 1048666-VI - 536 N 67th Street - Exceptional Western Red Cedar removed without permit

**CAUTION: External Email**

Well this tree is as good as dead. What an ugly mess. Good example of a tree butcher posing as an arborist.

Joyce

On Aug 10, 2020, at 7:37 AM, Barbara Bernard (via seattle-tree-ordinance-working-group Mailing List) <[seattle-tree-ordinance-working-group@lists.riseup.net](mailto:seattle-tree-ordinance-working-group@lists.riseup.net)> wrote:

Do we know if it was contested or fine paid by the February deadline?

\*Barbara

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From: [martincat@everyactioncustom.com](mailto:martincat@everyactioncustom.com) <[martincat@everyactioncustom.com](mailto:martincat@everyactioncustom.com)>

Sent: Monday, August 10, 2020 4:49 PM

To: Pinto de Bader, Sandra <[Sandra.Pinto\\_de\\_Bader@Seattle.gov](mailto:Sandra.Pinto_de_Bader@Seattle.gov)>

Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCI is no longer concerned about the fate of the smaller, non-exceptional trees.
- Protect red alders, black cottonwoods, and bitter cherries. These native trees provide important resources to birds and other wildlife and contribute to our sense of place in Seattle. Following the "right tree, right place" philosophy, these native trees can safely thrive and should be protected like other species.
- Expand the definition of tree groves to stands of six or more trees at least six inches in diameter, including street trees. Tree groves provide important habitat for birds and are becoming less common outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove.
- Require public notice postings on development site and online for removal of Exceptional trees, even when hazardous, to ensure community members know when and where legal tree removal is occurring.
- Require replacement for trees removed from groves and removed hazard trees.
- Align SDCI's proposed Tree Care Provider Acknowledgement with SDOT's Tree Service Provider Registration. Do not automatically renew this form annually. It should be updated each year. Reduce the number of infractions tree service providers can incur in a year before they are removed from the City's list to do business from more than three infractions to more than two infractions.
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The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
melodie martin  
2339 11th Ave E Seattle, WA 98102-4013  
martincat@earthlink.net

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**From:** David Moehring <moehringconsultant@gmail.com>

**Sent:** Monday, August 10, 2020 10:25 PM

**To:** PRC <PRC@seattle.gov>; SCI\_Microfilm <DPD\_Microfilm@seattle.gov>; DOT\_LA <DOT\_LA@seattle.gov>

**Cc:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>; Emery, Chanda <Chanda.Emery@Seattle.gov>

**Subject:** More of Seattle's urban forest clears as rowhouses rowhouse development rules are circumvented

**CAUTION: External Email**

These townhouses and rowhouses are likely already being built... but are there plans showing that all 8 trees already removed?

Also, thank you for allowing public comment. But how does one comment without seeing the ULS site plans and proposed site plan with outline of the buildings?

Please provide all of the site plans on SDCI EDMS website for the 6-unit development at **1119 NW 57TH ST** and **1119 NW 57TH ST** (recently upzoned last year to LR2(M1).)

Please also keep the neighbors informed of adjacent forthcoming tree clearings at 1123 NW 57TH ST, 1125 NW 57TH ST, and 1133 NW 57TH ST (all recently purchased by different development companies.

Please assure that **Seattle's tree protections** being enforced. What design departures were implemented, if any, within this LR2(M1) zone to retain large trees? The arborist report prepared for Alex Mason has no photos in the report but claims the Western Red Cedar was only 34" DBH...and a couple of multi-trunk lawson cypress are also indicated to be only 32" DBH. Is City arborists verifying the close DBH values and species? Will any of these large trees be retained following the short plat subdivision which was to maximize the retention of existing trees by criteria #6? The Net Result? *Increasing Seattle's Urban Heat Island ranking from #10 nationwide.*

*Pro-development that also considers space for trees to counter local climate change.*

David Moehring  
TreePAC Volunteer

[Arborist Report](#) 320 KB 12/18/19 [6758839-CN-001](#) Construction Application Intake

# Species Dbh CSD Condition and Status

- 1 Arborvitae (Thuja occidentalis) 4 4 Good condition and health. Not exceptional.
- 2 Arborvitae (Thuja occidentalis) 4 4 Good condition and health. Not exceptional.
- 3 Colorado blue spruce (Picea pungens) 16 14 Good condition and health. Not exceptional.
- 4 Western red cedar (Thuja plicata) 17 34 Fair condition and health. Not exceptional.
- 5 Lawsons cypress 28 32 Fair condition. Multiple trunks (Chamaecyparis lawsoniana) from topping. Not exceptional.
- 6 Lawsons cypress 20 32 Fair condition. Multiple trunks from topping. Not exceptional.
- 7 Saucer magnolia 6 16' Good condition and health. Not exceptional.

What about the big ponderosa pine at the street?

Rowhouses at street Address:1119 NW 57TH ST

Project:3036708-LU

Area: North/Northwest

Notice Date:8/10/2020

Project Description Land Use Application to subdivide one development site into three unit lots. The construction of residential units is under Project #6759358-CN. This subdivision of property is only for the purpose of allowing sale or lease of the unit lots. Development standards will be applied to the original parcel and not to each of the new unit lots.

Townhouse behind rowhouses Address:1117 NW 57TH ST

Where is 191200-ULS\_1117.pdf SDCI\_EXT\_PREAPPLICATION/Site Plan 06/10/2020

Project:3036709-LU

Area: North/Northwest

Notice Date:8/10/2020

Project Description Land Use Application to subdivide one development site into three unit lots. The construction of residential units is under Project #6758839-CN. This subdivision of property is only for the purpose of allowing sale or lease of the unit lots. Development standards will be applied to the

original parcel and not to each of the new unit lots. Comments may be submitted through:08/24/2020

KHALEGHI

SALMAN

Address: 1126 NW 57TH ST 9810

NEWMAN JONATHAN

D

Address: 1124 NW 57TH ST 98107

: ALQUIST MARGARET

Address: 1112 NW 57TH ST 98107

WONG CANDICE

Address: 1118 NW 57TH ST 98107

NIEMER MARY

Address: 1101 NW 57TH ST  
98107

BROCKMAN FRANK W JR

Address: 1107 NW 57TH ST 98107

BAISDEN THOMAS

+AMELIA

Address: 1113 NW 57TH ST 98107

XU RUI+YOSHIDA

ELDER

Address: 1147 NW 57TH ST 98107

WENDEL JOHN

NICKERSON

Address: 1143 NW 57TH ST 98107

MEGHAAN M

BLAUVELT

Address: 1137 NW 57TH ST 98107

---

**From:** David Moehring <dmoehring@consultant.com>  
**Sent:** Monday, August 10, 2020 10:33 PM  
**To:** PRC <PRC@seattle.gov>; Strauss, Dan <Dan.Strauss@seattle.gov>  
**Cc:** Pederson, Art <Art.Pederson@seattle.gov>; treepac\_seattlelists.riseup.net <treepac\_seattle@lists.riseup.net>; seattle-tree-ordinance-working-grouplists riseup. net <seattle-tree-ordinance-working-group@lists.riseup.net>; Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>; An, Noah <Noah.An@seattle.gov>; Emery, Chanda <Chanda.Emery@Seattle.gov>  
**Subject:** Who cut down Exceptional tree for developer at 2014 NW 63RD ST 3036205-LU ??

**CAUTION: External Email**

Yet another case in Ballard of owner being induced to **removing large trees BEFORE closing the property** over to the developer.

Will the new Director's Rule being proposed for Exceptional trees stop pre-closing Exceptional tree removals? Will SDCI inspectors report these as the document them?

A posted site photos in Feb 2020 for the permit application for **2014 NW 63RD ST** included the proof that an existing paper birch tree was cut down prior to the transition to the developer (species and size not verified by city arborist).

Per Director's Rule, Paper Birch "Betula papyrifera" are exceptional at 1 ft 8 inch DBH. The photos show tree fragments that appear to be at least that large.

Please verify where the arborist report is prior to this tree being removed. The PASV states that Dave Biddle of Blueprint (typically a surveyor and expediter) was also the authorized property owner. [6777539-CN](#)

After the LBA, the lot size of 5,084 Sq Ft will accommodate 4 townhouses. Why is the notice including the construction permit number for the adjacent housing project; and was the adjacent former Ballard Baptist Church knowledgeable about the LBA that sliced about 100 sq ft from their property\*\*?

DAVE B BIDDLE

Address: PO BOX 16438 Address: PO BOX 16438

City: SEATTLE City: SEATTLE

Email: [permitting@blueprintcap.com](mailto:permitting@blueprintcap.com) Email: [permitting@blueprintcap.com](mailto:permitting@blueprintcap.com)

Phone: (206) 829-3128 Phone: (206) 829-3128

Address:2014 NW 63RD ST

Project:3036205-LU

Area: North/Northwest

Notice Date:8/10/2020

Project Description Land Use Application to subdivide one development site into **four unit lots**. The construction of residential units is under Project #6773649-CN. This subdivision of property is only for the purpose of allowing sale or lease of the unit lots. Development standards will be applied to the original parcel and not to each of the new unit lots.

David Moehring

312-965-0634



New owner of Church for HOUSING

Project Address 2010 NW 63RD ST

SEATTLE, WA 98107

Contact Phone (206) 829-3128

Contact Email [permitting@blueprintcap.com](mailto:permitting@blueprintcap.com) Address Seattle Department of Construction and

SDCI Reviewer Prithy Korathu Inspections  
Reviewer Phone 700 Fifth Ave  
Reviewer Email [Prithy.Korathu@seattle.gov](mailto:Prithy.Korathu@seattle.gov) Suite 2000  
Owner Kanebuilt, LLC.

---

**From:** Stuart Niven <panorarbor@gmail.com>

**Sent:** Tuesday, August 11, 2020 8:31 AM

**To:** Durkan, Jenny <Jenny.Durkan@seattle.gov>; LEG\_CouncilMembers <council@seattle.gov>; Torgelson, Nathan <Nathan.Torgelson@seattle.gov>; Emery, Chanda <Chanda.Emery@Seattle.gov>; Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>; DOT\_SeattleTrees <Seattle.Trees@seattle.gov>; Pedersen, Alex <Alex.Pedersen@seattle.gov>; Strauss, Dan <Dan.Strauss@seattle.gov>; Pederson, Art <Art.Pederson@seattle.gov>; McGarry, Deborah <Deborah.McGarry@seattle.gov>

**Cc:** David Moehring <Dmoehring@consultant.com>; Josh Morris <Joshm@seattleaudubon.org>; Steve Zemke <stevezemke@msn.com>; Humphries, Paul <Paul.Humphries@seattle.gov>; Annie Thoe <neighborhoodtreekeepers@gmail.com>; Sandy Shettler <sshettler@msn.com>; dmitriy@americanclassichomes.com; didisaluja@gmail.com; Jenny Cunningham <jennycunninghamwrites@gmail.com>; Kathleen Russell <saveshorelinetrees@gmail.com>; Martha Baskin <mobaskin@earthlink.net>; C.E. Bick <celzbick@gmail.com>; Lynda Mapes <lmapes@seattletimes.com>; rsarmento@komotv.com

**Subject:** Sixty Year Old Seattle & Northwestern Native Murdered near Green Lake yesterday morning.

**CAUTION: External Email**

Good morning, afternoon or evening,

Most of you will likely not know anything about the following news item which has been void of radio, television or internet coverage yet should be in the headlines. In brief the story reads as follows:

After approximately sixty years of peaceful existence, a sixty feet tall native of Seattle and the Pacific Northwest was murdered by Man during the morning of Monday the 10th of August 2020, cut with a roaring chainsaw and dropped to the ground unceremoniously within thirty painful minutes, following the City of Seattle's Department of Destruction, I mean Construction and Inspections (SDCI) permitted removal of a healthy native Western hemlock as part of the 'development' of a 'single family property' at 7540 Sunnyside Ave N near Green Lake.

According to the developer's arborist's report the tree was in 'poor condition', 'infested by insects' and should be removed. The insect referenced, known as the 'woolly adelgid' is not currently known to cause any adverse health or structural issues with Western hemlocks if the host tree is relatively healthy. The tree was measured to have a diameter of 22.5 inches 'at breast height' (also known as 'DBH' which is measured at 4.5 feet above the ground) which means it is not currently protected from removal under any circumstances. That is to say, anyone at any time for any reason can remove a tree of this size from any property within Seattle's city limits. From what I saw last week, this particular hemlock was in relatively good condition, was growing within six feet of a larger native Western red cedar supposedly 29.5" in diameter (according to the developer's arborist) and based on my knowledge and experience as a climbing and consulting arborist, there was absolutely no reason whatsoever for

recommending the removal or even pruning of either of these trees. They were peacefully cohabiting practically the same space, had been for many decades and could have been for many more.

For the past sixty years or so, the two trees had been sharing not only a canopy but also water, nutrients, sunlight, wind, snow, insects, animals, birds, bats, owls, eagles and a myriad of microscopic lifeforms; shading other wildlife including humans for many years also, reducing pollutants in the air, slowing the rain fall that reaches the ground, helping reduce the volume that runs into drains and into the Puget Sound. The cedar, now with no protection from its cousin, will be thrust into a situation beyond its control and will have to deal with dramatically increased amounts of sunlight, wind and other climatic elements. This will include a dramatic change in the exchange of water, nutrients and even information through the shared root system, which will from this day forth be dramatically changed forever as the dead hemlock's roots decompose.

On the face of it, from our human perspective this may not seem like a great loss or anything to be concerned about but through years of research into how trees and plants co-exist in a range of environments, it has become widely accepted that trees communicate with each other, even across species variations, through a complex network of microscopic fungi known as 'mycorrhizae', sending both positive and negative messages about threats to health and structure, as well as about beneficial elements such as insect activity and nutrient sources. This is only the beginning of what we are learning of the interplay between trees and the many interactions that take place during their existence. We may eventually understand enough to translate what is being said between trees, which makes me imagine the dialogue between these two cousins, likely planted or germinated from natural propagation at the same time or within a few years of one another.....

"Morning Hemlock, how was your night?", asked Cedar not long after sunrise this morning.

"Wonderful, that stealthy owl was perching on its favourite branch in between rodent catching and there was a lovely cool breeze tickling my foliage," Hemlock replied.

"Yes, I felt the same light movement through my arms too. I hope it won't be as hot today as Birch nextdoor was forecasting as I really struggle with temperature regulation these days and I know many of our cousins have died recently with the increased heat and drier, longer Summers," pondered Cedar.

"Me too, I do prefer the cooler wetter days and am looking forward to Autumn to wet my toes. Hello Robin, welcome back; watch out for Squirrel, he is playing up and down my stem chasing his siblings and might knock you from your perch!"

Suddenly, the peaceful interaction was disrupted by a truck door slamming. "Hey Hemlock, what is that man doing over there?" Cedar inquired.

"I don't know but he looks scary and isn't that one of those nasty torture devices that cuts our limbs off and has killed millions of our kin over the years; like an axe but much much worse?" Hemlock responded, audibly concerned.

"He's coming over to us and yes, he's carrying a chainsaw," Cedar announced fearfully. "Can we help you Man?"

"I don't think he is listening or cannot understand you Cedar. What does he have on his feet?"

"Oh no, Hemlock, they are spikes.....that only means one thing.....Man is going to cut one of us or both

of us down, I have seen this happen before, elsewhere in the neighbourhood!" Cedar nervously stated, shocked.

"Ouch, get off me. Cedar, he has started climbing me, spiking my flesh.....Oi, get off me!" Hemlock shouted.

"He cannot hear you, or is not listening, Hemlock.....he is starting his machine...cough, splutter, that's nasty....horrible fumes and oil spurting from it. Stop it, leave Hemlock alone!" Cedar pleaded.

"Help, he's cutting my limbs off, help me.....help me.....please stop, PLEASE!!." Hemlock's cries of pain were barely audible over the ripping and roaring sounds of the revving chainsaw. Within moments Man was cutting deep into Hemlock's body. "He is going to cut me in half, what is going on? How can this be? What did I do wrong? Does my existence not mean anything to Man? Cedar, I'm going to die. I'm scared."

Man cuts the top half off Hemlock, leaving a limbless form, descends then prepares to finish his murdering. "This is it, I have nothing left; no limbs, no top and now Man is cutting at my ankles, I'm going to fall to the ground, still living but unable to breath, sap running from my veins, dying slowly and painfully and Man does not care! Goodbye Cedar, I will forever miss you my cousin." Hemlock's final words before Man cut through the base of Hemlock and the rest of Hemlock fell onto the broken and smashed branches before turning off the chainsaw, brushing off Hemlock's woody cells, getting in his truck and driving off without a care in the world for the murder he just committed.

Trees are living organisms. They are not moveable, replaceable and insignificant parts of a property, like a shed or a swing set. They take decades to grow and evolve, often in close proximity to other trees and plants and they rely on the network of hidden lifeforms to maintain their healthy existence. The current tree code in Seattle is completely ignoring this proven fact, with a black and white code that does not take into account the complex symbiosis between trees and the variety of site conditions on each and every property. This must be changed and trees must be looked at on a site by site basis to work out exactly how it will be best to retain and truly protect healthy trees, regardless of size so that we have a healthy and evolving urban tree canopy with a thriving ecology that co-exists with all of the trees and plants.

This site is already a threat to the existing cedar tree and as it stands, when I visited the site yesterday morning there was no tree protection in place around the cedar tree while an excavator ripped up the ground and will likely dispose of Hemlock's lifeless body, into a dumpster or dump truck to be carried away from its home and its family with not even a moment to honour its life. The cedar will be exposed to more sunlight today and every day than ever before, its roots will be shocked and when the wind returns later this year, it will suddenly be loaded with increased stresses that will increase the chances of branch and stem failure. Coupled with unknown impacts during the groundwork and possible root damage and compaction during the construction process, the future of Cedar is unknown but it is dramatically more depressing and stressful than it has been for the past 60 years or so.

Furthermore, according to the plans for the new building, the hemlock tree did not need to be removed. There is only going to be one building on the property and there was plenty of room around the site to place the building and retain both the hemlock and cedar trees. This removal is senseless and

destructive, serving no real purpose beyond exerting man's control over nature. This will not be the only healthy tree removed today, as permitted and illegal removals continue while the City of Seattle sits idly by and allows developers to continue to rape and pillage the urban canopy and the interwoven ecology and environment which a multitude of lifeforms call home, including human residents for no other reason than greed. The developer responsible lives on Mercer Island, so does not even have to experience the results of his destruction, beyond the profit gained. However, the neighbours on all sides of this property will experience the results, especially if the remaining cedar tree declines and is removed or fails in a wind storm. This negative impact adds to all of the other removals of healthy trees in Seattle in a cumulative way, just like frogs in a pot of water being brought to the boil, to such a degree that by the time the resulting effects are felt by everybody, it will already be too late to escape them.

Seattle not only needs a radically much stronger tree protection ordinance and code that actually protects trees of all sizes (all trees over 6" DBH would be a good place to start), especially our native trees that should be revered and honoured without question. It must acknowledge that trees are living organisms, truly organic and cannot be looked at through a rigid set of rules. Every tree on every property is different so we must adapt and evolve, just like they do and instead of thoughtlessly condemning trees and removing them because they are in the way of achieving the supposed 'development potential', we must respect their truly awesome benefits and work with them, incorporating them into the landscape and helping nurture them for many generations of all lifeforms to come. Developers should not have special privileges, allowing them to remove more trees, larger trees and healthy trees, while long term residents must abide by the already weak regulations. This is discrimination, unethical and screams of inequity. If a developer has no other option but to remove a tree, at least charge them an amount that adequately represents the true value of the tree so that that money can be put into a fund to help provide free trees to the City, helping re-forest Seattle.

Please open your eyes to what is happening to the Seattle urban canopy and stop this wanton destruction. We are better than this and can easily find practical solutions to both the need for increased density, affordable housing and retain, protect and even grow our urban canopy and ecosystems.

*Requiescat in pace* Hemlock.

Thank you and kind regards,

Stuart Niven, BA (Hons)

*PanorArborist*

[ISA Certified Arborist PN-7245A & Tree Risk Assessment Qualification \(TRAQ\)](#)

[Arborist on Seattle Audubon Society Conservation Committee](#)

[Arborist on Seattle's Urban Forestry Commission](#)

[Board Member of TreePAC](#)

Company Website [www.panorarbor.com](http://www.panorarbor.com) Tel/Text: 206 501 9659

[WA Lic# PANORL\\*852P1](#) (Click to link to WA L&I's Verify a Contractor Page)



From: a-oleary@everyactioncustom.com <a-oleary@everyactioncustom.com>  
Sent: Tuesday, August 11, 2020 10:01 AM  
To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

Don't let developers dictate how our city spaces are used- keep public spaces and habitat for all living things.

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCI is no longer concerned about the fate of the smaller, non-exceptional trees.
- Protect red alders, black cottonwoods, and bitter cherries. These native trees provide important resources to birds and other wildlife and contribute to our sense of place in Seattle. Following the "right tree, right place" philosophy, these native trees can safely thrive and should be protected like other species.
- Expand the definition of tree groves to stands of six or more trees at least six inches in diameter, including street trees. Tree groves provide important habitat for birds and are becoming less common outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove.
- Require public notice postings on development site and online for removal of Exceptional trees, even when hazardous, to ensure community members know when and where legal tree removal is occurring.
- Require replacement for trees removed from groves and removed hazard trees.
- Align SDCI's proposed Tree Care Provider Acknowledgement with SDOT's Tree Service Provider Registration. Do not automatically renew this form annually. It should be updated each year. Reduce the number of infractions tree service providers can incur in a year before they are removed from the City's list to do business from more than three infractions to more than two infractions.
- Section 4: Preference for planting off-site replacement trees on public property is restrictive. The Director should be able to allow replacement trees not only on public property, but also on private property, where desired by the property owner, in order to meet the City's goals and objectives of race and social justice under Seattle's Equity and Environment Initiative.

The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
Anne Brink  
6706 Earl Ave NW Seattle, WA 98117-5929 a-oleary@q.com

**From:** John <john.nuler@gmail.com>  
**Sent:** Tuesday, August 11, 2020 11:44 AM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Parks Dept. Tree Care

**CAUTION: External Email**

Urban Forestry Commission,

A private contracting crew has been demolishing the house at 7137 38th Ave SW. This is property recently acquired by Parks as an addition to the Orchard Street Ravine Park.

They are not doing any dust mitigation (sprinklers) and we witness clouds (asbestos, lead and DDT?) from our house. A visit to the site shows disregard for ECA Steep Slope regulations as they have covered the ECA fence with debris. The protective fencing placed for an 40" dia exceptional cedar has been covered with debris. They have approached the house from the south with a large excavator tearing up the ECA Steep Slope plantings causing damage to the park. Their permit states access from the north which would not have been damaging.

I called in a complaint and filed one online with Seattle DCI, but the que is long and the damage will continue.

The parks Dept Architect responsible Redi Karameto submitted false and incomplete surveys, plans and documents that can be seen at DCI.

I filed a complaint and contacted Redi was either not aware of the ECA codes or are allowing abuse of them.

ECA Analysis

Pursuant to SMC 25.09.045 Exemptions, “[c]ity agencies taking the action under any subsection of this Section 25.09.045 and a public agency taking the action under subsection 25.09.045.J do not need to make an application to the Director, provided that, if no application is made, they shall comply with all provisions of this Section 25.09.045, make all determinations required to be made by the Director, including required conditions, and maintain records documenting compliance with all provisions.”

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The provisions of 25.09.045 have not been followed. The ECA survey does not comply with ECA 25.09. The Steep Slope and Steep Slope Buffers are required. All trees must be located and labeled by species. The Survey Plan you sent is not the plan that is being followed. The document plan does not encroach into park and Steep Slopes areas. You claimed that in discussions with the contractor the project was changed. Changes that include encroaching into ECA Steep Slope and Parkland and not provide required tree protection are not allowed. No ECA Standard Mitigation Plan has been sent to me. This also is required under 25.09. Please update all plans and send them to me.

-----

Orchard Street Ravine Demo Page 2

November 18, 2019

required conditions, and maintain records documenting compliance with all provisions.”1 I - Structure maintenance of existing public facilities and utilities provides that the

“[o]peration, maintenance, remodeling, repair, and removal of existing public facilities and

utilities, if these activities are normal and routine and if these activities do not result in substantial disturbance or adverse impacts of environmentally critical areas or buffers.”

You state,

"All existing trees and any native vegetation will be protected in place and appropriate BMPs will be implemented. It is unlikely that the proposed demolition and restoration will result in substantial disturbance of the underlying Steep Slope ECAs."

This responsibility has not been carried out. Who do I make a complaint to?

Please let me know who your supervisor is.

John Nuler

No inspector or city representative was present. I was told to leave "for my own safety."



---

**From:** John <john.nuler@gmail.com>

**Sent:** Tuesday, August 11, 2020 11:59 AM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Re: Parks Dept. Tree Care

**CAUTION: External Email**

Please post these documents regarding Seattle Parks disregard of Parks Property, Exceptional Trees, Parks Flora and Fauna and ECA Steep Slope and slide regulations.

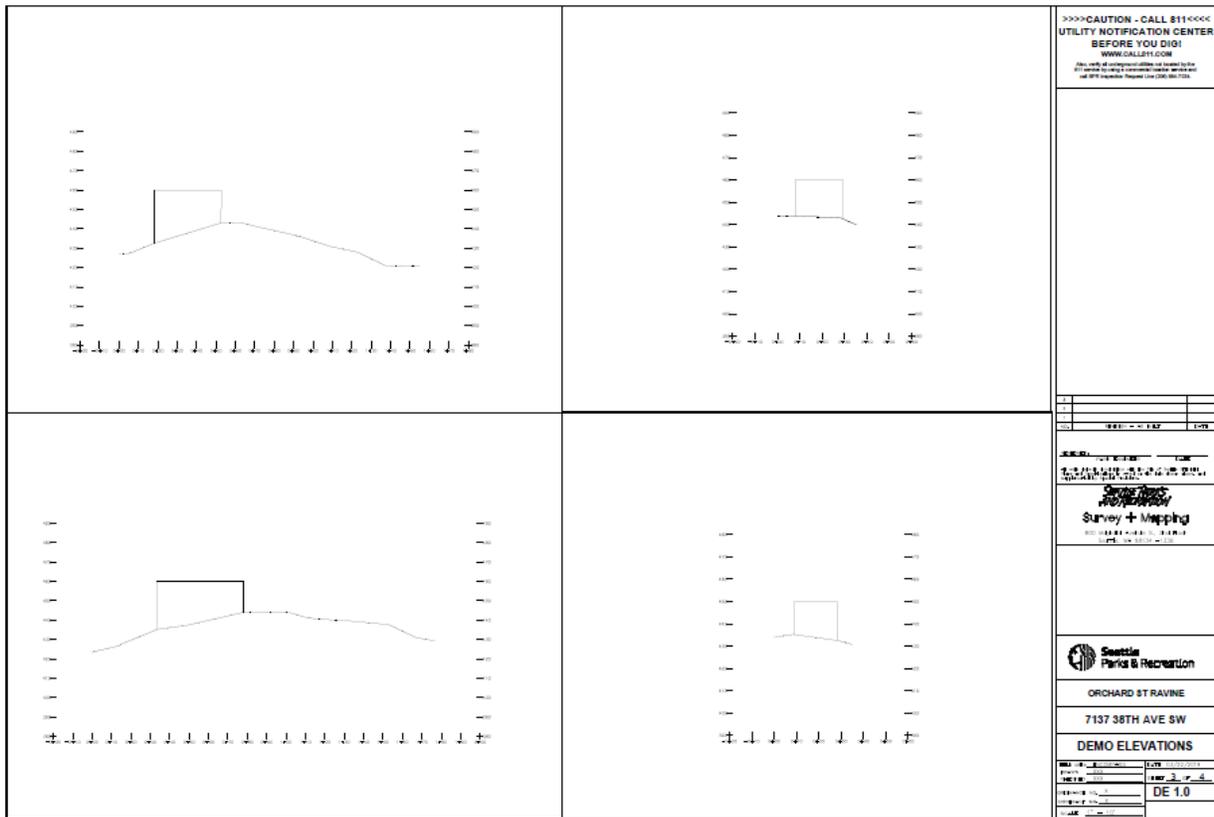
The Parks has not followed any part of the submitted plans and encroached into the critical areas contrary to the plans and permit.

The Exceptional Cedar was not properly fenced off and the construction area fence was buried in toxic house debris covering the base of the tree and all of its drip-line. The permitted route for removing demolition debris would have avoided this EXCEPTIONAL Cedar and encroaching into established Park and Steep Slope. That approved route was not followed.

The survey shown does not comply with Seattle ECA Requirements. The Critical Areas are not shown nor are the types of trees identified.

How will the proposed changes affect illegal activities by the Parks Dept and other city agencies currently ignoring the codes?





CAUTION - CALL 811  
 UTILITY NOTIFICATION CENTER  
 BEFORE YOU DIG!  
 WWW.CALL11.COM  
 Also, notify your contractor of the location of all existing underground utilities before any excavation work is done. Call 811 to report a problem or to request a copy of the 811 map.

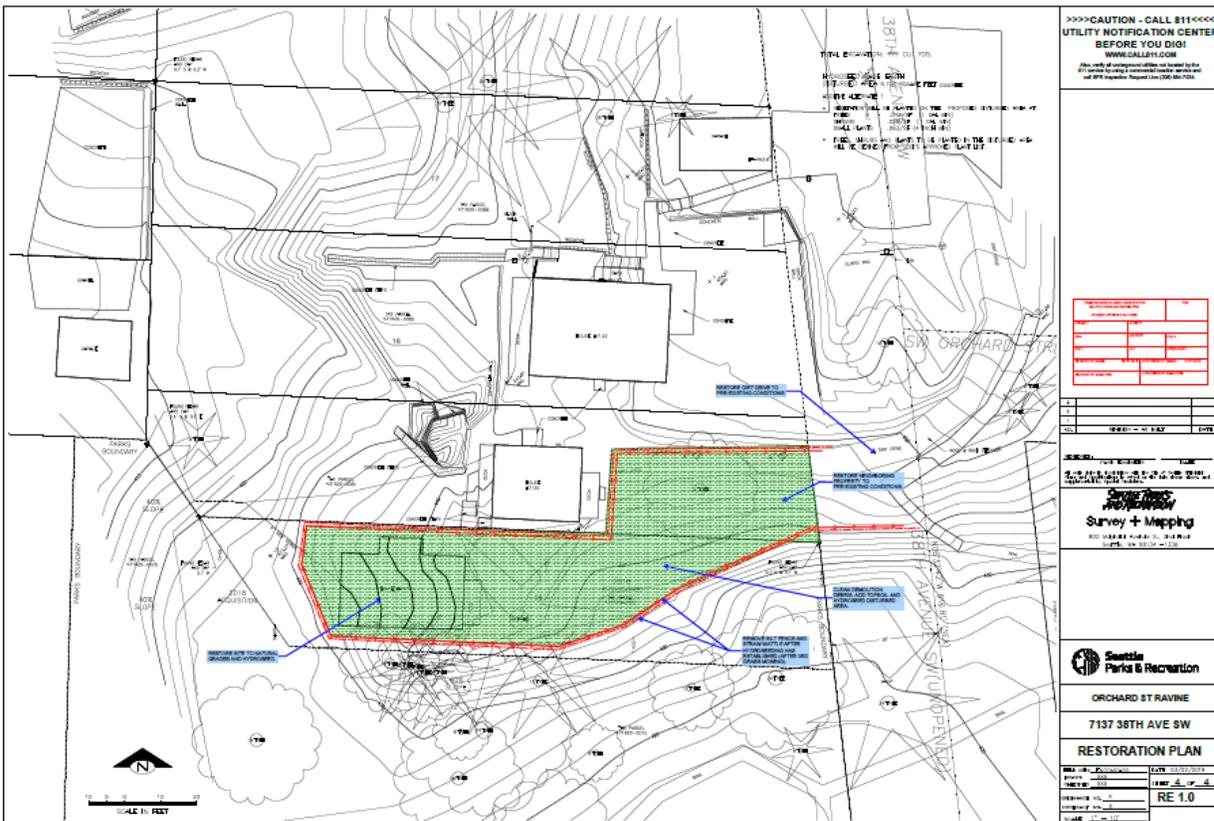
DATE	1/12/2011
TIME	1:00 PM
PROJECT	ORCHARD ST RAVINE RESTORATION
CLIENT	SEATTLE PARKS & RECREATION
LOCATION	7137 38TH AVE SW
SCALE	DE 1.0

**Seattle Parks & Recreation**

ORCHARD ST RAVINE  
 7137 38TH AVE SW

**DEMO ELEVATIONS**

DATE	1/12/2011
TIME	1:00 PM
PROJECT	ORCHARD ST RAVINE RESTORATION
CLIENT	SEATTLE PARKS & RECREATION
LOCATION	7137 38TH AVE SW
SCALE	DE 1.0



CAUTION - CALL 811  
 UTILITY NOTIFICATION CENTER  
 BEFORE YOU DIG!  
 WWW.CALL11.COM  
 Also, notify your contractor of the location of all existing underground utilities before any excavation work is done. Call 811 to report a problem or to request a copy of the 811 map.

DATE	1/12/2011
TIME	1:00 PM
PROJECT	ORCHARD ST RAVINE RESTORATION
CLIENT	SEATTLE PARKS & RECREATION
LOCATION	7137 38TH AVE SW
SCALE	RE 1.0

**Seattle Parks & Recreation**

ORCHARD ST RAVINE  
 7137 38TH AVE SW

**RESTORATION PLAN**

DATE	1/12/2011
TIME	1:00 PM
PROJECT	ORCHARD ST RAVINE RESTORATION
CLIENT	SEATTLE PARKS & RECREATION
LOCATION	7137 38TH AVE SW
SCALE	RE 1.0

**From:** James Davis <jamesdavis1400@gmail.com>

**Sent:** Tuesday, August 11, 2020 12:41 PM

**To:** Emery, Chanda <Chanda.Emery@Seattle.gov>; Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Comments on SDCI Directors Rule 13-2020 Regarding Protection of Trees

**CAUTION: External Email**

Thank you for your efforts to protect Seattle's remaining large trees. I would like to comment on Director's Rule 13-2020

Summary

1. Acknowledgement Document and Name of Company Posted in Window of Truck
2. Construction Companies Included in Acknowledgement Process
3. Not Including Trees on Site Plan Should Have a Penalty
4. Not Including Exceptional Trees in Arborist Reports Should Have a Penalty
5. Retroactive Application to Have Cut Down Tree Declared Hazardous Should Have Automatic Penalty
6. Ensure Access of Inspectors
7. Take Added Steps to Protect Trees in Neighborhoods with Low Percentages of Tree Canopy

1. In reviewing the Tree Care Provider Acknowledgement section I will comment that the trucks should have a specific posting that is visible to the public that they have signed the acknowledgement form. There should also be a requirement also that the name of the company be posted so the public can see it. For example, they can put these documents taped to the windows for the job. Additionally, there should be a requirement that a copy of the permit to cut down an Exceptional Tree be posted also.

With Angie's List now facilitating bidding for tree removals, we are seeing companies from all over coming in to do jobs here in Seattle. Everett, Kirkland, Monroe, and Olympia companies are showing up right here in my neighborhood. They don't know the rules. We have to control this hopefully through the provider registration process.

2. Having just watched two Exceptional Trees theoretically protected have the construction crews push aside the protective fencing and bulldoze the root systems to the very tree trunks, I would comment that construction companies should also have to sign an acknowledgment form. Additionally, if an Exceptional Tree is significantly maimed and damaged during the construction process and an independent arborist states the life of the tree has been compromised, then a penalty based on a tree being illegally cut down should be applied.

3. In reviewing the Exceptional Trees During Platting, I will comment there should be a penalty when the site plan neglects to have the actual tree(s) put on it. I recently saw a case of a mature evergreen that was cut down and the tree wasn't on the site plan submitted.

4. There should also be a penalty when the arborist reports are inaccurate. There was a recent example of this in which the arborist report did not indicate an Exceptional Grove of Trees. The developer apologized in the public hearing and said he would have the arborist re-submit the report.

5. There should be a penalty amount of at least \$1000 for the retroactive hazardous tree removal application process, if outside of an immediate emergency action. It is fairly hard for the city to demonstrate a tree could have been pruned instead of cut down after the tree has been cut down. Inspectors see this retroactive application to declare a tree hazardous as a way to get around penalties and there should be an automatic penalty to implement this process since the rules were not followed in the first place.

6. There should be language that empowers access by inspectors. I believe the current standards are that an inspector can go anywhere a mail delivery person can. It should be that an inspector can go anywhere a utility inspector can go, at the very least.

7. Please make special efforts to protect trees in neighborhoods with lower percentages of tree canopy such as increasing penalty amounts associated with tree removals in these specific zip codes or census tracts.

Finally, without funding for legal back up to SDCI, and the subsequent reversals of enforcement actions in the appeal process, many of these efforts will be limited in strength.

Again, I appreciate efforts to ensure there are life-enhancing large trees across all our city for this generation and future generations.

Jim Davis

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From: taneastephens@everyactioncustom.com <taneastephens@everyactioncustom.com>

Sent: Tuesday, August 11, 2020 12:47 PM

To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCI is no longer concerned about the fate of the smaller, non-exceptional trees.
- Protect red alders, black cottonwoods, and bitter cherries. These native trees provide important resources to birds and other wildlife and contribute to our sense of place in Seattle. Following the "right tree, right place" philosophy, these native trees can safely thrive and should be protected like other species.
- Expand the definition of tree groves to stands of six or more trees at least six inches in diameter, including street trees. Tree groves provide important habitat for birds and are becoming less common outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove.
- Require public notice postings on development site and online for removal of Exceptional trees, even when hazardous, to ensure community members know when and where legal tree removal is occurring.
- Require replacement for trees removed from groves and removed hazard trees.
- Align SDCI's proposed Tree Care Provider Acknowledgement with SDOT's Tree Service Provider Registration. Do not automatically renew this form annually. It should be updated each year. Reduce the number of infractions tree service providers can incur in a year before they are removed from the City's list to do business from more than three infractions to more than two infractions.
- Section 4: Preference for planting off-site replacement trees on public property is restrictive. The Director should be able to allow replacement trees not only on public property, but also on private property, where desired by the property owner, in order to meet the City's goals and objectives of race and social justice under Seattle's Equity and Environment Initiative.

The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
Tanea Stephens  
2916 11th Ave W Seattle, WA 98119-1802  
taneastephens@outlook.com

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From: pfeffer828@everyactioncustom.com <pfeffer828@everyactioncustom.com>  
Sent: Tuesday, August 11, 2020 12:56 PM  
To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, and an avowed treehugger, protecting Seattle's urban forest is of utmost important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

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The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Trees are crucial for climate control and stabilization and Seattle's trees are becoming all the more important as trees outside the city continue to be removed for suburban construction.

Sincerely,  
Mark Blitzer  
8047 Earl Ave NW Seattle, WA 98117-4529 pfeffer828@comcast.net

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From: sydneybjones@everyactioncustom.com <sydneybjones@everyactioncustom.com>  
Sent: Tuesday, August 11, 2020 12:56 PM  
To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

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Sincerely,  
Sydney G

3034 B 31st Ave W Seattle, WA 98199-2725 sydneybjones@gmail.com

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From: lucinda@everyactioncustom.com <lucinda@everyactioncustom.com>

Sent: Tuesday, August 11, 2020 1:10 PM

To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

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Sincerely,  
 Lucinda O'Halloran  
 1523 A 30th Ave S # SO Seattle, WA 98144-3905 lucinda@blarg.net

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**From:** John <john.nuler@gmail.com>  
**Sent:** Tuesday, August 11, 2020 12:15 PM  
**To:** Herbold, Lisa <Lisa.Herbold@seattle.gov>; Strauss, Dan <Dan.Strauss@seattle.gov>; Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Re: Parks Dept. Tree Care

**CAUTION: External Email**

Please view and post complaints which likely go nowhere, with no action being taken. This is similar to Parks Dept permitting illegal by code tree removal and reduction on Parks Properties for residential views. This has been banned for decades, yet continues secretly to this day.

## Record Number: 006791-20CP

Code Compliance Complaint

**Record Status:** [Under Investigation](#)

- Record Info :
  - [Record Details](#)
  - [Status](#)
  - [Related Records](#)
  - [Attachments](#)
  - [Inspections & AppointmentsNotes](#)
- Payments :
  - [Fees](#)

## Work Location

7137 38th AVE SW

## Record Details

### Project Description:

CONSTRUCTION - PHOTOS IN DOCUMENTS

### Application Information

#### complaint information

What is your complaint?:

Building destruction encroaching into ECA Steep Slope fenced off construction fence. Debris covering base of protection north. Crew is using access from south destroy park vegetation not included in permit. No dust mitigation, sprinklers seen former home. Work ongoing Friday afternoon called DCI inspections and left message for Inspector Joe Eckoff

Location On Site:

7137 38th Ave Sw

Do you want your contact information to remain confidential?:

No

Would you like to know the results of the inspection?:

Yes

### Parcel Information

Development Site Parcel:

DV1159575

Legal Description:

SOUTH 35.73 FT OF LOT 15, BLOCK 1, LINCOLN BEACH VILLAS ADDNI



**From:** heidi calyxsite.com <heidi@calyxsite.com>

**Sent:** Tuesday, August 11, 2020 7:23 PM

**To:** Strauss, Dan <Dan.Strauss@seattle.gov>; Mosqueda, Teresa <Teresa.Mosqueda@seattle.gov>; Juarez, Debora <Debora.Juarez@seattle.gov>; Pedersen, Alex <Alex.Pedersen@seattle.gov>; Lewis, Andrew <Andrew.Lewis@seattle.gov>; Gonzalez, Lorena <Lorena.Gonzalez@seattle.gov>

**Cc:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Comments on CB 119835

**CAUTION: External Email**

Dear Land Use Committee:

Attached please find my comments on the current Omnibus Bill, CB 119835. You still have loopholes you need to close.

All the best,  
Heidi Siegelbaum

Dear Land Use Subcommittee:

You must strike the added land-use code language (inserted by whom? Developers at your door?) on pages 4 and 8 of the Omnibus Bill you will consider tomorrow.

Your provisions will allow single-family properties to be divided and sold like multi-family unit lots. We already have tons of property that is vacant because it's too expensive and there is no evidence that what would be subdivided and sold would be affordable, thereby obviating specious statements that this is about affordable housing. There is also no legal mechanism or other provision which would make the additional developments affordable.

It's unclear whether ***you really intend*** to create an absent speculative investment fiesta leading to higher housing costs, degraded neighborhoods (because either no one lives on the site or there are multiple owners who have no neighborhood commitments), loss of large trees (although we are already destroying our natural capital) and more water pollution (from adding more impervious surfaces to the City), increasing city temperatures, asthma rates and generally making the city unlivable and ugly.

An oversight? Responding to yet more developer pressure? Not sure how to address affordable housing with innovative ideas?

Please read Visualizing Compatible Density;

<http://mrsc.org/Home/Stay-Informed/MRSC-Insight/April-2017/Visualizing-Compatible-Density.aspx>

We have more than enough room to entertain intact neighborhoods that group similar housing types without the discordant, vomiting domino effect of mis-matched housing enabled by loopholes and crafty legal reasoning.

**Unintended consequences of keeping the provisions on pages 4 and 8 include the following:**

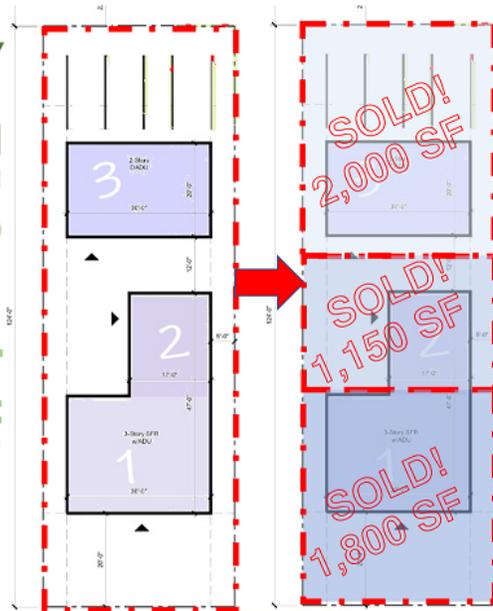
- 1) Investors buy existing single-family property; tear down all; build connected house with two attached accessory dwellings; and then sell each individually to separate buyers.**
- 2) Property owner sells a portion or two of a single-family lot for parking or open space as a "Unit Lot", later the new owner(s) adds a DADU and/or ADU**

The August 7 report now states, without striking anything from the Omnibus, the following: *"Unit lots are created through a subdivision process, which is typically used for townhouse, rowhouse, and other lowrise multifamily development. Unit lots are created through the subdivision of a parent lot. Development standards are applied to the parent lot from which unit lots are created. This allows unit lots to be non-conforming to some development standards. The unit lot subdivision process allows for fee simple sale of individual unit lots. The Code currently*

prohibits development of detached accessory dwelling units on unit lots.<sup>1</sup> However, the proposed omnibus language introduces ambiguity into the Code that could lead to unintended consequences for future development of vacant lots that are created through a unit lot subdivision process.

**Currently  
1 lot w/ 1  
home and  
2 ADU  
Aug 2019**

**4,960 SF  
'Parent  
Lot'**



**Proposed  
2-3 unit lots  
w/ Omnibus  
Aug 2020**

**Strike the  
Proposed  
Omnibus  
Converting  
Accessory  
Dwellings in  
SF-Zones to  
Separately  
Sold Unit Lots**

Do the right thing.

Sincerely,  
Heidi Siegelbaum  
Seattle, WA.

---

From: kathy@everyactioncustom.com <kathy@everyactioncustom.com>  
Sent: Wednesday, August 12, 2020 7:50 AM  
To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

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The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
kathy holzer

17576 Ballinger Way NE Lake Forest Park, WA 98155-5516 [kathy@outonalimbseattle.com](mailto:kathy@outonalimbseattle.com)

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From: [gard\\_rein@everyactioncustom.com](mailto:gard_rein@everyactioncustom.com) <[gard\\_rein@everyactioncustom.com](mailto:gard_rein@everyactioncustom.com)>

Sent: Wednesday, August 12, 2020 10:31 AM

To: Pinto de Bader, Sandra <[Sandra.Pinto\\_de\\_Bader@Seattle.gov](mailto:Sandra.Pinto_de_Bader@Seattle.gov)>

Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. With a PhD in Biology, I know that people need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule needs to be strengthened in the following ways:

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The most important thing we can do for Seattle's urban forest is to protect the trees we already have. For the health of our city, I urge you to strengthen and implement this Director's Rule now and continue

working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,

Reingard Rieger

8804 Ashworth Ave N Seattle, WA 98103-4023 gard\_rein@hotmail.com

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From: mklem@everyactioncustom.com <mklem@everyactioncustom.com>

Sent: Wednesday, August 12, 2020 12:29 PM

To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

Subject: Please protect our urban forests - Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a resident of Seattle, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

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Sincerely,  
Maya Klem

6504 4th Ave NE Apt 2 Seattle, WA 98115-6494 [mklem@forterra.org](mailto:mklem@forterra.org)

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From: [nklioutc@everyactioncustom.com](mailto:nklioutc@everyactioncustom.com) <[nklioutc@everyactioncustom.com](mailto:nklioutc@everyactioncustom.com)>

Sent: Wednesday, August 12, 2020 4:47 PM

To: Pinto de Bader, Sandra <[Sandra.Pinto\\_de\\_Bader@Seattle.gov](mailto:Sandra.Pinto_de_Bader@Seattle.gov)>

Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

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The proposed rule can be strengthened in the following ways:

- No existing tree of any size, unless contagiously sick, should ever be removed for a development project, trees and their inhabitants were there first!
- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees, all trees, all sizes. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCI is no longer concerned about the fate of the smaller, non-exceptional trees.
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No, if you take a tree off residential spot you owe it back there, no to 'somewhere' public'.

- Section 4: Preference for planting off-site replacement trees on public property is restrictive. The Director should be able to allow replacement trees not only on public property, but also on private property, where desired by the property owner, in order to meet the City's goals and objectives of race and social justice under Seattle's Equity and Environment Initiative.

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Sincerely,  
 Natalia Klioutcheva  
 1919 Queen Anne Ave N Seattle, WA 98109-2562 nklioutc@gmail.com

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**From:** Vicki Pardee <vpardee@aol.com>  
**Sent:** Wednesday, August 12, 2020 5:21 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Re: Proposed Director's Rule 13-2020 Relating to Tree Protection

**CAUTION: External Email**

Thank you !

I am finding that none of the departments in the city communicate with each other.

I have met with James LBlanc, city arborist. Wonderful and knowledgeable. He referred me to a list of city approved tree service companies. I was told I was personally responsible for tree maintenance in unimproved street right of way.

I have an estimate from a city approved tree service (Conservation Trees) for \$3700.00 to remove debris from uphill neighbors and remove a few branches, and a center Trunk from an aging alder.

Today, Mr. Eckoff Had been sent out by Valerie...(?) from SDCI. Mr. Eckoff came out to document a 60' tree That fell from the property up hill from me. It was a maple, left with ivy covering it. It just cracked

and fell downhill towards my property, no wind or cutting involved. It fell onto the unimproved street right of way.

I have also met with Todd Meadows from SDCI.

I am lead to believe it is my responsibility to protect my property from uphill activity and maintain trees on the easement that separates the properties on 50th Ave SW and Gordon Place SW from mine at 6330 Atlas Place SW.

Mr. Eckoff expressed his opinion that the Adler is a hazard and should be removed by SDOT. It looks like SDOT is the only department who has not been here to inspect the vegetation removal and topping I have been reporting for the last 15 years.

My concern is erosion and drainage. This deforestation cannot be done without slope protection for the entire hillside geography and downhill property owners.

Of course, all this is part of URBAN FORESTRY. I have been moving blackberries and ivy for 15 years, planting native vegetation and conifers. Only to have them crushed by debris from branches cut and left to lay from the trees up hill. Now there is 5ft of debris that makes it impossible to do any restoration.

The plans outlined in your talk today- all hinged on PERMITTED tree removal. My guess is less than 50% of tree cutting and vegetation Removal is permitted. Making it impossible to track, measure or make any accurate restoration possible.

Seattle's geography is unique, spectacular and very Fragile.

The city continues to allow building permits but makes no effort to manage land it now owns as a easement or right of ways or green belts. This is proving to be a major problem as what happens upHill, ultimately ends up in Puget Sound.

I am not trying to be a trouble maker. I have spent countless hours hauling debris off my hillside, and hauling compost , bales of straw and root balls of trees up hill to stabilize my hillside and Gordon Place SW above me.

I would appreciate guidance - from the City. I have received a different opinion and message from each and every department. Which leads me to believe I am on my own to figure this out.

Sincerely,

Vicki Pardee

[vpardee@aol.com](mailto:vpardee@aol.com)

206/769-5556

On Aug 12, 2020, at 4:29 PM, Pinto de Bader, Sandra <[Sandra.Pinto de Bader@seattle.gov](mailto:Sandra.Pinto_de_Bader@seattle.gov)> wrote:

You are most welcome, Vicki.

I encourage you to continue to either attend meetings or listen to the UFC meeting notes (published at [www.seattle.gov/Urbanforestrycommission](http://www.seattle.gov/Urbanforestrycommission) under meeting documents). I also

encourage you to provide comment during public comment opportunities or send emails with your input.

Thank you,

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**From:** Vicki Pardee <[vpardee@aol.com](mailto:vpardee@aol.com)>  
**Sent:** Wednesday, August 12, 2020 4:06:47 PM  
**To:** Pinto de Bader, Sandra <[Sandra.Pinto\\_de\\_Bader@Seattle.gov](mailto:Sandra.Pinto_de_Bader@Seattle.gov)>  
**Subject:** Re: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Thank you for allowing me to join the Urban Forestry commissions meeting today. I had to exit at 4:15. I would very much like to stay involved and change how Seattle manages its urban forests and how property owners manage trees on their property.

Vicki Pardee  
[vpardee@aol.com](mailto:vpardee@aol.com)  
206/769-5556

> On Aug 10, 2020, at 9:57 AM, Pinto de Bader, Sandra <[Sandra.Pinto\\_de\\_Bader@seattle.gov](mailto:Sandra.Pinto_de_Bader@seattle.gov)> wrote:  
>  
> Hi Vicki,  
>  
> Please note that this effort is being led by the Seattle Department of Construction and Inspections (SDCI). Please see: <https://www.seattle.gov/sdci/codes/changes-to-code/tree-protection>. You can provide your input directly to SDCI on this Director's Rule.  
>  
> The Urban Forestry Commission (UFC) advises Mayor and Council on issues related to Seattle's urban forest. You can provide public comment at one of the commission meetings and can sign up to receive information on agendas and meetings by subscribing to the UFC's mailing list here: <https://www.seattle.gov/urbanforestrycommission>  
>  
> Thank you,  
>  
> Sandra Pinto de Bader  
> She/her/hers  
> Urban Forestry Commission Coordinator  
> City of Seattle, Office of Sustainability & Environment  
> 206.684.3194 | [Sandra.Pinto\\_de\\_Bader@seattle.gov](mailto:Sandra.Pinto_de_Bader@seattle.gov)  
> Facebook | Twitter | Blog  
>  
>  
> FAQs | BLOG  
>  
> -----Original Message-----  
> From: Vicki Pardee <[vpardee@aol.com](mailto:vpardee@aol.com)>

> Sent: Monday, August 10, 2020 9:52 AM  
> To: Pinto de Bader, Sandra <[Sandra.Pinto\\_de\\_Bader@Seattle.gov](mailto:Sandra.Pinto_de_Bader@Seattle.gov)>  
> Subject: Re: Proposed Director's Rule 13-2020 Relating to Tree Protection  
>  
> CAUTION: External Email  
>  
> How can I be present on these meetings.  
> How can I work to make changes in code and restoration requirements?  
> How can departments work together to manage city owned land, zoning and how negligence is undermining the safety of our geography.  
>  
> Vicki Pardee  
> [vpardee@aol.com](mailto:vpardee@aol.com)  
> 206/769-5556

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From: shannonnicholgodbout@everyactioncustom.com  
<[shannonnicholgodbout@everyactioncustom.com](mailto:shannonnicholgodbout@everyactioncustom.com)>  
Sent: Wednesday, August 12, 2020 5:53 PM  
To: Pinto de Bader, Sandra <[Sandra.Pinto\\_de\\_Bader@Seattle.gov](mailto:Sandra.Pinto_de_Bader@Seattle.gov)>  
Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

In the midst of a global mass extinction — including crashing songbird and insect populations and the conspicuous starvation of our resident Orcas — our city must address several locally contributing factors, including the rapid loss of Seattle's "common" native trees, including Douglas Fir, Red Alder, Big Leaf Maple, and Western Red Cedar. Our native trees are essential to the reproduction of co-evolved native insects which are the basis of our local terrestrial and marine food web. Many of our native tree species have exclusive relationships with dozens of insect species dependent upon them to reproduce and, in turn, to supply food to our more visible birds and animals in alarming decline.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

- Protect ecologically crucial red alders, black cottonwoods, and bitter cherries. These native trees are at the core of native insect reproduction — dozens of essential species (which are in alarming decline) cannot simply reproduce without these trees as ovipositor hosts. These native insects are at the core of food needs for declining native birds and other wildlife and contribute to our sense of place in Seattle.

As an experienced landscape architect with 25 years under my belt, I can attest that Seattle has reacted in a most peculiar way to the "right tree, right place" philosophy, eschewing its glorious and essential native trees for sterile and exotic replacements that neither offer the shade and water treating functions of the native species they replace nor support the local food web. No other region in which we work

carries such a current predominance of Colonizing mindset toward the elimination and replacement of its native landscape and species with imported and imposed values and aesthetics brought from elsewhere. There is no rational, horticultural, or arboricultural logic for this bias against native tree species in Seattle. It is simply the culture of an immature "settler" city with a colonizing "garden" mindset toward its indigenous landscape and tree species. We can not afford to indulge this mindset any longer and watch our region suffer a local as well as global mass extinction due to gardening tropes and industrial nursery lobbyists.

- The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
Shannon Nichol  
1606 1st Ave N Seattle, WA 98109-2801  
shannonnicholgodbout@gmail.com

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From: whitney.n.k@everyactioncustom.com <whitney.n.k@everyactioncustom.com>  
Sent: Wednesday, August 12, 2020 6:28 PM  
To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential shade and natural beauty to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCl is no longer concerned about the fate of the smaller, non-exceptional trees.
- Protect red alders, black cottonwoods, and bitter cherries. These native trees provide important resources to birds and other wildlife and contribute to our sense of place in Seattle. Following the "right tree, right place" philosophy, these native trees can safely thrive and should be protected like other species.
- Expand the definition of tree groves to stands of six or more trees at least six inches in diameter, including street trees. Tree groves provide important habitat for birds and are becoming less common

outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove.

- Require public notice postings on development sites and online for removal of Exceptional trees, even when hazardous, to ensure community members know when and where legal tree removal is occurring.
- Require replacement for trees removed from groves and removed hazard trees.
- Align SDCI's proposed Tree Care Provider Acknowledgement with SDOT's Tree Service Provider Registration. Do not automatically renew this form annually. It should be updated each year. Reduce the number of infractions tree service providers can incur in a year before they are removed from the City's list to do business from more than three infractions to more than two infractions.
- Section 4: Preference for planting off-site replacement trees on public property is restrictive. The Director should be able to allow replacement trees not only on public property, but also on private property, where desired by the property owner, in order to meet the City's goals and objectives of race and social justice under Seattle's Equity and Environment Initiative.

The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
Whitney Neufeld-Kaiser  
6540 31st Ave NE Seattle, WA 98115-7243 whitney.n.k@gmail.com

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From: jlgunden@everyactioncustom.com <jlgunden@everyactioncustom.com>  
Sent: Wednesday, August 12, 2020 6:33 PM  
To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

Protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees

greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCI is no longer concerned about the fate of the smaller, non-exceptional trees.

- Protect red alders, black cottonwoods, and bitter cherries. These native trees provide important resources to birds and other wildlife and contribute to our sense of place in Seattle. Following the "right tree, right place" philosophy, these native trees can safely thrive and should be protected like other species.
- Expand the definition of tree groves to stands of six or more trees at least six inches in diameter, including street trees. Tree groves provide important habitat for birds and are becoming less common outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove.
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The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
Jacob Gunden  
6322 Latona Ave NE Seattle, WA 98115-6555 [jlgunden@gmail.com](mailto:jlgunden@gmail.com)

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From: [abaileycrandall@everyactioncustom.com](mailto:abaileycrandall@everyactioncustom.com) <[abaileycrandall@everyactioncustom.com](mailto:abaileycrandall@everyactioncustom.com)>

Sent: Wednesday, August 12, 2020 7:32 PM

To: Pinto de Bader, Sandra <[Sandra.Pinto\\_de\\_Bader@Seattle.gov](mailto:Sandra.Pinto_de_Bader@Seattle.gov)>

Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

You know what makes Seattle beautiful? Trees! Cities are only made more lives liveable, cooler, and prettier with our urban forest. We NEED trees. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCI is no longer concerned about the fate of the smaller, non-exceptional trees.
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The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,

Amanda Bailey Crandall

13430 Meridian Ave N Seattle, WA 98133-7839 [abaileycrandall@gmail.com](mailto:abaileycrandall@gmail.com)

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From: [kaylee34@everyactioncustom.com](mailto:kaylee34@everyactioncustom.com) <[kaylee34@everyactioncustom.com](mailto:kaylee34@everyactioncustom.com)>

Sent: Wednesday, August 12, 2020 7:43 PM

To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
Subject: Please protect trees! Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

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The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
Kaylee Andrews  
2832 14th Ave W Seattle, WA 98119-2048  
kaylee34@gmail.com

---

From: jumpforjoy2day@everyactioncustom.com <jumpforjoy2day@everyactioncustom.com>  
Sent: Wednesday, August 12, 2020 8:09 PM  
To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
Subject: Audubon Knows the Needs and I Support Their Proposal - Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

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The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
 Stephanie Roche  
 6405 Phinney Ave N Apt L Seattle, WA 98103-5573 jumpforjoy2day@hotmail.com

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From: ajopus@everyactioncustom.com <ajopus@everyactioncustom.com>  
 Sent: Wednesday, August 12, 2020 8:16 PM  
 To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
 Subject: Tree Protection per Proposed Director's Rule 13-2020

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

Protecting Seattle's urban forest is important to me. Trees are vital to the people who live in this city, as well as over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

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Sincerely,  
Amanda Opuszynski  
1720 NW 64th St Seattle, WA 98107-2345  
ajopus@gmail.com

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From: megann.karch@everyactioncustom.com <megann.karch@everyactioncustom.com>  
Sent: Wednesday, August 12, 2020 8:44 PM  
To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
Subject: Protect Seattle Trees

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a tree lover and supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Exposure to nature is important for health as it helps to reduce stress, positively contributing to social determinants of health. Our low income and less mobile community members rely on Seattle city trees for that access to health promoting nature.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

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Sincerely,  
Megann Karch  
211 22nd Ave Seattle, WA 98122-6008  
megann.karch@gmail.com

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From: samskeller@everyactioncustom.com <samskeller@everyactioncustom.com>  
Sent: Wednesday, August 12, 2020 8:59 PM  
To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCI is no longer concerned about the fate of the smaller, non-exceptional trees.
- Protect red alders, black cottonwoods, and bitter cherries. These native trees provide important resources to birds and other wildlife and contribute to our sense of place in Seattle. Following the "right tree, right place" philosophy, these native trees can safely thrive and should be protected like other species.
- Expand the definition of tree groves to stands of six or more trees at least six inches in diameter, including street trees. Tree groves provide important habitat for birds and are becoming less common outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove.
- Require public notice postings on development site and online for removal of Exceptional trees, even when hazardous, to ensure community members know when and where legal tree removal is occurring.
- Require replacement for trees removed from groves and removed hazard trees.
- Align SDCI's proposed Tree Care Provider Acknowledgement with SDOT's Tree Service Provider Registration. Do not automatically renew this form annually. It should be updated each year. Reduce the number of infractions tree service providers can incur in a year before they are removed from the City's list to do business from more than three infractions to more than two infractions.
- Section 4: Preference for planting off-site replacement trees on public property is restrictive. The Director should be able to allow replacement trees not only on public property, but also on private property, where desired by the property owner, in order to meet the City's goals and objectives of race and social justice under Seattle's Equity and Environment Initiative.

The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
Sam Keller  
3636 Phinney Ave N Seattle, WA 98103-8533 samskeller@gmail.com

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From: alexandrabronwyn@everyactioncustom.com <alexandrabronwyn@everyactioncustom.com>  
Sent: Wednesday, August 12, 2020 9:23 PM  
To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
Subject: Please protect our trees to help save Seattle's birds

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

Hello,

I'm writing to you about an issue that means a lot to me in hopes that you can help protect my favorite part of living in Seattle.

As a passionate bird watcher and member of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local vibrant bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

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The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Thank you for your leadership on this issue.

Sincerely,  
 Alex Pearson  
 5515 28th Ave NE Seattle, WA 98105-5515 alexandrabronwyn@gmail.com

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From: kellydeckergreenwood@everyactioncustom.com  
 <kellydeckergreenwood@everyactioncustom.com>  
 Sent: Thursday, August 13, 2020 10:43 AM  
 To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
 Subject: Relating to Tree Protection and Habitat Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

I would love to see more fruit trees that would provide a public food source. This would be particularly appreciated near low income housing and community gardens.

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCI is no longer concerned about the fate of the smaller, non-exceptional trees.
- Protect red alders, black cottonwoods, and bitter cherries. These native trees provide important resources to birds and other wildlife and contribute to our sense of place in Seattle. Following the "right

tree, right place" philosophy, these native trees can safely thrive and should be protected like other species.

- Expand the definition of tree groves to stands of six or more trees at least six inches in diameter, including street trees. Tree groves provide important habitat for birds and are becoming less common outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove.
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The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,

Kelly Greenwood

5640 35th Ave SW Seattle, WA 98126-2824 [kellydeckergreenwood@gmail.com](mailto:kellydeckergreenwood@gmail.com)

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**From:** heidi calyxsite.com <[heidi@calyxsite.com](mailto:heidi@calyxsite.com)>

**Sent:** Thursday, August 13, 2020 12:06 PM

**To:** Pinto de Bader, Sandra <[Sandra.Pinto\\_de\\_Bader@Seattle.gov](mailto:Sandra.Pinto_de_Bader@Seattle.gov)>; Torgelson, Nathan <[Nathan.Torgelson@seattle.gov](mailto:Nathan.Torgelson@seattle.gov)>; David Moehring <[dmoehring@consultant.com](mailto:dmoehring@consultant.com)>

**Subject:** New tool for Critical Areas from the Dept of Commerce

**CAUTION: External Email**

Hi there

The attached proof of concept model for critical areas may be of interest to you. It comes from the Department of Commerce and has contact information on it.

All the best,

Heidi

[Heidi@calyxsite.com](mailto:Heidi@calyxsite.com)

(206) 784-4265

<https://www.linkedin.com/in/HeidiSiegelbaum>

# PUGET SOUND National Estuary Program

## INTEGRATED CRITICAL AREAS WEB TOOL (PROOF OF CONCEPT)

All jurisdictions are required to protect critical environmental areas under the GMA. Many tools exist to help local governments with this task, but they have not been integrated to provide maximum value and usability for planners.

### What we're doing

We are exploring the feasibility of developing a plug and play interactive web mapping interface that links mapping and modeling tools from many jurisdictions and agencies to help planners protect critical areas and assess the impacts of land use decisions at regional and local scales.

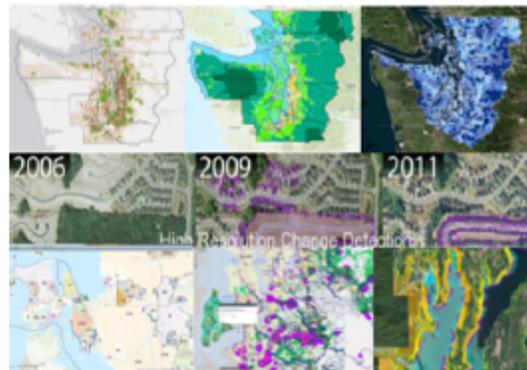
### How we're doing it

- Engaging local planners, agencies and organizations to understand needs, challenges and ideas
- Researching tools and elements to be integrated
- Writing & presenting a Prospectus



### WHY IS THIS ISSUE IMPORTANT

Protecting critical areas is essential to preserving our natural environment and protecting public health and safety. Integrating decision-support tools will help planners make better land use and critical areas decisions, improve monitoring, and assess progress on regional targets.



### WHAT YOU CAN DO

We want to hear from you! The first phase of this project is all about collaboration and getting input from stakeholders and other interested parties. If you have a need for this type of integrated interface, or if you have an idea about data, tools, models, or other functionality that should be included, we want to know about it. We will be seeking input via surveys, interviews, and advisory meetings.

### ABOUT COMMERCE'S GROWTH MANAGEMENT SERVICES

Growth Management Services assists and guides local governments, state agencies, and others to manage growth and development consistent with the GMA. We provide direct assistance, grants, training and education, guidebooks, review of proposed actions, and state coordination.

### FOR MORE INFORMATION

Tara Newman, Growth Management  
Washington Department of Commerce  
Tara.newman@commerce.wa.gov  
(360) 764-3414



From: srwatkin@everyactioncustom.com <srwatkin@everyactioncustom.com>  
Sent: Thursday, August 13, 2020 12:15 PM

To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
Subject: We'd Love Your Continued Support: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

(I have personally witnessed the tearing down of a lot of trees in our North Queen Anne neighborhood to make way for new housing and apartments. Every time they rake through the vegetation of our city I cringe. Our trees and landscape vegetation are so vital for Seattle's clean air; not to mention the raccoons, squirrels, birds and many other fauna that rely on such spaces to maintain their habitat. Our wildlife and our plants keep our city so wonderful and full of natural life. Please, please, PLEASE continue to enforce stronger policies that protect our beautiful trees and green-belts. With utmost respect, your consideration and support is everything.)

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

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The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Thank you!

Sincerely,  
 Sarah Watkins  
 618 W Emerson St Apt D Seattle, WA 98119-1569 srwatkin@gmail.com

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From: arabella.pearson@everyactioncustom.com <arabella.pearson@everyactioncustom.com>  
 Sent: Wednesday, August 12, 2020 9:27 PM  
 To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
 Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

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The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
 Arabella Pearson  
 7126 55th Ave S Seattle, WA 98118-4206  
 arabella.pearson@gmail.com

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From: clairecaiello@everyactioncustom.com <clairecaiello@everyactioncustom.com>  
 Sent: Wednesday, August 12, 2020 11:24 PM  
 To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
 Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

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Sincerely,  
 Claire Aiello  
 1119 NW 64th St Seattle, WA 98107-2253  
 clairecaiello@gmail.com

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From: cgerz66@everyactioncustom.com <cgerz66@everyactioncustom.com>  
 Sent: Wednesday, August 12, 2020 11:43 PM  
 To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
 Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

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The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
Charlotte Gerzanics  
4322 7th Ave NE Seattle, WA 98105-6052

cgerz66@gmail.com

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From: sasham4@everyactioncustom.com <sasham4@everyactioncustom.com>

Sent: Wednesday, August 12, 2020 11:55 PM

To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

Subject: We can make Director's Rule 13-2020 more comprehensive

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a young city resident, protecting Seattle's urban forest is very important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

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Sincerely,  
Sasha Mayer  
1906 NE 45th St Seattle, WA 98105-3303  
sasham4@uw.edu

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From: mimitabby@everyactioncustom.com <mimitabby@everyactioncustom.com>  
Sent: Thursday, August 13, 2020 5:56 AM  
To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city. more than ever we need our trees! Especially big ones, which may save the planet.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

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Sincerely,  
 Mimi Boothby  
 8018 36th Ave S Seattle, WA 98118-4305  
 mimitabby@gmail.com

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From: lamabowers@everyactioncustom.com <lamabowers@everyactioncustom.com>  
 Sent: Thursday, August 13, 2020 9:03 AM  
 To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
 Subject: Protect Seattle's Urban Forests: Keep the Emerald City Emerald Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCI is no longer concerned about the fate of the smaller, non-exceptional trees.

- Protect red alders, black cottonwoods, and bitter cherries. These native trees provide important resources to birds and other wildlife and contribute to our sense of place in Seattle. Following the "right tree, right place" philosophy, these native trees can safely thrive and should be protected like other species.
- Expand the definition of tree groves to stands of six or more trees at least six inches in diameter, including street trees. Tree groves provide important habitat for birds and are becoming less common outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove.
- Require public notice postings on development site and online for removal of Exceptional trees, even when hazardous, to ensure community members know when and where legal tree removal is occurring.
- Require replacement for trees removed from groves and removed hazard trees.
- Align SDCI's proposed Tree Care Provider Acknowledgement with SDOT's Tree Service Provider Registration. Do not automatically renew this form annually. It should be updated each year. Reduce the number of infractions tree service providers can incur in a year before they are removed from the City's list to do business from more than three infractions to more than two infractions.
- Section 4: Preference for planting off-site replacement trees on public property is restrictive. The Director should be able to allow replacement trees not only on public property, but also on private property, where desired by the property owner, in order to meet the City's goals and objectives of race and social justice under Seattle's Equity and Environment Initiative.

The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
 Laura Bowers  
 3017 SW Hinds St Seattle, WA 98126-2327 lamabowers@gmail.com

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From: kellybrenner@everyactioncustom.com <kellybrenner@everyactioncustom.com>  
 Sent: Thursday, August 13, 2020 9:18 AM  
 To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
 Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

I've personally watched THREE neighbors in my single block over this summer cut down valuable mature trees. I wrote a book about Seattle's urban nature and I am disgusted by how little Seattle values trees. We KNOW how important trees are for wildlife, flood control, the urban heat island effect and climate change, not to mention livability and mental health. There is absolutely no reason to cut down a healthy, mature tree in the city and it should be a crime to cut them down because they are mess or an inconvenience.

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

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Sincerely,

Kelly Brenner  
8426 54th Ave S Seattle, WA 98118-4705  
kellybrenner@gmail.com

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From: valeriebentivegna@everyactioncustom.com <valeriebentivegna@everyactioncustom.com>  
Sent: Thursday, August 13, 2020 10:35 AM  
To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

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Sincerely,  
Valerie Bentivegna  
2216 NE 46th St Seattle, WA 98105-5773  
valeriebentivegna@gmail.com

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From: bardjess@everyactioncustom.com <bardjess@everyactioncustom.com>  
Sent: Thursday, August 13, 2020 1:18 PM  
To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

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Sincerely,  
 Jessica Dixon  
 328 N 71st St Seattle, WA 98103-5020  
 bardjess@msn.com

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From: clairewalker206@everyactioncustom.com <clairewalker206@everyactioncustom.com>  
 Sent: Thursday, August 13, 2020 3:37 PM  
 To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
 Subject: Protect Seattle's Remaining Trees

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

I was born and raised in Seattle and over the last 38 years I have seen the city's urban canopy dwindle. The Emerald City I once knew is now replacing trees with condos at an alarming rate. My hope is that we are mindful about how we go about this and try every effort to preserve & protect whenever possible. Even if it means before profit.

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

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Sincerely,

Claire Turner

16843 Fremont Ave N Shoreline, WA 98133-5243 [clairewalker206@gmail.com](mailto:clairewalker206@gmail.com)

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From: myluv2206@everyactioncustom.com <myluv2206@everyactioncustom.com>

Sent: Thursday, August 13, 2020 3:39 PM

To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

Subject: SAVE OUR TREES. Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

One of the best things I always tell people is how proud of Seattle I am for all the greenery. When I moved to the city from an hour south I thought I would hate it because it would be a concrete jungle. Now as years have passed and I have been living in Seattle over 15 yrs. My city I grew up in has cut down all the trees and Seattle has not! Please do not become like other places. We need trees for shade especially now with climate change! To reduce heat. To clean our air. There are studies to show that green can reduce migraines and depression. To balance our wildlife and give them homes. It is a circle of life and we are all connected. This is a vacation spot and people love to go on vacation looking for natural beauty. Protect what nature gave us.

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

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The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,

Athena Bautista

5954 Beach Dr SW Seattle, WA 98136-1348 [myluv2206@gmail.com](mailto:myluv2206@gmail.com)

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From: candacemenelson@everyactioncustom.com <candacemenelson@everyactioncustom.com>

Sent: Thursday, August 13, 2020 4:11 PM

To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

Trees are so important. I don't need to tell you that. I care deeply about the climate and beg you to protect our trees and wetlands for future generations.

And now the letter you've gotten dozens of times already:

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

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Sincerely,

Candace Nelson

3671 Dayton Ave N Seattle, WA 98103-9334 [candacemenelson@gmail.com](mailto:candacemenelson@gmail.com)

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From: emarnstein@everyactioncustom.com <emarnstein@everyactioncustom.com>

Sent: Thursday, August 13, 2020 4:18 PM

To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, resident of Capitol Hill, and a certified arborist, protecting Seattle's urban forest is important to me. Trees provide beauty, shade, stormwater retention, carbon sequestration and support for over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

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Sincerely,

Ellen Arnstein

532 Belmont Ave E Apt 101 Seattle, WA 98102-4851 [emarnstein@yahoo.com](mailto:emarnstein@yahoo.com)

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From: britdanhuj@everyactioncustom.com <britdanhuj@everyactioncustom.com>

Sent: Thursday, August 13, 2020 4:31 PM

To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

I've had trees in our Neighborhood illegally cut. A beautiful 36" & 30" diameter Douglas Fir cut by a wildcatter ( unlicensed ) tree removal companies in my neighborhood on Phinney Ridge for development of a house that SDCI had approved. Their diagram did not even include the two exceptional trees.

Recently, the SDOT approved removal of two cedar trees from street parking in my neighborhood. One of them, Did need to be removed, however, the other one was healthy and its diameter was 13 feet. It was not rotten. It was a convenience for the contractor.

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

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Sincerely,  
Cynthia Johnson

5105 1st Ave NW Seattle, WA 98107-3433

[britdanhuj@aol.com](mailto:britdanhuj@aol.com)

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From: 2020suejackson@everyactioncustom.com <2020suejackson@everyactioncustom.com>

Sent: Thursday, August 13, 2020 5:26 PM

To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

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property, where desired by the property owner, in order to meet the City's goals and objectives of race and social justice under Seattle's Equity and Environment Initiative.

The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,

Sue Jackson

1800 S Jackson St Seattle, WA 98144-2177 2020suejackson@gmail.com

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From: rhhudson@everyactioncustom.com <rhhudson@everyactioncustom.com>

Sent: Thursday, August 13, 2020 5:44 PM

To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

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Sincerely,  
 Rick H Hudson  
 2727 NE 94th St Seattle, WA 98115-3476  
 rhhudson@uw.edu

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From: para\_penguin@everyactioncustom.com <para\_penguin@everyactioncustom.com>  
 Sent: Thursday, August 13, 2020 5:47 PM  
 To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
 Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

In addition to the boilerplate text provided by Seattle Audubon in the following paragraphs, I would like to provide my own thoughts here as well. I have lived in Seattle for 42 years. What makes Seattle special is not the city itself, but the place where the city exists. And that place is one of the most unique natural environments not only in our country, but in the world. The combination of deep, cold water in the Puget Sound, moderate temperatures, abundant rainfall, and the meteorological effect of our beautiful glaciated mountains provides the conditions for what are some of the healthiest forestland on the planet. I have been dismayed to see the toll that the hyper-development occurring in our city has had on our urban forests. I can point to examples in my own neighborhood where heritage trees have been cut down to maximize the footprint of new construction. I have read about the amount of canopy cover we have lost in Seattle. Where the moniker Emerald City used to refer to the green of our trees, it now seems to refer to the green of dollar bills in the pockets of developers and their ilk. This is not right, and is not fair to the planet or to those of us who love the city for what it was. If you are a serious believer in climate change, then you know that the destruction of our priceless urban trees is wrong.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

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Sincerely,

Mark Dale

8251 Northrop Pl SW Seattle, WA 98136-2243 para\_penguin@yahoo.com

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From: m@everyactioncustom.com <m@everyactioncustom.com>

Sent: Thursday, August 13, 2020 10:00 PM

To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

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The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
Matt Sweet  
745 Bellevue Ave E Seattle, WA 98102-4484 m@mattsw.com

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**From:** Annie Thoe <info@email.actionnetwork.org>

**Sent:** Thursday, August 13, 2020 10:13 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** We need much more protection for Trees

**CAUTION: External Email**

Sandra Pinto de Bader,

I've written numerous letters over the past year-- meanwhile in my neighborhood I've watched numerous large, healthy trees being cut because of lack of awareness and protection from the city. People need to be educated on the value of mature trees, of maintaining our canopy for future generations-- and without a stronger ordinance with requirements for both builders, developers, arborists and homeowners to maintain more canopy-- replace (which is pretty darn impossible with mature trees, but they need to do it somehow). The livability factor of this city and the impact to pollution, global warming, habitat for other non-human beings and illness is at stake.

Please- don't delay-- utilize the recommendation from the UFC now. Make our city green for the future.

Thank you for your service,

Annie Thoe

Annie Thoe

[anniethoe@gmail.com](mailto:anniethoe@gmail.com)

2201 NE 120th St

Seattle, Washington 98125

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From: [anniethoe@everyactioncustom.com](mailto:anniethoe@everyactioncustom.com) <[anniethoe@everyactioncustom.com](mailto:anniethoe@everyactioncustom.com)>

Sent: Thursday, August 13, 2020 10:17 PM

To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

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The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
Annie Thoe  
2201 NE 120th St Seattle, WA 98125-5254 [anniethoe@gmail.com](mailto:anniethoe@gmail.com)

From: mjungmia@everyactioncustom.com <mjungmia@everyactioncustom.com>  
Sent: Thursday, August 13, 2020 11:12 PM  
To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

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Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

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Sincerely,

Marie Braaksma

3225 W Government Way Seattle, WA 98199-1316 [mjungmia@gmail.com](mailto:mjungmia@gmail.com)

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From: [Imcginty206@everyactioncustom.com](mailto:Imcginty206@everyactioncustom.com) <[Imcginty206@everyactioncustom.com](mailto:Imcginty206@everyactioncustom.com)>

Sent: Friday, August 14, 2020 6:09 AM

To: Pinto de Bader, Sandra <[Sandra.Pinto\\_de\\_Bader@Seattle.gov](mailto:Sandra.Pinto_de_Bader@Seattle.gov)>

Subject: Protect our trees and strengthen Director's Rule 13-2020

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a volunteer forest steward, I'm committed to protect Seattle's urban forests. Trees provide essential services to people and support over 100 local bird species and other important wildlife. Seattle needs a healthy, growing, and equitably-distributed urban forest.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

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Sincerely,  
 Lisa McGinty  
 3848 47th Ave SW Seattle, WA 98116-3730 lmcginty206@gmail.com

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From: keeley.godbout@everyactioncustom.com <keeley.godbout@everyactioncustom.com>  
 Sent: Friday, August 14, 2020 7:41 AM  
 To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
 Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

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Sincerely,  
Karen Keeley  
415 W Fulton St Seattle, WA 98119-2354  
keeley.godbout@comcast.net

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From: emcord@everyactioncustom.com <emcord@everyactioncustom.com>  
Sent: Friday, August 14, 2020 7:51 AM  
To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

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Sincerely,  
Emily Cordova  
3032 NW 61st St Seattle, WA 98107-2559  
emcord@gmail.com

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From: cncat247@everyactioncustom.com <cncat247@everyactioncustom.com>  
Sent: Friday, August 14, 2020 9:27 AM  
To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

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If you haven't listened to the Growing Old podcast, check it out.

Sincerely,  
Catrina Cuevas  
7554 26th Ave NW Seattle, WA 98117-4423 [cncat247@yahoo.com](mailto:cncat247@yahoo.com)

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**From:** Bernice Maslan <bmaslan08@gmail.com>

**Sent:** Friday, August 14, 2020 9:36 AM

**To:** David Moehring <moehringconsultant@gmail.com>

**Cc:** PRC <PRC@seattle.gov>; SCI\_Microfilm <DPD\_Microfilm@seattle.gov>; DOT\_LA <DOT\_LA@seattle.gov>; Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>; Emery, Chanda <Chanda.Emery@Seattle.gov>

**Subject:** Re: [TREE LOSS] More of Seattle's urban forest clears as rowhouses rowhouse development rules are circumvented

**CAUTION: External Email**

Dear government officials,

David really summed this up nicely. Of what value are guidelines if they are not being followed and one arborist's opinion is not validated?

Trees have really made a difference to our city in this time of lockdowns and quarantines. Please help us have development and trees.

Sincerely,

Bernice Maslan  

*Zay gezunt! (Be well!)*

On Mon, Aug 10, 2020 at 10:25 PM David Moehring <[moehringconsultant@gmail.com](mailto:moehringconsultant@gmail.com)> wrote:  
These townhouses and rowhouses are likely already being built... but are there plans showing that all 8 trees already removed?

Also, thank you for allowing public comment. But how does one comment without seeing the ULS site plans and proposed site plan with outline of the buildings?

Please provide all of the site plans on SDCI EDMS website for the 6-unit development at **1119 NW 57TH ST** and **1119 NW 57TH ST** (recently upzoned last year to LR2(M1).)

Please also keep the neighbors informed of adjacent forthcoming tree clearings at 1123 NW 57TH ST, 1125 NW 57TH ST, and 1133 NW 57TH ST (all recently purchased by different development companies.

Please assure that **Seattle's tree protections** being enforced. What design departures were implemented, if any, within this LR2(M1) zone to retain large trees? The arborist report prepared for Alex Mason has no photos in the report but claims the Western Red Cedar was only 34" DBH...and a couple of multi-trunk lawson cypress are also indicated to be only 32" DBH. Is City arborists verifying the close DBH values and species? Will any of these large trees be retained following the short plat subdivision which was to maximize the retention of existing trees by criteria #6? The Net Result? *Increasing Seattle's Urban Heat Island ranking from #10 nationwide.*

*Pro-development that also considers space for trees to counter local climate change.*

*David Moehring*

*TreePAC Volunteer*

[Arborist Report](#) 320 KB 12/18/19 [6758839-CN-001](#) Construction Application Intake

# Species Dbh CSD Condition and Status

- 1 Arborvitae (Thuja occidentalis) 4 4 Good condition and health. Not exceptional.
- 2 Arborvitae (Thuja occidentalis) 4 4 Good condition and health. Not exceptional.
- 3 Colorado blue spruce (Picea pungens) 16 14 Good condition and health. Not exceptional.
- 4 Western red cedar (Thuja plicata) 17 34 Fair condition and health. Not exceptional.
- 5 Lawsons cypress 28 32 Fair condition. Multiple trunks (Chamaecyparis lawsoniana) from topping. Not exceptional.
- 6 Lawsons cypress 20 32 Fair condition. Multiple trunks from topping. Not exceptional.
- 7 Saucer magnolia 6 16' Good condition and health. Not exceptional.

What about the big ponderosa pine at the street?

Rowhouses at street Address:1119 NW 57TH ST

Project:3036708-LU

Area: North/Northwest

Notice Date:8/10/2020

Project Description Land Use Application to subdivide one development site into three unit lots. The construction of residential units is under Project

#6759358-CN. This subdivision of property is only for the purpose of allowing sale or lease of the unit lots. Development standards will be applied to the original parcel and not to each of the new unit lots.

Townhouse behind rowhouses Address:1117 NW 57TH ST

Where is 191200-ULS\_1117.pdf SDCI\_EXT\_PREAPPLICATION/Site Plan 06/10/2020

Project:3036709-LU

Area: North/Northwest

Notice Date:8/10/2020

Project Description Land Use Application to subdivide one development site into three unit lots. The construction of residential units is under Project #6758839-CN. This subdivision of property is only for the purpose of allowing sale or lease of the unit lots. Development standards will be applied to the original parcel and not to each of the new unit lots. Comments may be submitted through:08/24/2020

KHALEGHI

SALMAN

Address: 1126 NW 57TH ST 9810

NEWMAN JONATHAN

D

Address: 1124 NW 57TH ST 98107

: ALQUIST MARGARET

Address: 1112 NW 57TH ST 98107

WONG CANDICE

Address: 1118 NW 57TH ST 98107

NIEMER MARY

Address: 1101 NW 57TH ST  
98107

BROCKMAN FRANK W JR

Address: 1107 NW 57TH ST 98107

BAISDEN THOMAS

+AMELIA

Address: 1113 NW 57TH ST 98107

XU RUI+YOSHIDA

ELDER

Address: 1147 NW 57TH ST 98107

WENDEL JOHN

NICKERSON

Address: 1143 NW 57TH ST 98107

MEGHAAN M

BLAUVELT

Address: 1137 NW 57TH ST 98107

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Help support TreePAC's efforts to create a stronger tree ordinance, more informed residents, and more informed City Officials.

Guide to save trees before it is too late:

<https://treepac.org/step-by-step-saving-seattle-trees-guide-new/>

Donate to non-profit TreePAC:

<https://donorbox.org/support-treepac-and-seattle-s-urban-forest?>

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You received this message because you are subscribed to the Google Groups "SeattleTreeLoss" group.

To unsubscribe from this group and stop receiving emails from it, send an email to

[seattletreeloss+unsubscribe@googlegroups.com](mailto:seattletreeloss+unsubscribe@googlegroups.com).

To view this discussion on the web visit <https://groups.google.com/d/msgid/seattletreeloss/trinity-630ef81e-46c4-41c7-8fd5-ca82ea4a2d56-1597123508777%403c-app-mailcom-lxa09>

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From: jemskink@everyactioncustom.com <jemskink@everyactioncustom.com>

Sent: Friday, August 14, 2020 10:29 AM

To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

Subject: Need to Strengthen Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

We need more nature now, not less. Trees are a vital part of any ecosystem. They are not just ornamentation.

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCI is no longer concerned about the fate of the smaller, non-exceptional trees.
- Protect red alders, black cottonwoods, and bitter cherries. These native trees provide important resources to birds and other wildlife and contribute to our sense of place in Seattle. Following the "right tree, right place" philosophy, these native trees can safely thrive and should be protected like other species.
- Expand the definition of tree groves to stands of six or more trees at least six inches in diameter, including street trees. Tree groves provide important habitat for birds and are becoming less common outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove.
- Require public notice postings on development site and online for removal of Exceptional trees, even when hazardous, to ensure community members know when and where legal tree removal is occurring.
- Require replacement for trees removed from groves and removed hazard trees.
- Align SDCI's proposed Tree Care Provider Acknowledgement with SDOT's Tree Service Provider Registration. Do not automatically renew this form annually. It should be updated each year. Reduce the number of infractions tree service providers can incur in a year before they are removed from the City's list to do business from more than three infractions to more than two infractions.
- Section 4: Preference for planting off-site replacement trees on public property is restrictive. The Director should be able to allow replacement trees not only on public property, but also on private property, where desired by the property owner, in order to meet the City's goals and objectives of race and social justice under Seattle's Equity and Environment Initiative.

The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
Joan Miller  
5402 34th Ave SW Seattle, WA 98126-2920 jemskink@gmail.com

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From: cathysark@everyactioncustom.com <cathysark@everyactioncustom.com>

Sent: Friday, August 14, 2020 11:17 AM

To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

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Sincerely,

Cathy Sarkowsky  
304 W Highland Dr Seattle, WA 98119-3547 cathysark@mac.com

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**From:** Annie Thoe <info@email.actionnetwork.org>

**Sent:** Friday, August 14, 2020 11:21 AM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

I am a member of Neighborhood Treekeepers and urge your to please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements. This is one of many letters and I hope the City will act to save our trees.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees

The following changes to the draft Director's Rule are needed:

- Change Subject Title to remove words "land division" and replace with "Development"
- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process,

and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city.”

- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as “a group of 3 or more significant trees with overlapping or touching crowns.” Include street trees in groves.
- Add “Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages.”
- Add “All replacement trees regardless of size are protected trees and can’t be removed.”
- SECTION 2. Change the heading to “TREE PROTECTION”. Remove references to “Exceptional Trees” only and change to “Trees”. e.g., change “Exceptional Tree Protection Areas” to “Tree Protection Areas”.
- SECTION 4. Add “The Director shall have the authority to allow replacement trees on both public and private property to meet the goals and objectives of race and social justice under Seattle’s Equity and Environment Initiative.”
- Under SMC 25.11.090 the Director has the authority to require “one or more trees” to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.
- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats and need to be considered at the beginning of the development process. The language of this SEPA code section should be included in the Director’s Rule to be certain that the code is complied with.
- SECTION 6. SDCI should adopt SDOT’s registration process and requirements to assist Tree Care Providers in complying with city code and regulations. Reduce the number of citations that will remove a Tree Care Provider from being registered with the city to no more than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor’s license to ensure they have workers’ compensation. Require they have a certificate of insurance that lists the

city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

Annie Thoe

[anniethoe@gmail.com](mailto:anniethoe@gmail.com)

2201 NE 120th St

Seattle, Washington 98125

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**From:** Bonnie Miller <bmillerv@serv.net>  
**Sent:** Friday, August 14, 2020 11:26 AM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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Thank you for protecting our urban forest.

Bonnie Miller

[bmiller@serv.net](mailto:bmiller@serv.net)

900 University Street, Apt 15BC

Seattle, Washington 98101-1730

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**From:** Karen Costarella <info@email.actionnetwork.org>

**Sent:** Friday, August 14, 2020 11:44 AM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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Karen Costarella

[kpcostarella@gmail.com](mailto:kpcostarella@gmail.com)

2220 NE 130th St

Seattle, Washington 98125

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**From:** Judith Leconte <info@email.actionnetwork.org>

**Sent:** Friday, August 14, 2020 11:49 AM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI’s Director’s Rule 13-2020

Sandra Pinto de Bader,

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Thank you for protecting our urban forest. PLEASE SAVE SEATTLE TREES!

Judith Leconte

[tbacgster@gmail.com](mailto:tbacgster@gmail.com)

P O Box 15505  
Seattle, Washington 98115

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**From:** Moani Russell <info@email.actionnetwork.org>  
**Sent:** Friday, August 14, 2020 12:00 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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- PURPOSE AND BACKGROUND. add “SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city.”
- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as “a group of 3 or more significant trees with overlapping or touching crowns.” Include street trees in groves.
- Add “Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages.”
- Add “All replacement trees regardless of size are protected trees and can’t be removed.”
- SECTION 2. Change the heading to “TREE PROTECTION”. Remove references to “Exceptional Trees” only and change to “Trees”. e.g., change “Exceptional Tree Protection Areas” to “Tree Protection Areas”.
- SECTION 4. Add “The Director shall have the authority to allow replacement trees on both public and private property to meet the goals and objectives of race and social justice under Seattle’s Equity and Environment Initiative.”
- Under SMC 25.11.090 the Director has the authority to require “one or more trees” to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.
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Thank you for protecting our urban forest.

Moani Russell

[moanirussell@gmail.com](mailto:moanirussell@gmail.com)

7526 39th Ave NE

Seattle, Washington 98115

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**From:** Judith Leshner <jack2729rabbit@earthlink.net>  
**Sent:** Friday, August 14, 2020 12:00 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Good Day:

I am so encouraged to learn that our City is taking action to provide more protections for our trees. The City Council in 2006 declared the importance of protecting our tree canopy. I have written many emails to members of the City Council about updating the Tree Ordinance so I am feeling hopeful that you will adopt these rules of protections.

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated

Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
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Thank you for protecting our urban forest.

Sincerely,

Judith Leshner

Judith Leshner

[jack2729rabbit@earthlink.net](mailto:jack2729rabbit@earthlink.net)

2568 10th Ave W

Seattle, Washington 98119

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**From:** CLAYTON SMITH <info@email.actionnetwork.org>

**Sent:** Friday, August 14, 2020 12:05 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

CLAYTON SMITH

[claytn8@gmail.com](mailto:claytn8@gmail.com)

4328 South Holden Street,  
SEATTLE, Washington 98118

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**From:** Carolyn Crockett <info@email.actionnetwork.org>  
**Sent:** Friday, August 14, 2020 12:10 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

I live near Northacres Park and in a neighborhood with quite a few exceptional and significant trees. I enthusiastically support the long-overdue SDCI's Director's Rule, with amendments proposed by the Seattle Urban Forestry Commission.

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

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Thank you for protecting our urban forest.

Carolyn Crockett

[ccrockett@mac.com](mailto:ccrockett@mac.com)

13034 1st Ave NE

Seattle, Washington 98125

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**From:** Sue Nicol <info@email.actionnetwork.org>

**Sent:** Friday, August 14, 2020 12:17 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

I am a retired horticulturist and consulting arborist. I have lived in Seattle for forty years and care deeply about the loss of Seattle's tree canopy to density and development. I urge you to move forward to adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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Thank you for protecting our urban forest.

Susan M. Nicol

Sue Nicol

[susanmnicol@gmail.com](mailto:susanmnicol@gmail.com)

4310 Sunnyside Avenue North

Seattle, Washington 98103

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**From:** Anita Shelton <info@email.actionnetwork.org>

**Sent:** Friday, August 14, 2020 12:17 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI’s Director’s Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

Anita Shelton

[anitamshel@gmail.com](mailto:anitamshel@gmail.com)

729 N 77th St  
Seattle, Washington 98103

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**From:** Nicole Harvey <info@email.actionnetwork.org>  
**Sent:** Friday, August 14, 2020 12:24 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

As a supporter of HALA and dense urbanism, I believe it's important to make homes within the city. And yet, those homes have less value financially and ecologically if significant trees are lost. I expected that the massive single family lots across the street would be sold for multifamily housing and welcome this change, but hadn't anticipated that so many large trees would be cut down. This area of north Ballard/Crown Hill/Whittier Heights isn't rich in street trees, so the conifers on NW 83rd and 13th Avenue NW are of high value for water retention, habitat, carbon offset, and windbreak.

According to the developer of the 13th Avenue NW project, only one tree would be retained given the current legislation--that represents a loss of many trees that cannot be replaced. This is only one small block of North Seattle--played out across the city, the ecological effects are devastating.

Within Seattle, there are some great examples of keeping existing trees while developing new housing--one project in Bryant Park seemed to have saved most of their trees. Isn't it worth it to save what is essentially a symbol of our city and our state?

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Thank you for protecting our urban forest.

Nicole Harvey

[the.nicole.harvey@gmail.com](mailto:the.nicole.harvey@gmail.com)

1215 NW 83rd Street

Seattle, Washington 98117

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**From:** Barbara Gregory <info@email.actionnetwork.org>  
**Sent:** Friday, August 14, 2020 12:33 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI’s Director’s Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."
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maintain a diversity of tree species and ages.”

- Add “All replacement trees regardless of size are protected trees and can’t be removed.”
- SECTION 2. Change the heading to “TREE PROTECTION”. Remove references to “Exceptional Trees” only and change to “Trees”. e.g., change “Exceptional Tree Protection Areas” to “Tree Protection Areas”.
- SECTION 4. Add “The Director shall have the authority to allow replacement trees on both public and private property to meet the goals and objectives of race and social justice under Seattle’s Equity and Environment Initiative.”
- Under SMC 25.11.090 the Director has the authority to require “one or more trees” to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.
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Thank you for protecting our urban forest.

Barbara Gregory

[barbara\\_gregory@yahoo.com](mailto:barbara_gregory@yahoo.com)

3538 Northeast 86th Street  
Seattle, Washington 98115

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**From:** Carolyn Rodenberg <carolynrodenberg@mindspring.com>  
**Sent:** Friday, August 14, 2020 12:41 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
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Thank you for protecting our urban forest.

Carolyn Rodenberg

[carolynrodenberg@mindspring.com](mailto:carolynrodenberg@mindspring.com)

2121 8th Ave West

Seattle, Washington 98119-2240

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**From:** Arianne Misener <info@email.actionnetwork.org>

**Sent:** Friday, August 14, 2020 12:44 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

Arianne Misener

[almisener@hotmail.com](mailto:almisener@hotmail.com)

7717 Aurora Avenue north

Seattle, Washington 98103

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**From:** Ericka Berg <info@email.actionnetwork.org>  
**Sent:** Friday, August 14, 2020 1:30 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

Ericka Berg

[ericka98115@gmail.com](mailto:ericka98115@gmail.com)

8217 5th ave ne

seattle, Washington 98115

**From:** cncostarella@yahoo.com <info@email.actionnetwork.org>  
**Sent:** Friday, August 14, 2020 1:32 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

[cncostarella@yahoo.com](mailto:cncostarella@yahoo.com)

2220 NE 130th Street

Seattle, Washington 98125

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**From:** David Miller <david@millerdavid.com>

**Sent:** Friday, August 14, 2020 1:33 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Supporting Proposed Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

I am beyond thrilled to see the draft of DR 13-2020. It is a great step forward in the effort to balance the climate and rainwater benefits of trees with personal property rights. I would make a few observations I believe pertinent to decision making along the process to finalize the rule.

No tree rule is about a single property. It's easy to get caught up in "this tree is on that parcel", when science shows "this tree" actually benefits all parcels in a surprisingly broad area of influence. We wear masks to help the broader community from contracting COVID-19. We save trees to similarly help the broader community.

I'm especially enthused seeing the protections for evergreen trees. Unless one is very familiar with \*urban\* tree canopy science, and Seattle climate patterns, it is easy to misunderstand the unique advantages evergreens provide over deciduous trees here in Seattle. First, science proves the biggest impact a tree has on rainwater is by holding moisture in the canopy, preventing it from ever reaching the ground (SDOT has published a working paper on this, even). When Seattle gets most of its rainfall, deciduous trees have no leaves. You know this instinctively. When caught out in the rain and faced with a choice of sheltering under a fir tree or a maple tree with no leaves -- you choose the fir tree. This water never hits

the ground as it is evaporated directly from the needles. In Seattle, therefore, deciduous trees do next to nothing for preventing combined sewer overflow incidences.

Additionally, wintertime is when small-particulate air contamination is usually worse in Seattle (recent forest fire events notwithstanding). The inversion layers we get on cold, clear winter days traps these particulates and makes our winter air quality bad. Again, deciduous trees without leaves can't help here while scientific data shows fir trees are very good about trapping these fine particulates.

Urban trees are also special in their ability to take up CO2 close to the source, provide cooling shade over UV-capturing surfaces like concrete and asphalt, and their positive affect on retail activity and home values.

Thank you very much for producing a DR based in the science of urban trees. I wholeheartedly support the implementation of this Rule as written given it contains a science-driven balance between the need to preserve trees and the need for increased housing density in our city.

Warm Regards,  
David Miller  
Seattle, WA

David Miller  
[david@millerdavid.com](mailto:david@millerdavid.com)  
8737 29th Ave NW  
Seattle, Washington 98117

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**From:** Michelle Pavcovich <info@email.actionnetwork.org>  
**Sent:** Friday, August 14, 2020 1:53 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

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Thank you for protecting our urban forest.

Michelle Pavcovich

[ladiabla333@hotmail.com](mailto:ladiabla333@hotmail.com)

11351 20th Ave NE  
Seattle, Washington 98125

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**From:** Muriel Lawty <info@email.actionnetwork.org>  
**Sent:** Friday, August 14, 2020 2:04 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

I agree with the message below. Our basic right is the right to life. Life depends on a healthy clean environment and our trees are an essential part of a healthy environment.

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Muriel Lawty

[m.g.lawty@gmail.com](mailto:m.g.lawty@gmail.com)

3018 NE 137TH ST, APT 3

SEATTLE, Washington 98125

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**From:** MartinWesterman <artartart@seanet.com>

**Sent:** Friday, August 14, 2020 2:04 PM

**To:** SCI\_DRulesComments <SCI\_DRulesComments@seattle.gov>; LEG\_CouncilMembers <council@seattle.gov>; Durkan, Jenny <Jenny.Durkan@seattle.gov>; Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>; Emery, Chanda <Chanda.Emery@Seattle.gov>; Torgelson, Nathan <Nathan.Torgelson@seattle.gov>

**Subject:** Adopt SDCI Director's Rule 13-2020 without delay -- Seattle Green Spaces Coalition

**CAUTION: External Email**

Greetings Director Torgelson, Mayor, Council Members, and esteemed leaders,

The Seattle Greens Spaces Coalition, representing dozens of organizations and thousands of your constituents in the greater Seattle area, urges you to adopt, with amendments, SDCI's Director's Rule 13-2020. Its full title: "Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements."

Please end 11 years of delay since urban forest protections were first proposed by the Seattle City Council in 2009, and adopt this updated Director's Rule with proposed amendments now.

In community as we work to make Seattle a more sustainable, resilient, equitable and livable city,

Martin Westerman, and the Board of

Attachment: SGSC letter



SEATTLE GREEN SPACES COALITION

August 14, 2020

Nathan Torgelson, Director  
Seattle Department of Construction and Inspections  
700 Fifth Avenue, Suite 2000  
P.O. Box 34019  
Seattle, WA 98124-4019

Re: Adopt SDCI Director's Rule 13-2020 without delay

Greetings Director Torgelson,

The Seattle Greens Spaces Coalition, representing dozens of organizations and thousands of constituents in the greater Seattle area, urges you to adopt, with amendments, SDCI's Director's Rule 13-2020. Its full title: "Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements."

Seattle must adopt this updated Director's Rule with proposed amendments now. Please end 11 years of delay since urban forest protections were first proposed by the Seattle City Council in 2009.

Here are proposed updates:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove

- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees

Here are proposed amendments:

- Change Subject Title to remove words “land division” and replace with “Development”
- PURPOSE AND BACKGROUND. add “SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city.”
- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as “a group of 3 or more significant trees with overlapping or touching crowns.” Include street trees in groves.
- Add “Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages.”
- Add “All replacement trees regardless of size are protected trees and can’t be removed.”
- SECTION 2. Change the heading to “TREE PROTECTION”. Remove references to “Exceptional Trees” only and change to “Trees”. e.g., change “Exceptional Tree Protection Areas” to “Tree Protection Areas”.
- SECTION 4. Add “The Director shall have the authority to allow replacement trees on both public and private property to meet the goals and objectives of race and social justice under Seattle’s Equity and Environment Initiative.”
- Under SMC 25.11.090 the Director has the authority to require “one or more trees” to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.
- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats and need to be considered at the beginning of the development process. The language of this SEPA code section should be included in the Director’s Rule to be certain that the code is complied with.
- SECTION 6. SDCI should adopt SDOT’s registration process and requirements to assist Tree Care Providers in complying with city code and regulations. Reduce the number of citations that will remove a Tree Care Provider from being registered with the city to no more than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor’s license to ensure they have workers’ compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially signed off on the specific work being done.

Thank you for helping make Seattle a more equitable, sustainable, resilient and livable city, by protecting our urban forest and green spaces

*Martin Westerman*

Martin Westerman, President  
Elaine Ike and Mary Fleck, Co-Founders  
For the Board of  
Seattle Green Spaces Coalition / [SGSC](#)

---

**From:** Martin Westerman <artartart@seanet.com>  
**Sent:** Friday, August 14, 2020 2:55 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Adopt SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

I urge you to adopt, with amendments, SDCI's Director's Rule 13-2020. Its full title: "Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements."

Please end 11 years of delay since urban forest protections were first proposed by the Seattle City Council in 2009, and adopt this updated Director's Rule now. .

Here are proposed updates:

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SMC 25.11.090

- Tightening tree removal requirements for exceptional trees as hazard trees

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Thank you for helping make Seattle a more livable, sustainable, resilient and equitable city by protecting our urban forest and green spaces.

Martin Westerman

[artartart@seanet.com](mailto:artartart@seanet.com)

9361 47th Ave. S.W.

Seattle, Washington 98136

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**From:** Torgelson, Nathan <Nathan.Torgelson@seattle.gov>

**Sent:** Friday, August 14, 2020 3:43 PM

**To:** Pedersen, Alex <Alex.Pedersen@seattle.gov>; LEG\_CouncilMembers <council@seattle.gov>; Emery, Chanda <Chanda.Emery@Seattle.gov>; Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>; Strauss, Dan <Dan.Strauss@seattle.gov>; DOT\_SeattleTrees <Seattle.Trees@seattle.gov>; Pederson, Art <Art.Pederson@seattle.gov>; McGarry, Deborah <Deborah.McGarry@seattle.gov>

**Cc:** Postlewait, Christina <Christina.Postlewait@Seattle.gov>

**Subject:** RE: 6851 40th Ave NE

Dear Councilmembers---please see attached our response to Mr. Niven and the installation of tree protection during this construction project.

Nathan

**From:** Rasmussen, Betty <Betty.Rasmussen@seattle.gov>

**Sent:** Friday, August 14, 2020 12:42 PM

**To:** Stuart Niven <panorarbor@gmail.com>

**Cc:** Torgelson, Nathan <Nathan.Torgelson@seattle.gov>; Lumsden, Faith <Faith.Lumsden@seattle.gov>;

Khokhar, Jatinder <Jatinder.Khokhar@seattle.gov>

**Subject:** 6851 40th AVE NE and 6850 39th AVE NE

Dear Mr. Niven,

Thank you for bringing your concerns regarding the development of 6851 40<sup>th</sup> AVE NE and 6850 39<sup>th</sup> AVE NE to our attention. I assure you that SDCI is also passionate about tree protection in Seattle. We are committed to finding balance between tree preservation while allowing for the development of private property.

Tree protection has been installed for the Exceptional Deodar tree located on the adjacent property to the new development at 6851 40<sup>th</sup> AVE NE. The developer recognizes that this is an exceptional tree and is committed to protecting it. The consulting arborist is Doug Smith from Seattle Tree. The developer has also decided to retain a tree previously marked for removal, a Western Red Cedar, #10 in the arborist report.

SDCI will continue our efforts to implement and enforce the Tree Protection Code in Seattle. I have recently highlighted some of the challenges my colleagues and I face in tree protection enforcement to our code compliance leadership team. We are now renewing a focus on working with Inspection Services and our permit review divisions to emphasize tree protection requirements.

Thank you again for your interest.

Sincerely,



Betty Rasmussen  
Inspection Support Analyst  
Seattle Department of Construction and Inspections  
O: 206-684-5839 | [betty.rasmussen@seattle.gov](mailto:betty.rasmussen@seattle.gov)  
[Facebook](#) | [Twitter](#) | [Blog](#)

*Helping people build a safe, livable, and inclusive Seattle.*

*SDCI is working with our partners at [Public Health – Seattle & King County](#), [Washington State Department of Health](#), and the [Centers for Disease Control and Prevention](#) to help limit the spread of COVID-19 while doing our best to continue providing services to our customers. Visit the [SDCI website](#) and read our [Building Connections blog](#) for service change updates.*

### **Original email**

**From:** Stuart Niven <[panorarbor@gmail.com](mailto:panorarbor@gmail.com)>

**Sent:** Monday, July 27, 2020 4:57 PM

**To:** Pedersen, Alex <[Alex.Pedersen@seattle.gov](mailto:Alex.Pedersen@seattle.gov)>; LEG\_CouncilMembers <[council@seattle.gov](mailto:council@seattle.gov)>;

Torgelson, Nathan <[Nathan.Torgelson@seattle.gov](mailto:Nathan.Torgelson@seattle.gov)>; Emery, Chanda <[Chanda.Emery@Seattle.gov](mailto:Chanda.Emery@Seattle.gov)>;

Durkan, Jenny <[Jenny.Durkan@seattle.gov](mailto:Jenny.Durkan@seattle.gov)>; Pinto de Bader, Sandra <[Sandra.Pinto\\_de\\_Bader@Seattle.gov](mailto:Sandra.Pinto_de_Bader@Seattle.gov)>; Strauss, Dan <[Dan.Strauss@seattle.gov](mailto:Dan.Strauss@seattle.gov)>; DOT\_SeattleTrees <[Seattle.Trees@seattle.gov](mailto:Seattle.Trees@seattle.gov)>; Pederson, Art <[Art.Pederson@seattle.gov](mailto:Art.Pederson@seattle.gov)>; McGarry, Deborah <[Deborah.McGarry@seattle.gov](mailto:Deborah.McGarry@seattle.gov)>  
**Subject:** 6851 40th Ave NE

**CAUTION: External Email**

Good afternoon,

A short email to highlight another example of how there is NO tree protection in Seattle, on private property.

If you search the above property on Google and look at the maps with the satellite image, you will see a double lot with one house in the middle and trees on all sides, with literally no view to the ground at any point beyond the roof of the house.

The property has since been razed, leaving only random individual trees that border adjacent properties, with the typical subdivision approved so more than one building can be erected in place of the original building which from what i can tell was perfectly habitable.

I do see the arborist report for the development and a correction from SDCI about the fact adjacent trees had not been recorded in the tree inventory, but it was this issue that caught my eye as I drove by as I noticed the property to the South has an 'exceptional' deodar cedar on it which has not been protected and from what I can tell, the new building will likely be built within the inner root zone of the tree which is not permitted by the current SMC 25.11.050 which from what I can see means both SDCI and the developer are in violation of the current codes for tree protection during construction.

I have submitted yet another complaint through the portal but thought you should take a look at this as a good example of how the tree ordinance is not working to save trees as yet another property what was fully tree'd is not without any trees and the ones left, including neighbouring trees, will likely decline and die, fail or be removed by the new owners of each property as they are not good looking trees as they used to be surrounded by others and now are stand alone and relatively unattractive trees.

This is a clear example of why development should not have special privileges when it comes to how many trees can be removed from a property. It simply is not sustainable and yet another shaded property will become a hot, dusty mix of concrete, glass and siding which will increase the temperature of the neighbourhood, provide no habitat for wildlife and basically be an eye sore.

What are we doing here?

Thank you and kind regards,

Stuart Niven, BA (Hons)

*PanorArborist*

[ISA Certified Arborist PN-7245A & Tree Risk Assessment Qualification \(TRAQ\)](#)

[Arborist on Seattle Audubon Society Conservation Committee](#)

[Arborist on Seattle's Urban Forestry Commission](#)

[Board Member of TreePAC](#)

Company Website [www.panorarbor.com](http://www.panorarbor.com) Tel/Text: 206 501 9659

[WA Lic# PANORL\\*852P1](#) (Click to link to WA L&I's Verify a Contractor Page)

---

**From:** Susan Seniuk <info@email.actionnetwork.org>

**Sent:** Friday, August 14, 2020 3:14 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
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The following changes to the draft Director's Rule are needed:

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- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."
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Thank you for protecting our urban forest.

Susan Seniuk

[straw2gold@yahoo.com](mailto:straw2gold@yahoo.com)

11327 20th Avenue NE

Seattle, Washington 98125

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**From:** Lisa Westgard <info@email.actionnetwork.org>

**Sent:** Friday, August 14, 2020 3:26 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Dear Sirs/Ms.

Although I don't live in the City of Seattle any more I strongly support Tree Protection in all Urban areas. Since living in Des Moines, WA for the last 6 years I have witnessed large trees being cut down all around me, much to my dismay.

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection

for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

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Thank you for protecting our urban forest.

Sincerely, Lisa Westgard

Lisa Westgard

[kailine94@hotmail.com](mailto:kailine94@hotmail.com)

240 S. 198th St

Des Moines, WA, Washington 98148

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**From:** Mary Gwinn <mgwinn@bookcritics.org>

**Sent:** Friday, August 14, 2020 3:39 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue. In my neighborhood of West Seattle, I continue to see trees cut and removed to accommodate housing that will accommodate a very few. This action robs the city of an increasing percentage of its tree cover.

The following updates as proposed in the draft Director's Rule are great steps forward:

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Thank you for protecting our urban forest.

Mary Ann Gwinn

Mary Gwinn

[mgwinn@bookcritics.org](mailto:mgwinn@bookcritics.org)

7814 39th Ave. S.W., Seattle

Seattle, Washington 98136

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**From:** Charna Klein <charnaklein@msn.com>

**Sent:** Friday, August 14, 2020 3:42 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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The following changes to the draft Director's Rule are needed:

- Change Subject Title to remove words "land division" and replace with "Development"
- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."
- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as "a group of 3 or more significant trees with overlapping or touching crowns." Include street trees in groves.
- Add "Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages."
- Add "All replacement trees regardless of size are protected trees and can't be removed."
- SECTION 2. Change the heading to "TREE PROTECTION". Remove references to "Exceptional Trees" only and change to "Trees". e.g., change "Exceptional Tree Protection Areas" to "Tree Protection Areas".
- SECTION 4. Add "The Director shall have the authority to allow replacement trees on both public and private property to meet the goals and objectives of race and social justice under Seattle's Equity and Environment Initiative."
- Under SMC 25.11.090 the Director has the authority to require "one or more trees" to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.
- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats and need to be considered at the beginning of the development process. The language of this SEPA code section should be included in the Director's Rule to be certain that the code is complied with.
- SECTION 6. SDCI should adopt SDOT's registration process and requirements to assist

Tree Care Providers in complying with city code and regulations. Reduce the number of citations that will remove a Tree Care Provider from being registered with the city to no more than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor's license to ensure they have workers' compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

Charna Klein

[charnaklein@msn.com](mailto:charnaklein@msn.com)

6521 36 Ace NE

Seattle , Washington 98115

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From: a.roda@everyactioncustom.com <a.roda@everyactioncustom.com>  
Sent: Friday, August 14, 2020 3:57 PM  
To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCl is no longer concerned about the fate of the smaller, non-exceptional trees.

- Protect red alders, black cottonwoods, and bitter cherries. These native trees provide important resources to birds and other wildlife and contribute to our sense of place in Seattle. Following the "right tree, right place" philosophy, these native trees can safely thrive and should be protected like other species.
- Expand the definition of tree groves to stands of six or more trees at least six inches in diameter, including street trees. Tree groves provide important habitat for birds and are becoming less common outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove.
- Require public notice postings on development site and online for removal of Exceptional trees, even when hazardous, to ensure community members know when and where legal tree removal is occurring.
- Require replacement for trees removed from groves and removed hazard trees.
- Align SDCI's proposed Tree Care Provider Acknowledgement with SDOT's Tree Service Provider Registration. Do not automatically renew this form annually. It should be updated each year. Reduce the number of infractions tree service providers can incur in a year before they are removed from the City's list to do business from more than three infractions to more than two infractions.
- Section 4: Preference for planting off-site replacement trees on public property is restrictive. The Director should be able to allow replacement trees not only on public property, but also on private property, where desired by the property owner, in order to meet the City's goals and objectives of race and social justice under Seattle's Equity and Environment Initiative.

The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
 Anne Roda  
 1130 N 82nd St Seattle, WA 98103-4460  
 a.roda@comcast.net

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**From:** Joni Vanderburg <info@email.actionnetwork.org>  
**Sent:** Friday, August 14, 2020 5:28 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees

The following changes to the draft Director's Rule are needed:

- Change Subject Title to remove words "land division" and replace with "Development"
- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."
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- Add "Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages."
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Thank you for protecting our urban forest.

Joni Vanderburg

[joni.vanderburg@gmail.com](mailto:joni.vanderburg@gmail.com)

[joni.vanderburg@gmail.com](mailto:joni.vanderburg@gmail.com)

Bellevue, Washington 98007

**From:** Chelsea DeWater <info@email.actionnetwork.org>  
**Sent:** Friday, August 14, 2020 4:00 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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Thank you for protecting our urban forest.

Chelsea DeWater

[Cheebergirl@gmail.com](mailto:Cheebergirl@gmail.com)

6212 Crow Ln

Austin, Texas 78745

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**From:** andrea Faste <amfaste@comcast.net>

**Sent:** Friday, August 14, 2020 4:33 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

It is high time to put in place a strong direction for saving Seattle's big, old trees. Even though I complain about shade from 3 large cedars in my southern neighbor's backyard, I know that we need trees to help keep our air clean. I'm joining SaveOurTrees in asking for the adoption of SDCI's Director's Rule 13-2020 as below. We need action before another decade goes by.

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

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Thank you for protecting our urban forest.

andrea Faste

[amfaste@comcast.net](mailto:amfaste@comcast.net)

7713 11th Av NW

Seattle, Washington 98117

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**From:** Patricia Ann <info@email.actionnetwork.org>  
**Sent:** Friday, August 14, 2020 4:48 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division,

including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

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Thank you for protecting our urban forest.

Patricia Ann

[purpletea711@yahoo.com](mailto:purpletea711@yahoo.com)

800 Jefferson Street

Seattle , Washington 98104

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**From:** Sandy Shettler <sshettler@msn.com>

**Sent:** Friday, August 14, 2020 5:05 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

I'm writing to express support for the new tree ordinance, with UFC amendments.

Last week a gorgeous native hemlock was removed up the block from my house by a developer. It was just 1" DBH shy of being exceptional, and it was on the periphery of the lot being developed! The developer said he wanted to "clean up" the lot even though the new house will not come anywhere near it. It was healthy and beautiful and our neighborhood is saddened by this loss. Our whole city also feels the cumulative loss of these trees with increased heat and pollution.

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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Thank you for protecting our urban forest.

Sincerely,

Sandy Shettler

Sandy Shettler

[sshettler@msn.com](mailto:sshettler@msn.com)

7419 Woodlawn Ave NE

Seattle, Washington 98115

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**From:** Sonia Lyris <info@email.actionnetwork.org>

**Sent:** Friday, August 14, 2020 5:26 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** urging you to adopt SDCI's Director's Rule 13-2020 with ammendments

**CAUTION: External Email**

Sandra Pinto de Bader,

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- SECTION 6. SDCI should adopt SDOT's registration process and requirements to assist Tree Care Providers in complying with city code and regulations. Reduce the number of citations that will remove a Tree Care Provider from being registered with the city to no more than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor's license to ensure they have workers' compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

Sincerely,

Sonia Lyris

Sonia Lyris

[slyris@gmail.com](mailto:slyris@gmail.com)

PO Box 31181

SEATTLE, Washington 98103

---

**From:** Jo Iacofano <Jojo@jojo-graphics.com>

**Sent:** Friday, August 14, 2020 5:33 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees

The following changes to the draft Director's Rule are needed:

- Change Subject Title to remove words "land division" and replace with "Development"
- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."
- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as "a group of 3 or more significant trees with overlapping or touching crowns." Include street trees in groves.
- Add "Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to

maintain a diversity of tree species and ages.”

- Add “All replacement trees regardless of size are protected trees and can’t be removed.”
- SECTION 2. Change the heading to “TREE PROTECTION”. Remove references to “Exceptional Trees” only and change to “Trees”. e.g., change “Exceptional Tree Protection Areas” to “Tree Protection Areas”.
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Thank you for protecting our urban forest.

Jo Iacofano

[Jojo@jojo-graphics.com](mailto:Jojo@jojo-graphics.com)

6560 159th Ave NE  
Redmond , Washington 98052

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**From:** Corrie Watterson <info@email.actionnetwork.org>  
**Sent:** Friday, August 14, 2020 5:34 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

Corrie Watterson

[corrie.watterson@gmail.com](mailto:corrie.watterson@gmail.com)

3519 E SPRUCE ST

Seattle, Washington 98122

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**From:** Patricia Murphy <murphy.patricia@live.com>  
**Sent:** Friday, August 14, 2020 5:36 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

Patricia Murphy

[murphy.patricia@live.com](mailto:murphy.patricia@live.com)

8835 Burke Ave N

Seattle , Washington 98103

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**From:** Jesse Taylor <info@email.actionnetwork.org>  
**Sent:** Friday, August 14, 2020 5:41 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

Jesse Taylor

[jesseoaktaylor@gmail.com](mailto:jesseoaktaylor@gmail.com)

30th Ave NE

Seattle, Washington 98115

**From:** Michael Byrd <byrd4646@msn.com>  
**Sent:** Friday, August 14, 2020 5:44 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

Michael Byrd

[byrd4646@msn.com](mailto:byrd4646@msn.com)

414 Malden ave E, E

Seattle, Washington 98112

---

**From:** Meredith Foster <info@email.actionnetwork.org>

**Sent:** Friday, August 14, 2020 5:49 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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SMC 25.11.090

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Thank you for protecting our urban forest.

Meredith Foster

[meredithfosterjo@gmail.com](mailto:meredithfosterjo@gmail.com)

1011 east terrace street

Seattle , Washington 98122

---

**From:** Debbi Pratt <info@email.actionnetwork.org>  
**Sent:** Friday, August 14, 2020 5:49 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

Debbi Pratt

[debbi77777@hotmail.com](mailto:debbi77777@hotmail.com)

3535 27th pl w

seattle, Washington 98199

---

**From:** Kimberly Fulton <info@email.actionnetwork.org>

**Sent:** Friday, August 14, 2020 5:49 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
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- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees

The following changes to the draft Director's Rule are needed:

- Change Subject Title to remove words "land division" and replace with "Development"
- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."
- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as "a group of 3 or more significant trees with overlapping or touching crowns." Include street trees in groves.
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maintain a diversity of tree species and ages.”

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Thank you for protecting our urban forest.

Kimberly Fulton

[kjfulton@gmail.com](mailto:kjfulton@gmail.com)

4517 Renton Ave S  
Seattle, Washington 98108

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**From:** Scott Mahood <info@email.actionnetwork.org>  
**Sent:** Friday, August 14, 2020 5:53 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

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Thank you for protecting our urban forest.

Scott Mahood

[scottmahood@hotmail.com](mailto:scottmahood@hotmail.com)

3530 se hawthorne blvd

portland, Oregon 97214

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**From:** Bonnie Bledsoe <info@email.actionnetwork.org>

**Sent:** Friday, August 14, 2020 5:57 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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Bonnie Bledsoe

[bonnielynnseattle@gmail.com](mailto:bonnielynnseattle@gmail.com)

11010 28th Ave NE

Seattle, Washington 98125

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**From:** Victoria King <info@email.actionnetwork.org>  
**Sent:** Friday, August 14, 2020 5:57 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

I have lived in View Ridge for 46 years. The number of beautiful large trees that were in our neighborhood when we moved in have been reduced to a small fraction. A case in point occurred about 15 years ago, around the corner from our home, when a developer bought a large lot, illegally cut down 10 mature Douglas Fir trees so he could build two million-dollar homes and rake in the profits. He did not even pay a fine for this crime.

Now the trees keep coming down as massive homes are built in place of modest-sized houses built after the war and there's not even room for a modest tree on these lots.

Seattle is no longer the Emerald City Seattle and unless the City stands firm against developers, the damage will just escalate. It's time to adopt rules with teeth in them and make them stick. The developers are here for short-term profits. How about those of us who live here? We deserve to have a say and I say protect trees!

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Victoria King

[vkbirder@gmail.com](mailto:vkbirder@gmail.com)

7326 55th Ave NE

Seattle, Washington 98115

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**From:** Barbara Fristoe <info@email.actionnetwork.org>  
**Sent:** Friday, August 14, 2020 6:01 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

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Barbara Fristoe

[bfristoe@mac.com](mailto:bfristoe@mac.com)

3418 16th Ave S

Seattle , Washington 98144

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**From:** Thomas Everill <info@email.actionnetwork.org>  
**Sent:** Friday, August 14, 2020 6:03 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

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Thomas Everill

[thomasjeverill@gmail.com](mailto:thomasjeverill@gmail.com)

8051 Dibble Avenue NW

Seattle, Washington 98117

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**From:** John Vance <info@email.actionnetwork.org>

**Sent:** Friday, August 14, 2020 6:05 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI’s Director’s Rule 13-2020

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John Vance

[johnvance@gmail.com](mailto:johnvance@gmail.com)

3438 23rd Ave W  
Seattle, Washington 98199

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**From:** Lori Bellamy <lori@loribellamy.com>  
**Sent:** Friday, August 14, 2020 6:12 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

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- Change Subject Title to remove words “land division” and replace with “Development”
- PURPOSE AND BACKGROUND. add “SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city.”
- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as “a group of 3 or more significant trees with overlapping or touching crowns.” Include street trees in groves.
- Add “Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages.”
- Add “All replacement trees regardless of size are protected trees and can’t be removed.”
- SECTION 2. Change the heading to “TREE PROTECTION”. Remove references to “Exceptional Trees” only and change to “Trees”. e.g., change “Exceptional Tree Protection Areas” to “Tree Protection Areas”.
- SECTION 4. Add “The Director shall have the authority to allow replacement trees on both public and private property to meet the goals and objectives of race and social justice under Seattle’s Equity and Environment Initiative.”
- Under SMC 25.11.090 the Director has the authority to require “one or more trees” to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.
- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats and need to be considered at the beginning of the development process. The language of this SEPA code section should be included in the Director’s Rule to be certain that the code is complied with.
- SECTION 6. SDCI should adopt SDOT’s registration process and requirements to assist Tree Care Providers in complying with city code and regulations. Reduce the number of citations that will remove a Tree Care Provider from being registered with the city to no more

than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor's license to ensure they have workers' compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

Lori Bellamy

[lori@loribellamy.com](mailto:lori@loribellamy.com)

12th Ave NW

Seattle, Washington 98117

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**From:** Leila El-Wakil <info@email.actionnetwork.org>  
**Sent:** Friday, August 14, 2020 6:16 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches

- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees

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Please ensure that Seattle doesn't become an urban heat island, as temperatures gradually warm. Especially developers who count recreation areas within a building toward setback requirements; require developers who remove exceptional trees and trees over 24 inches DSH to replace them on site or elsewhere in the city.

Thank you for protecting our urban forest.

Leila El-Wakil

Leila El-Wakil

[leilanadja@gmail.com](mailto:leilanadja@gmail.com)

7742 19th Ave NW

Seattle, Washington 98117

---

**From:** Derek Benedict <dsbened@frontier.com>

**Sent:** Friday, August 14, 2020 6:23 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

Derek Benedict

[dsbened@frontier.com](mailto:dsbened@frontier.com)

709 212th PL SW  
Lynnwood, Washington 98036

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**From:** Dean Drugge <info@email.actionnetwork.org>  
**Sent:** Friday, August 14, 2020 6:25 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

Dean Drugge

[deandrugge@hotmail.com](mailto:deandrugge@hotmail.com)

9515 40TH AVE NE

SEATTLE, Washington 98115

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**From:** Sherry Narens <info@email.actionnetwork.org>

**Sent:** Friday, August 14, 2020 6:26 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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Thank you for protecting our urban forest.

Sherry Narens

[snarens@yahoo.com](mailto:snarens@yahoo.com)

PO Box 99274

Seattle, Washington 98139

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**From:** Christina Masters <info@email.actionnetwork.org>

**Sent:** Friday, August 14, 2020 6:27 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

Christina Masters

[eternally\\_kim@yahoo.com](mailto:eternally_kim@yahoo.com)

310 NE 170th St

Shoreline, Washington 98155

**From:** Susan Storck <info@email.actionnetwork.org>  
**Sent:** Friday, August 14, 2020 6:31 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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Susan Storck

[s.b.storck@gmail.com](mailto:s.b.storck@gmail.com)

5756 29th Ave NE

Seattle , Washington 98105

---

**From:** Deanna Calef <info@email.actionnetwork.org>  
**Sent:** Friday, August 14, 2020 6:37 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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- Under SMC 25.11.090 the Director has the authority to require "one or more trees" to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.
- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats and need to be considered at the beginning of the development process. The language of this SEPA code section should be included in the Director's Rule to be certain that the code is complied with.

- SECTION 6. SDCI should adopt SDOT's registration process and requirements to assist Tree Care Providers in complying with city code and regulations. Reduce the number of citations that will remove a Tree Care Provider from being registered with the city to no more than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor's license to ensure they have workers' compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

Deanna Calef

[deanna.lynnatapleycalef@gmail.com](mailto:deanna.lynnatapleycalef@gmail.com)

10345 Meridian Ave. N.

Seattle, Washington 98133

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**From:** Christopher Buckley <christopher\_buckley@alumni.stanford.edu>

**Sent:** Friday, August 14, 2020 6:54 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees

The following changes to the draft Director's Rule are needed:

- Change Subject Title to remove words "land division" and replace with "Development"
- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."
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Thank you for protecting our urban forest.

Christopher Buckley

[christopher\\_buckley@alumni.stanford.edu](mailto:christopher_buckley@alumni.stanford.edu)

6568 32 32nd Avenue NE

Seattle , Washington 98115-7247

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**From:** Catherine Adams <catharren@live.com>

**Sent:** Friday, August 14, 2020 7:02 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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- Add “All replacement trees regardless of size are protected trees and can’t be removed.”
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I see no reason whatsoever to remove trees for any reason. That includes this imaginary gentrification of Seattle.

Thank you for protecting our urban forest.

Catherine Adams  
[catharren@live.com](mailto:catharren@live.com)  
7903 8th Ave S  
Seattle, Washington 98108

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**From:** Robin Maynard-Dobbs <rock.robin@comcast.net>  
**Sent:** Friday, August 14, 2020 7:09 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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Thank you for protecting our urban forest.

Robin Maynard-Dobbs

[rock.robin@comcast.net](mailto:rock.robin@comcast.net)

322 NW 103rd St

Seattle, Washington 98177

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**From:** Joan Moritz <info@email.actionnetwork.org>  
**Sent:** Friday, August 14, 2020 7:13 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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Thank you for protecting our urban forest.

Joan Moritz

[jzmoritz@gmail.com](mailto:jzmoritz@gmail.com)

5810 Cowen Place NE Apt 103

Seattle, Washington 98105

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From: mj.gilman@everyactioncustom.com <mj.gilman@everyactioncustom.com>  
Sent: Friday, August 14, 2020 7:15 PM  
To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection Save Urban Trees!

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCI is no longer concerned about the fate of the smaller, non-exceptional trees.
- Protect red alders, black cottonwoods, and bitter cherries. These native trees provide important resources to birds and other wildlife and contribute to our sense of place in Seattle. Following the "right tree, right place" philosophy, these native trees can safely thrive and should be protected like other species.
- Expand the definition of tree groves to stands of six or more trees at least six inches in diameter, including street trees. Tree groves provide important habitat for birds and are becoming less common outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove.
- Require public notice postings on development site and online for removal of Exceptional trees, even when hazardous, to ensure community members know when and where legal tree removal is occurring.
- Require replacement for trees removed from groves and removed hazard trees.
- Align SDCI's proposed Tree Care Provider Acknowledgement with SDOT's Tree Service Provider Registration. Do not automatically renew this form annually. It should be updated each year. Reduce the number of infractions tree service providers can incur in a year before they are removed from the City's list to do business from more than three infractions to more than two infractions.
- Section 4: Preference for planting off-site replacement trees on public property is restrictive. The Director should be able to allow replacement trees not only on public property, but also on private property, where desired by the property owner, in order to meet the City's goals and objectives of race and social justice under Seattle's Equity and Environment Initiative.

The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
Mary Gilman  
8043 10th Ave NW Seattle, WA 98117-4122 mj.gilman@comcast.net

From: jbragg50@everyactioncustom.com <jbragg50@everyactioncustom.com>  
Sent: Friday, August 14, 2020 7:23 PM  
To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a member of and volunteer for Seattle Audubon, protecting Seattle's urban forest is important to me. As home owners, my husband and I have supported the city's canopy by planting over 15 conifers and over 20 deciduous trees on our city lot. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

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Sincerely,

Janice Bragg

6235 NE Princeton Way Seattle, WA 98115-7731 jbragg50@comcast.net

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**From:** Tom Foolery <info@email.actionnetwork.org>

**Sent:** Friday, August 14, 2020 7:27 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

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Thank you for protecting our urban forest.

Tom Foolery

[lazytf@gmail.com](mailto:lazytf@gmail.com)

7420 Woodlawn Ave. NE

Seattle, Washington 98115

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**From:** Josh Morris <joshm@seattleaudubon.org>

**Sent:** Friday, August 14, 2020 7:30 PM

**To:** SCI\_DRulesComments <SCI\_DRulesComments@seattle.gov>

**Cc:** LEG\_CouncilMembers <council@seattle.gov>; Durkan, Jenny <Jenny.Durkan@seattle.gov>; Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Public Comment on Proposed DR 13-2020 from Seattle Audubon

**CAUTION: External Email**

Seattle Department of Construction and Inspections:

Thank you for your work to update the SDCI Director's Rule on the designation of exceptional trees and expanding it to include significant trees, tree protection, retention, and tree removal during land division, including tree service provider requirements. We appreciate the improved protections this Rule will provide to the urban forest. However, **we believe the Rule can be simplified and strengthened. Please see our specific comments and recommendations in the attached letter.**

Seattle Audubon urges you to strengthen, adopt, and implement the proposed Director's Rule without delay.

Sincerely,

**Joshua Morris** (he/him)

*Urban Conservation Manager*

Seattle Audubon Society

8050 35<sup>th</sup> Ave NE, Seattle, WA 98115

(206) 523-8243 ext. 112 (work)

(831) 428-6274 (mobile)

[joshm@seattleaudubon.org](mailto:joshm@seattleaudubon.org)

[www.seattleaudubon.org](http://www.seattleaudubon.org)

SEATTLE AUDUBON

FOR BIRDS AND NATURE





August 14, 2020

Public Comments

Department of Construction and Inspections

700 5<sup>th</sup> Ave, #2000

Seattle, WA 98104

*via email to [SCI\\_DRulesComments@seattle.gov](mailto:SCI_DRulesComments@seattle.gov)*

**RE: SDCI Director's Rule 13-2020 Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal During Land Division, Including Tree Service Provider Requirements**

To Whom It May Concern:

On behalf of Seattle Audubon, thank you for your work to update the SCDI Director's Rule on the designation of exceptional trees and expanding it to include significant trees, tree protection, retention, and tree removal during land division, including tree service provider requirements. **Seattle Audubon urges you to strengthen the proposed Rule per the recommendations below and to adopt and implement the Rule without delay.**

Seattle Audubon advocates and organizes for cities where people and birds thrive. Urban forestry is a priority issue for our organization as trees provide important benefits to people and important habitat and food resources to over 100 bird species. **Both people and birds need a healthy, protected, and equitably distributed urban forest to thrive in Seattle.**

While the proposed Director's Rule offers improvements for tree protection, it is based on the current, ineffective tree protection ordinance, which, in effect, pits development against trees. We need an updated ordinance that recognizes the power of trees to enhance property values along with the multiple equity, climate, environmental, and public health services they provide. These are services no growing city should ignore.

A new code will need to include stronger, smarter, and simpler tree protections, including tree removal and replacement permits, a fee-in-lieu payment mechanism, and strong funding for code enforcement. The City also needs oversight and accountability for all urban forestry and tree management decisions in the form of a central Urban Forestry Division, preferably housed at the Office of Sustainability and Environment. And we need more city arborists who have the knowledge and skills to help the City make informed management decisions regarding its critical green infrastructure.

Below we provide specific comments on the proposed Director's Rule 13-2020.

**Seattle Audubon supports the following in the proposed Director's Rule:**

- Expanding the scope of the Rule to include more protections, guidance, and clarity.
- Protecting more exceptional trees by reducing the designation threshold from 30 inches diameter at standard height (DSH) to 24 inches DSH.
- Clarifying the definition of a significant tree.
- Clarifying protections for tree groves and continuing grove protection even after a tree is removed from a grove.
- Acknowledging tree protection and retention starting with the platting process.
- Acknowledging that exceptional trees removed during development must be replaced under existing SMC 25.11.090.
- Tightening requirements for removal of exceptional trees as hazard trees.
- Implementing a worksheet to track tree loss and replacement on private property, assuming that the data will be digitized and compiled in a publicly accessible database.
- Requiring tree care provider registration with the City.

**Seattle Audubon makes the following comments and recommendations to strengthen the proposed Director's Rule:**

**GLOBAL COMMENT**

To fulfill the purpose and intent of existing land use and tree protection codes, as well as to achieve the environmental goals set in the Seattle 2035 Comprehensive Plan, the City must maximize retention of exceptional trees and trees at least six inches DSH (SMC 23.22, SMC 25.11.010, 2035 Seattle Comprehensive Plan EN 1.1 & EN 1.2). Maximizing tree retention must be the goal during land division and throughout any subsequent development on all lots in all zones across the city. The proposed Rule as written does not communicate this goal and seems to imply that maximizing tree retention is limited to only exceptional trees and only during platting.

Please review and revise the rule accordingly. The Subject of the Rule should be changed to read "Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal During Development, Including Tree Service Provider Requirements."

Seattle Audubon also recommends that new text be added to the fourth paragraph of the Purpose and Background section so that it reads: "Applicants shall protect and retain significant and exceptional trees as required per Chapter 25.11 and as further clarified in this Rule. In addition, removal of any stem, root or other tree part on an existing exceptional tree is prohibited unless that action specifically responds to an adopted SMC requirement applicable only when new development is proposed. To meet Seattle's 2035 Comprehensive Plan goals and fulfill the purpose and intent of SMC 23.22 and SMC 25.11, all development projects in all zones across the city shall be designed to maximize the retention of existing trees six inches DSH and larger."

## SECTION 1: DEFINITIONS

1. *Trees not considered exceptional, first bullet point:* The proposed rule excludes trees that "have defects or damage that now or in the foreseeable future will result in increased poor health condition and/or limited life expectancy." This language is so broad and vague that it could arguably apply to nearly any tree in an urban environment. Please tighten the language to avoid overly generous interpretations and over identification of hazard trees. Please use phrases such as "permanent damage" and "continuing declining health," and avoid arbitrary timeframes.

Seattle Audubon notes that trees with defects or damage, including cavities, cracks, and crevices, can provide exceptional habitat and nesting opportunities for birds. Further, our urban forest is severely lacking in snags and coarse woody debris. The value of damaged, dead, and downed trees ought not to be overlooked.

2. *Trees not considered exceptional, second bullet point:* Why are red alders, black cottonwoods, and bitter cherries categorically excluded from protection unless they are part of a grove? These native tree species provide important food and habitat resources for birds and other wildlife. They are quick-growing and can contribute importantly to the city's tree canopy area and volume. Through the Trees for Seattle Tree Walks program, the City highlighted black cottonwoods in Rainier Beach, a neighborhood where the canopy cover is lower than the City average. Following the "right tree, right place" philosophy, these native trees can safely thrive and deserve protections like other trees.
3. *Tree groves:* Why is a grove defined as a "group of eight or more trees where each individual tree has a DSH of twelve inches or greater"? To be consistent with other aspects of the Rule, any *significant* tree ought to contribute to a grove. And where did the number eight come from? Neighboring cities of Duvall, Woodinville, and Kirkland protect groves of just three trees at least six inches DSH with continuous canopy. Groves should be defined more simply and expansively as "a group of at least three significant trees." Any smaller trees and/or vegetation (excluding any species on the noxious weed list) within the grove should be protected as well—they enhance the complexity of the grove, which helps support a diversity and abundance of birds. Seattle Audubon further recommends removing the exclusion of street trees from tree groves. Street trees are no different from trees located across property lines on adjacent lots and there is no ecologic basis to exclude them.

**SECTION 2: EXCEPTIONAL TREE PROTECTION.**

1. Please remove "EXCEPTIONAL" from section heading. The section applies to all trees greater than six inches DSH.
2. *Section 2.1. Exceptional Trees During Platting.* Please remove "Exceptional" from subsection heading. The platting rules apply to all trees six inches DSH and larger.
3. *Section 2.2. Allowable Encroachment in Exceptional Tree Protection Areas During Proposed Development.* Again, please remove "Exceptional" from subsection heading. The rule applies to all trees retained during development.
4. *Section 2.3. Tree Groves.* Tree grove protections should be improved by protecting smaller trees, shrubs and ground cover within a grove. Shrubs and ground cover increase the vegetation complexity and improve habitat values for birds and other wildlife. The City of Portland protects vegetation within groves.

**SECTION 3: EXCEPTIONAL TREE REMOVAL**

1. *Section 3.1. Tree Risk Assessment Required for Tree Removal. Second paragraph.* Please add a requirement for the applicant to post a public notice of hazard tree removal. For example, "This application will require the applicant to submit both an arborist report, a tree risk assessment, and display a public notice at the development site and online for at least 14 days before the tree can be removed." This ensures that neighbors will know when and where legal tree removal is occurring. This should be required for all exceptional trees that SDCI permits for removal and replacement.
2. *Section 3.1. Tree Risk Assessment Required for Tree Removal. Third paragraph and associated bulleted list: A Tree Risk Assessment Qualified (TRAQ) tree service provider will understand the evaluative criteria established by the International Society of Arboriculture.* Please remove the bulleted list all together and revise paragraph three to read: "The tree risk assessment must conclude that the exceptional tree is a "high" risk hazard using the tree risk assessment methodology and criteria established by the International Society of Arboriculture and that the risk cannot be mitigated by pruning, cabling, bracing or other methods that would preserve the tree."
3. *Section 3.1. Tree Risk Assessment Required for Tree Removal. Fourth paragraph.* Please revise definition of "qualified professional" for clarity. It is unclear what "three years' experience in tree evaluation" means. Candidates for ISA Tree Risk Assessment

Qualification must already have three years of full-time experience in arboriculture or a combination of education and practical experience. Does a "qualified professional" per DR 13-2020 require an additional three years' experience? What exactly does "tree evaluation" mean? Does that mean performing tree risk assessments? If so, how would a younger TRAQ certified arborist gain experience if experience is required to receive work in the field?

4. *Section 3.1. Tree Risk Assessment Required for Tree Removal. Fifth paragraph and associated bulleted list. The third bullet point: "International Society of Arborists" should be "International Society of Arboriculture." The "and/or" conjunctions obscure the meaning of this bullet point and the education requirements are not clearly connected to arboriculture or forestry. These educational requirements may be redundant anyway, as the ISA Certified Arborist credential has clear experiential and educational requirements for eligibility. Further educational requirements by the city may disproportionately impact arborists who may not have had the resources for post-secondary education. If the educational requirements are necessary, the point could be clarified by the following:*
  - International Society of Arboriculture (ISA) Certified Arborist with at least one of the following:
    - Associate Degree with at least two courses related to arboriculture or urban forestry;
    - Two years of college-level credits with at least two courses related to arboriculture or urban forestry; and/or
    - 120 Continuing Education Units relating to tree care.

#### **SECTION 4: REQUIRED MITIGATION FOR ALLOWED TREE REMOVAL**

1. *First paragraph:* The first sentence reads "Mitigation is required for each exceptional tree that is not hazardous and is removed in association with development in all zones." Is mitigation *not* required for trees that are *not* removed in association with development? Mitigation of removed hazard trees ought to be required, too, if they were exceptional before they became hazardous. We understand that the intent here may be to not burden property owners with the replacement of a tree which was removed through no fault of their own. If the city had a fee-in lieu payment mechanism for trees which developers were unable to retain or replace on site, money from those funds could be used to assist property owners with tree replacement costs in an equitable way. Seattle Audubon recommends revising this sentence to read, "Mitigation is required for each exceptional tree or hazard tree removed in all zones."

2. *First paragraph:* Last sentence ends "...preference for off-site replacement shall be on public property." This preference may prove restrictive and unhelpful as the city works to meet its race and social justice goals under Seattle's Equity and Environment Initiative. Seattle Audubon suggests: "...preference for off-site replacement shall be on public or private property, where desired by the property owner, in order to meet the City's goals and objectives of racial and social justice under Seattle's Equity and Environment Initiative."
3. *Third paragraph:* Need to add a timing requirement. By what time is the applicant required to replace the removed tree? What if the tree is removed at the start of summer? Best practice in Seattle is to plant in the autumn. Seattle Audubon suggests, "All replacement trees shall be planted in October through December and no later than 12 months after removal. The applicant shall prepare and, if necessary, amend the existing soil conditions..."
4. *Fourth paragraph:* To aid the survival of replacement trees, add that replacement trees shall be watered during summer months for the first 5 years. Our suggestion: "The property owner of the site shall water replacement trees from June through September and ensure that the trees remain healthy for at least five years after planting. The property owner shall allow inspection by the City."
5. *Table 1. Size and Thresholds for Selected Specimen Exceptional Trees:* A single column header spans two columns and is not easily understood. We suggest revising to two headings and adding notation to indicate native species as below:

Tree Species	DSH at which Species Becomes Exceptional
ALDER, Sitka – <i>Alnus sinuate</i>	6"
APPLE, Orchard (Common) – <i>Malus sp.</i>	20"
ASH, European – <i>Fraxinus excelsior</i>	22"
ASPEN, Quaking – <i>Populus tremuloides*</i>	12"
...	...

\*Native to Washington state.

6. *Table 1. Record for WILLOW species: All specific epithets, subspecies, and variety names should be lower case, and species varieties should be indicated by "var." instead of "ver." The entry should read:*

WILLOW (All native species) – <i>Salix</i> sp. ( <i>geyeriana</i> var. <i>meleina</i> , <i>eriocephala</i> ssp. <i>mackenzieana</i> , <i>hookeriana</i> , <i>piperi</i> , <i>scouleriana</i> , <i>sitchensis</i> )*	8"
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#### SECTION 5: USE OF THIS RULE IN THE APPLICATION OF SEPA

SEPA protects trees and other vegetation beyond our biggest trees. SMC 25.05.675 N.2.a. states "...A high priority shall be given to the preservation and protection of special habitat types. Special habitat types include, but are not limited to, wetlands and associated areas (such as upland nesting areas), and spawning, feeding or nesting sites."

Over 100 bird species use Seattle's trees and dozens of species nest in them. Their nesting choices can seem quixotic—they do not just use exceptional trees. Age and species diversity in our urban forest is critical for protecting the abundance and diversity of birds and other wildlife in Seattle. This section seems to imply that SEPA and mitigating measures might only apply to exceptional trees that are rare, uncommon or unique, form a wildlife travelway, or if they are of substantial, aesthetic, educational, ecological, or economic value. That is not the case. SEPA protections are much broader. This section should adequately communicate as much.

#### SECTION 6: TREE CARE PROVIDER ACKNOWLEDGEMENT

1. The proposed tree care provider acknowledgement would be improved by more closely mirroring SDOT's Tree Service Provider Registration. Consistency between departments will reduce confusion for professionals. Please change the title of the form to "SDCI Tree Service Provider Registration."
2. Please require the following documentation to be included with the registration:
  - Washington State Contractor License (L&I)
  - City of Seattle Business License
  - Certificate of Insurance
  - Street Use Annual Vehicle Permit (if applicable)
3. Registration should not be automatically renewed each year. Please require annual registration to ensure that tree service provider information remains up-to-date and that tree professionals regularly review the code for any updated language or regulations.

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4. More than three citations during a one-year period before a tree service provider is removed from the City's list to do business in Seattle is overly generous. How many warnings are needed? Please reduce the number of citations per one-year period to no more than two.

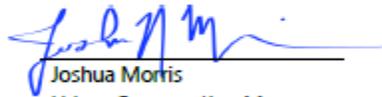
Thank you again for your work to update the Director's Rule. We urge you to strengthen, adopt and implement the Rule without delay.

Seattle Audubon notes again that the City needs an updated tree protection ordinance to conserve its urban forest. We ask you to continue working with the Urban Forestry Commission and to introduce legislation for City Council's consideration this year.

Respectfully,



Deb Heiden, Interim Chair  
Conservation Committee  
Seattle Audubon



Joshua Morris  
Urban Conservation Manager  
Seattle Audubon

Cc: Mayor Jenny Durkan; Jenny.Durkan@seattle.gov  
Seattle City Council; Council@seattle.gov  
Sandra Pinto de Bader; Sandra.Pinto\_de\_Bader@seattle.gov

8050 35<sup>th</sup> Ave NE, Seattle, WA 98115 / (206) 523-4483 / [www.seattleaudubon.org](http://www.seattleaudubon.org)

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**From:** Heather Pihl <[info@email.actionnetwork.org](mailto:info@email.actionnetwork.org)>  
**Sent:** Friday, August 14, 2020 7:31 PM  
**To:** Pinto de Bader, Sandra <[Sandra.Pinto\\_de\\_Bader@Seattle.gov](mailto:Sandra.Pinto_de_Bader@Seattle.gov)>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees

The following changes to the draft Director's Rule are needed:

- Change Subject Title to remove words "land division" and replace with "Development"
- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."
- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as "a group of 3 or more significant trees with overlapping or touching crowns." Include street trees in groves.
- Add "Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to

maintain a diversity of tree species and ages.”

- Add “All replacement trees regardless of size are protected trees and can’t be removed.”
- SECTION 2. Change the heading to “TREE PROTECTION”. Remove references to “Exceptional Trees” only and change to “Trees”. e.g., change “Exceptional Tree Protection Areas” to “Tree Protection Areas”.
- SECTION 4. Add “The Director shall have the authority to allow replacement trees on both public and private property to meet the goals and objectives of race and social justice under Seattle’s Equity and Environment Initiative.”
- Under SMC 25.11.090 the Director has the authority to require “one or more trees” to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.
- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats and need to be considered at the beginning of the development process. The language of this SEPA code section should be included in the Director’s Rule to be certain that the code is complied with.
- SECTION 6. SDCI should adopt SDOT’s registration process and requirements to assist Tree Care Providers in complying with city code and regulations. Reduce the number of citations that will remove a Tree Care Provider from being registered with the city to no more than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor’s license to ensure they have workers’ compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

Heather Pihl

[sunflowerandblueskies@gmail.com](mailto:sunflowerandblueskies@gmail.com)

124 Warren Ave N.  
Seattle, Washington 98109

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**From:** Diedra Roesijadi <diedra@live.com>  
**Sent:** Friday, August 14, 2020 7:34 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

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than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor's license to ensure they have workers' compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

Diedra Roesijadi

[diedra@live.com](mailto:diedra@live.com)

520 N 77th Street

Seattle, Washington 98103

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**From:** Kathryn Keller <ktkeller@earthlink.net>

**Sent:** Friday, August 14, 2020 7:34 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

Kathryn Keller

[ktkeller@earthlink.net](mailto:ktkeller@earthlink.net)

1821 27th Ave

Seattle, Washington 98122

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**From:** Janine Michelsons <mossy@riseup.net>

**Sent:** Friday, August 14, 2020 7:34 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Thank you for adopting with amendments, Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Thank you for taking historic action influence the air and quality of life in Seattle forever. Remember how thankful we are for the Olmsted Plan? Parks and trees along the water? YES! You can have future generations thanking you when you protect our Seattle trees now.

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- Under SMC 25.11.090 the Director has the authority to require “one or more trees” to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.
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- SECTION 6. SDCI should adopt SDOT’s registration process and requirements to assist Tree Care Providers in complying with city code and regulations. Reduce the number of citations that will remove a Tree Care Provider from being registered with the city to no more than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor’s license to ensure they have workers’ compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for taking this historic opportunity to protect what's left of urban forest.

Janine Michelsons  
7103 39th Ave SW  
Seattle, WA 98136-1909

Born and raised in Seattle and hoping Seattle will stay a green place to live!

Janine Michelsons  
[mossy@riseup.net](mailto:mossy@riseup.net)  
7103 39th Ave SW  
Seattle, Washington 98136-1909

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**From:** Julie Weisbach <jmweisbach@comcast.net>  
**Sent:** Friday, August 14, 2020 7:42 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of

Transportation already requires

- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees

The following changes to the draft Director's Rule are needed:

- Change Subject Title to remove words "land division" and replace with "Development"
- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."
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Thank you for protecting our urban forest.

Julie Weisbach

[jmweisbach@comcast.net](mailto:jmweisbach@comcast.net)

2241 B Fairview AV E

Seattle, Washington 98102

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**From:** Rachel LaRoche <info@email.actionnetwork.org>  
**Sent:** Friday, August 14, 2020 7:53 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Save our Urban Forests!!!! Nothing could be more important!!!

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division,

including tree service provider requirements.

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Thank you for protecting our urban forest.

PLEASE! Kind Regards and Stay Well, Rachel E. LaRoche

Rachel LaRoche

[rachel.laroche@gmail.com](mailto:rachel.laroche@gmail.com)

10011 21st Ave NE

Seattle, Washington 98125

**From:** Bonnie Thompson Norman <info@email.actionnetwork.org>  
**Sent:** Friday, August 14, 2020 7:55 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

Really, it should be obvious that we need trees more than ever!

Bonnie Thompson Norman

[lnkdArt@gmail.com](mailto:lnkdArt@gmail.com)

NE 92nd Street

Seattle, Washington 98115

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From: kirby-bragg@everyactioncustom.com <kirby-bragg@everyactioncustom.com>

Sent: Friday, August 14, 2020 7:57 PM

To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

Subject: Trees need time to grow up!

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thirty years ago, my wife and I started planting 50 trees in our yard on a city lot. The Taxus brevifolia is only 6 ft tall after all these years. Other trees have 8-12 inch diameters and the birds have really moved in during the last 2 years. Our little urban forest is still maturing! New landscaping can be great for some gardens and appeal to the aesthetic of some people, but do not provide full environmental benefits for at least 25 years.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property. Our little urban forest

The proposed rule can be strengthened in the following ways:

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCL is no longer concerned about the fate of the smaller, non-exceptional trees.

- Protect red alders, black cottonwoods, and bitter cherries. These native trees provide important resources to birds and other wildlife and contribute to our sense of place in Seattle. Following the "right tree, right place" philosophy, these native trees can safely thrive and should be protected like other species. With global warming, we can't afford to lose one single tree!
- Expand the definition of tree groves to stands of six or more trees at least six inches in diameter, including street trees. Tree groves provide important habitat for birds and are becoming less common outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove.
- Require public notice postings on development site and online for removal of Exceptional trees, even when hazardous, to ensure community members know when and where legal tree removal is occurring.
- Require replacement for trees removed from groves and removed hazard trees.
- Align SDCI's proposed Tree Care Provider Acknowledgement with SDOT's Tree Service Provider Registration. Do not automatically renew this form annually. It should be updated each year. Reduce the number of infractions tree service providers can incur in a year before they are removed from the City's list to do business from more than three infractions to more than two infractions.
- Section 4: Preference for planting off-site replacement trees on public property is restrictive. The Director should be able to allow replacement trees not only on public property, but also on private property, where desired by the property owner, in order to meet the City's goals and objectives of race and social justice under Seattle's Equity and Environment Initiative.

The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
 Robert Kirby  
 6235 NE Princeton Way Seattle, WA 98115-7731 kirby-bragg@comcast.net

---

**From:** Susan Picquelle <info@email.actionnetwork.org>

**Sent:** Friday, August 14, 2020 7:59 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

Susan Picquelle

[susan.picquelle@hotmail.com](mailto:susan.picquelle@hotmail.com)

11924 Lakeside Ave NE

Seattle, Washington 98125-5951

**From:** Jan Napolitano <info@email.actionnetwork.org>  
**Sent:** Friday, August 14, 2020 7:59 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

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Thank you for protecting our urban forest.

Jan Napolitano

[ulalume58@gmail.com](mailto:ulalume58@gmail.com)

2340 48th ave sw apt 1

Seattle , Washington 98116

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**From:** Nancy Peacock <info@email.actionnetwork.org>  
**Sent:** Friday, August 14, 2020 8:01 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

Nancy Peacock

[nbpeacock@gmail.com](mailto:nbpeacock@gmail.com)

2504 NE 117th St

Seattle, Washington 98125-5304

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From: polly\_freeman@everyactioncustom.com <polly\_freeman@everyactioncustom.com>  
Sent: Friday, August 14, 2020 8:12 PM  
To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

Protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees

greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCI is no longer concerned about the fate of the smaller, non-exceptional trees.

- Protect red alders, black cottonwoods, and bitter cherries. These native trees provide important resources to birds and other wildlife and contribute to our sense of place in Seattle. Following the "right tree, right place" philosophy, these native trees can safely thrive and should be protected like other species.
- Expand the definition of tree groves to stands of six or more trees at least six inches in diameter, including street trees. Tree groves provide important habitat for birds and are becoming less common outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove.
- Require public notice postings on development site and online for removal of Exceptional trees, even when hazardous, to ensure community members know when and where legal tree removal is occurring.
- Require replacement for trees removed from groves and removed hazard trees.
- Align SDCI's proposed Tree Care Provider Acknowledgement with SDOT's Tree Service Provider Registration. Do not automatically renew this form annually. It should be updated each year. Reduce the number of infractions tree service providers can incur in a year before they are removed from the City's list to do business from more than three infractions to more than two infractions. Providers should not be able to flout the rules and keep doing so.
- Section 4: Preference for planting off-site replacement trees on public property is restrictive. The Director should be able to allow replacement trees not only on public property, but also on private property, where desired by the property owner, in order to meet the City's goals and objectives of race and social justice under Seattle's Equity and Environment Initiative.

The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
Polly Freeman  
201 NW 60th St Seattle, WA 98107-2036  
polly\_freeman@msn.com

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**From:** Nancy Shimeall <info@email.actionnetwork.org>

**Sent:** Friday, August 14, 2020 8:20 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

I urge you to please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now in adopting this updated Director's Rule with the amendments proposed below. Increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue. Considering all we know about the city's emissions, air quality, and heat zones, trees take on an essential role in our health.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees

The following changes to the draft Director's Rule are needed:

- Change Subject Title to remove words "land division" and replace with "Development"
- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."
- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as "a group of 3 or more significant trees with overlapping or touching crowns." Include street trees in groves.
- Add "Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to

maintain a diversity of tree species and ages.”

- Add “All replacement trees regardless of size are protected trees and can’t be removed.”
- SECTION 2. Change the heading to “TREE PROTECTION”. Remove references to “Exceptional Trees” only and change to “Trees”. e.g., change “Exceptional Tree Protection Areas” to “Tree Protection Areas”.
- SECTION 4. Add “The Director shall have the authority to allow replacement trees on both public and private property to meet the goals and objectives of race and social justice under Seattle’s Equity and Environment Initiative.”
- Under SMC 25.11.090 the Director has the authority to require “one or more trees” to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.
- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats and need to be considered at the beginning of the development process. The language of this SEPA code section should be included in the Director’s Rule to be certain that the code is complied with.
- SECTION 6. SDCI should adopt SDOT’s registration process and requirements to assist Tree Care Providers in complying with city code and regulations. Reduce the number of citations that will remove a Tree Care Provider from being registered with the city to no more than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor’s license to ensure they have workers’ compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

Nancy Shimeall

[nshimeall@gmail.com](mailto:nshimeall@gmail.com)

1525 nw 57th St NW  
Seattle, Washington 98107

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**From:** THOMAS DAVIES <info@email.actionnetwork.org>  
**Sent:** Friday, August 14, 2020 8:25 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

THOMAS DAVIES

[Tomdavies44@gmail.com](mailto:Tomdavies44@gmail.com)

3017 NE 90th St

Seattle, Washington 98115-3533

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**From:** Catherine Berchok <info@email.actionnetwork.org>  
**Sent:** Friday, August 14, 2020 8:26 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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Thank you for protecting our urban forest.

Catherine Berchok

[cberchok@yahoo.com](mailto:cberchok@yahoo.com)

10040 36th Ave NE

Seattle, Washington 98125

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**From:** Bonita Marques <b@marques42.org>

**Sent:** Friday, August 14, 2020 8:38 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

Bonita Marques

[b@marques42.org](mailto:b@marques42.org)

701 N 61st St.

Seattle, Washington 98103

**From:** carol ellis <info@email.actionnetwork.org>  
**Sent:** Friday, August 14, 2020 8:37 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

carol ellis

[carolynellis99@yahoo.com](mailto:carolynellis99@yahoo.com)

4023 46 th Ave SW #1

Seattle, Washington 98116

---

**From:** VICKI MORGANSTEVENSON <info@email.actionnetwork.org>

**Sent:** Friday, August 14, 2020 8:40 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Protecting our tree canopy is of vital and urgent importance. Especially native trees, which are necessary for most native birds and insects. When they are gone, so goes our ecosystem. We have no time to waste in bringing back and protecting the environmental health of a city that has been going down a destructive path for far too long. We need this, now.

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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VICKI MORGANSTEVENSON

[vickimorgan01@yahoo.com](mailto:vickimorgan01@yahoo.com)

2412 2ND AVE W

SEATTLE, Washington 98119

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**From:** Mark Banks <info@email.actionnetwork.org>  
**Sent:** Friday, August 14, 2020 8:59 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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- Under SMC 25.11.090 the Director has the authority to require “one or more trees” to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.
- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats and need to be considered at the beginning of the development process. The language of this SEPA code section should be included in the Director’s Rule to be certain that the code is complied with.
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Thank you for protecting our urban forest.

Mark Banks

Mark Banks

[markbanks@me.com](mailto:markbanks@me.com)

26201 NE 40th St  
Redmond, Washington 98053

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**From:** Jourdan Keith <info@email.actionnetwork.org>  
**Sent:** Friday, August 14, 2020 9:05 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees

The following changes to the draft Director's Rule are needed:

- Change Subject Title to remove words “land division” and replace with “Development”
- PURPOSE AND BACKGROUND. add “SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city.”
- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as “a group of 3 or more significant trees with overlapping or touching crowns.” Include street trees in groves.
- Add “Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages.”
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Thank you for protecting our urban forest.

Jourdan Keith

[jourdankeith@yahoo.com](mailto:jourdankeith@yahoo.com)

1744 S Hanford St

Seattle, Washington 98144

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**From:** Carol Long <info@email.actionnetwork.org>  
**Sent:** Friday, August 14, 2020 9:13 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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Thank you for protecting our urban forest.

Carol Long

[carollgetalong@aol.com](mailto:carollgetalong@aol.com)

3059 38th Ave SW

Seattle, Washington 98126

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**From:** Sonia Popadycz <info@email.actionnetwork.org>  
**Sent:** Friday, August 14, 2020 9:24 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Seattle needs MATURE trees: they provide shade and cooling, absorb CO<sub>2</sub>, provide habitat for birds, and enhance the beauty of our neighborhoods. A livable city needs to consider more than just the profit motive of real estate developers.

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages.”

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Thank you for protecting our urban forest.

Sonia Popadycz

[ofromage@gmail.com](mailto:ofromage@gmail.com)

7412B Latona Ave NE  
Seattle, Washington 98115

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**From:** Barbara Phinney <info@email.actionnetwork.org>  
**Sent:** Friday, August 14, 2020 9:34 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

I live in District 5, the Broadview/ Bitter Lake neighborhood. In the last 20+ years we have lost a catastrophic number of huge trees, most on private property. The loss of tree canopy is a big concern. This has happened at the same time as climate crisis, extreme weather and warming, flooding, etc. Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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Thank you for protecting our urban forest.

Barbara Phinney

[bphinney@mac.com](mailto:bphinney@mac.com)

12248 Phinney Ave N

Seattle, Washington 98133

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**From:** Susan Montacute <info@email.actionnetwork.org>

**Sent:** Friday, August 14, 2020 9:44 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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Thank you for protecting our urban forest.

Sincerely, Susan Montacute  
4325 Jill Pl S, Seattle 98108

Susan Montacute  
[montacutesm@gmail.com](mailto:montacutesm@gmail.com)  
4325 Jill Pl S  
Seattle, Washington 98108

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**From:** Lisa Coyne <info@email.actionnetwork.org>  
**Sent:** Friday, August 14, 2020 9:48 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

Lisa Coyne

[ls\\_coyne@yahoo.com](mailto:ls_coyne@yahoo.com)

11512 28th ave NE  
Seattle, Washington 98125

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**From:** Melody Winkle <info@email.actionnetwork.org>  
**Sent:** Friday, August 14, 2020 9:53 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

Melody Winkle

[mwinkle@gmail.com](mailto:mwinkle@gmail.com)

2518 NE 92nd St

Seattle, Washington 98115

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**From:** Marianna Clark <info@email.actionnetwork.org>

**Sent:** Friday, August 14, 2020 10:02 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Thank you for protecting our urban forest.

Marianna Clark

Marianna Clark

[mclarksea@yahoo.com](mailto:mclarksea@yahoo.com)

2116 2nd Ave West  
Seattle, Washington 98119

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**From:** Erica Grivas <info@email.actionnetwork.org>  
**Sent:** Friday, August 14, 2020 10:05 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees

The following changes to the draft Director's Rule are needed:

- Change Subject Title to remove words “land division” and replace with “Development”
- PURPOSE AND BACKGROUND. add “SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city.”
- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as “a group of 3 or more significant trees with overlapping or touching crowns.” Include street trees in groves.
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Thank you for protecting our urban forest.

Seattle's tree canopy is needed now more than ever with climate change, increased pollution and population density. We don't have time to regrow these old trees!

Erica Grivas

[Ebgrivas@yahoo.com](mailto:Ebgrivas@yahoo.com)

2324 N 56 St

Seattle, Washington 98103

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**From:** Celine Pardo <info@email.actionnetwork.org>  
**Sent:** Friday, August 14, 2020 10:14 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

Celine Pardo

[celine\\_pardo@hotmail.com](mailto:celine_pardo@hotmail.com)

5705 Phinney Ave N

Seattle, Washington 98103

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**From:** Marie White <info@email.actionnetwork.org>  
**Sent:** Friday, August 14, 2020 10:19 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

Marie Anna White

Marie White

[annasweetsmiles@gmail.com](mailto:annasweetsmiles@gmail.com)

626 4th ave W, #104  
SEATTLE, Santarém 98119

---

**From:** Karla Agapay <info@email.actionnetwork.org>  
**Sent:** Friday, August 14, 2020 10:23 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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Thank you for protecting our urban forest.

Karla Agapay

[agapay.karla@yahoo.com](mailto:agapay.karla@yahoo.com)

616 4th Ave W , Unit 102

Seattle, Washington 98119

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**From:** Eileen Heideman <info@email.actionnetwork.org>

**Sent:** Friday, August 14, 2020 10:31 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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Thank you for protecting our urban forest.

Eileen Heideman

[eheideman@gmail.com](mailto:eheideman@gmail.com)

7560 1st Ave NE

Seattle , Washington 98115

---

**From:** David Moehring <dmoehring@consultant.com>  
**Sent:** Friday, August 14, 2020 10:35 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

What Merit does the Master Builders have in further delaying measures needed to retain our large trees that combat local heat islands?

Please review the report prepared 3 years ago by Seattle staff Faith Ramos:

<http://www.seattle.gov/Documents/Departments/UrbanForestryCommission/Resources/TreeResearchProjectPhaseIIFinalReport033117.pdf>

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Thank you for protecting our urban forest!

David Moehring  
[dmoehring@consultant.com](mailto:dmoehring@consultant.com)  
3444B 23rd Ave W  
Seattle, Washington 98199

---

**From:** Kelly Johnson <info@email.actionnetwork.org>  
**Sent:** Friday, August 14, 2020 10:43 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

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Tree Care Providers in complying with city code and regulations. Reduce the number of citations that will remove a Tree Care Provider from being registered with the city to no more than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor's license to ensure they have workers' compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

Kelly Johnson

[soundkj@hotmail.com](mailto:soundkj@hotmail.com)

8903 20th Ave NE

Seattle , Washington 98115

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**From:** Paige Heggie <info@email.actionnetwork.org>  
**Sent:** Friday, August 14, 2020 11:35 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees

The following changes to the draft Director’s Rule are needed:

- Change Subject Title to remove words “land division” and replace with “Development”
- PURPOSE AND BACKGROUND. add “SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city.”
- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as “a group of 3 or more significant trees with overlapping or touching crowns.” Include street trees in groves.
- Add “Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages.”
- Add “All replacement trees regardless of size are protected trees and can’t be removed.”
- SECTION 2. Change the heading to “TREE PROTECTION”. Remove references to “Exceptional Trees” only and change to “Trees”. e.g., change “Exceptional Tree Protection Areas” to “Tree Protection Areas”.
- SECTION 4. Add “The Director shall have the authority to allow replacement trees on both public and private property to meet the goals and objectives of race and social justice under Seattle’s Equity and Environment Initiative.”
- Under SMC 25.11.090 the Director has the authority to require “one or more trees” to be planted as replacement trees for removed exceptional trees during development. The number

of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.

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Thank you for protecting our urban forest.

Paige Heggie

[paigeheggie@hotmail.com](mailto:paigeheggie@hotmail.com)

4207 Phinney Avenue North, Apt 205

Seattle, Washington 98103

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**From:** Lisa Branz <info@email.actionnetwork.org>  
**Sent:** Saturday, August 15, 2020 12:42 AM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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Thank you for protecting our urban forest.

Lisa Branz

[brali7@aol.com](mailto:brali7@aol.com)

4610 34th Ave w  
Seattle, Kasai-Occidental Province 98199

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**From:** Jennifer Nelson <JennNel@comcast.net>  
**Sent:** Saturday, August 15, 2020 12:47 AM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

Jennifer Nelson

[JennNel@comcast.net](mailto:JennNel@comcast.net)

12216 North Park Ave N

Seattle, Washington 98133-8027

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**From:** Rebecca Watson <info@email.actionnetwork.org>  
**Sent:** Saturday, August 15, 2020 5:57 AM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

Rebecca Watson

[rebecca.watson@gmail.com](mailto:rebecca.watson@gmail.com)

3932 SW Elmgrove

Seattle , Washington 98136

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From: jishisaka@everyactioncustom.com <jishisaka@everyactioncustom.com>  
Sent: Saturday, August 15, 2020 6:13 AM  
To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCI is no longer concerned about the fate of the smaller, non-exceptional trees.
- Protect red alders, black cottonwoods, and bitter cherries. These native trees provide important resources to birds and other wildlife and contribute to our sense of place in Seattle. Following the "right tree, right place" philosophy, these native trees can safely thrive and should be protected like other species.
- Expand the definition of tree groves to stands of six or more trees at least six inches in diameter, including street trees. Tree groves provide important habitat for birds and are becoming less common outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove.
- Require public notice postings on development site and online for removal of Exceptional trees, even when hazardous, to ensure community members know when and where legal tree removal is occurring.
- Require replacement for trees removed from groves and removed hazard trees. This rule should extend to private homes, not just to lots being developed for future homes.
- Align SDCI's proposed Tree Care Provider Acknowledgement with SDOT's Tree Service Provider Registration. Do not automatically renew this form annually. It should be updated each year. Reduce the number of infractions tree service providers can incur in a year before they are removed from the City's list to do business from more than three infractions to more than two infractions.
- Section 4: Preference for planting off-site replacement trees on public property is restrictive. The Director should be able to allow replacement trees not only on public property, but also on private property, where desired by the property owner, in order to meet the City's goals and objectives of race and social justice under Seattle's Equity and Environment Initiative.

The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
Joanne Ishisaka  
4240 NE 92nd St Seattle, WA 98115-3835  
jishisaka@gmail.com

---

**From:** Stephen Tan <stan@cascadialaw.com>  
**Sent:** Saturday, August 15, 2020 6:46 AM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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- Add “Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages.”
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Thank you for protecting our urban forest.

Stephen Tan

[stan@cascadialaw.com](mailto:stan@cascadialaw.com)

2442 5th Ave. West

Seattle, Washington 98119

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**From:** Daniel Smith <info@email.actionnetwork.org>  
**Sent:** Saturday, August 15, 2020 6:51 AM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

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Thank you for protecting our urban forest.

Daniel Smith

Daniel Smith

[command\\_z\\_design@hotmail.com](mailto:command_z_design@hotmail.com)

1123 25th Ave

Seattle, Washington 98122

---

**From:** Christopher Dawe <info@email.actionnetwork.org>

**Sent:** Saturday, August 15, 2020 6:56 AM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as "a group of 3 or more significant trees with overlapping or touching crowns." Include street trees in groves.
- Add "Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages."
- Add "All replacement trees regardless of size are protected trees and can't be removed."
- SECTION 2. Change the heading to "TREE PROTECTION". Remove references to "Exceptional Trees" only and change to "Trees". e.g., change "Exceptional Tree Protection Areas" to "Tree Protection Areas".
- SECTION 4. Add "The Director shall have the authority to allow replacement trees on both public and private property to meet the goals and objectives of race and social justice under Seattle's Equity and Environment Initiative."
- Under SMC 25.11.090 the Director has the authority to require "one or more trees" to be

planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.

- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats and need to be considered at the beginning of the development process. The language of this SEPA code section should be included in the Director's Rule to be certain that the code is complied with.
- SECTION 6. SDCI should adopt SDOT's registration process and requirements to assist Tree Care Providers in complying with city code and regulations. Reduce the number of citations that will remove a Tree Care Provider from being registered with the city to no more than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor's license to ensure they have workers' compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

Christopher Dawe

[dawecj@gmail.com](mailto:dawecj@gmail.com)

764 n 75th street

Seattle, Washington 98103

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**From:** BJ Patch <info@email.actionnetwork.org>

**Sent:** Saturday, August 15, 2020 6:57 AM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees

The following changes to the draft Director's Rule are needed:

- Change Subject Title to remove words "land division" and replace with "Development"
- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."
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- Add "Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to

maintain a diversity of tree species and ages.”

- Add “All replacement trees regardless of size are protected trees and can’t be removed.”
- SECTION 2. Change the heading to “TREE PROTECTION”. Remove references to “Exceptional Trees” only and change to “Trees”. e.g., change “Exceptional Tree Protection Areas” to “Tree Protection Areas”.
- SECTION 4. Add “The Director shall have the authority to allow replacement trees on both public and private property to meet the goals and objectives of race and social justice under Seattle’s Equity and Environment Initiative.”
- Under SMC 25.11.090 the Director has the authority to require “one or more trees” to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.
- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats and need to be considered at the beginning of the development process. The language of this SEPA code section should be included in the Director’s Rule to be certain that the code is complied with.
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Thank you for protecting our urban forest.

BJ Patch

[bjpatch@hotmail.com](mailto:bjpatch@hotmail.com)

526 1st Ave So 520  
Seattle , Washington 98104

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**From:** Audrey Meade <info@email.actionnetwork.org>  
**Sent:** Saturday, August 15, 2020 7:10 AM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees

The following changes to the draft Director's Rule are needed:

- Change Subject Title to remove words “land division” and replace with “Development”
- PURPOSE AND BACKGROUND. add “SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city.”
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- Add “Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages.”
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than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor's license to ensure they have workers' compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

Audrey Meade

[audreebee@gmail.com](mailto:audreebee@gmail.com)

4126 42nd Ave S

Seattle, Washington 98118

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**From:** Carolyn Sperry <info@email.actionnetwork.org>  
**Sent:** Saturday, August 15, 2020 7:21 AM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches

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- Tightening tree removal requirements for exceptional trees as hazard trees

The following changes to the draft Director’s Rule are needed:

- Change Subject Title to remove words “land division” and replace with “Development”
- PURPOSE AND BACKGROUND. add “SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city.”
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- SECTION 2. Change the heading to “TREE PROTECTION”. Remove references to “Exceptional Trees” only and change to “Trees”. e.g., change “Exceptional Tree Protection Areas” to “Tree Protection Areas”.
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the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.

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- SECTION 6. SDCI should adopt SDOT's registration process and requirements to assist Tree Care Providers in complying with city code and regulations. Reduce the number of citations that will remove a Tree Care Provider from being registered with the city to no more than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor's license to ensure they have workers' compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

While this letter emphasizes matters that are technical and may seem to some people quite dull, the protection and beauty and contributions to keeping the air in our city clean and fresher, and the protection of pedestrians and drivers, sidewalks and roads, birds, insects, and squirrels by nature's gift of tree canopies provides too often overlooked or taken-for-granted amenities to us city dwellers. PLEASE protect Seattle's trees and Seattle's inhabitants. Thank you. This is not a "sexy" issue, but it is a critical one.

Carolyn Sperry

[cwsperry@hotmail.com](mailto:cwsperry@hotmail.com)

1416. E. Aloha St.

Seattle, Washington 98112

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**From:** Rebecca Reid <info@email.actionnetwork.org>

**Sent:** Saturday, August 15, 2020 7:31 AM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

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The following changes to the draft Director's Rule are needed:

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overlapping or touching crowns.” Include street trees in groves.

- Add “Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages.”
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Thank you for protecting our urban forest.

Rebecca Reid

[beckruthreid@gmail.com](mailto:beckruthreid@gmail.com)

12763 39th Ave. NE

Seattle, Washington 98125

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From: carolhartung@everyactioncustom.com <carolhartung@everyactioncustom.com>

Sent: Saturday, August 15, 2020 7:37 AM

To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCI is no longer concerned about the fate of the smaller, non-exceptional trees.
- Protect red alders, black cottonwoods, and bitter cherries. These native trees provide important resources to birds and other wildlife and contribute to our sense of place in Seattle. Following the "right tree, right place" philosophy, these native trees can safely thrive and should be protected like other species.
- Expand the definition of tree groves to stands of six or more trees at least six inches in diameter, including street trees. Tree groves provide important habitat for birds and are becoming less common outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove.
- Require public notice postings on development site and online for removal of Exceptional trees, even when hazardous, to ensure community members know when and where legal tree removal is occurring.

- Require replacement for trees removed from groves and removed hazard trees.
- Align SDCI's proposed Tree Care Provider Acknowledgement with SDOT's Tree Service Provider Registration. Do not automatically renew this form annually. It should be updated each year. Reduce the number of infractions tree service providers can incur in a year before they are removed from the City's list to do business from more than three infractions to more than two infractions.
- Section 4: Preference for planting off-site replacement trees on public property is restrictive. The Director should be able to allow replacement trees not only on public property, but also on private property, where desired by the property owner, in order to meet the City's goals and objectives of race and social justice under Seattle's Equity and Environment Initiative.

The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
 Carol Hartung  
 5818 NE 70th St Apt A109 Seattle, WA 98115-6340 carolhartung@gmail.com

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From: imungz@everyactioncustom.com <imungz@everyactioncustom.com>  
 Sent: Saturday, August 15, 2020 7:37 AM  
 To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
 Subject: Don't cut off the limbs of Seattle

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

Leave us the trees!! BIPOC and wildlife are depending on you to do the right thing.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

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Leave us the trees!! BIPOC and wildlife are depending on you to do the right thing.

Sincerely,  
Irene Munger  
3701 S Hudson St Seattle, WA 98118-2162 imungz@gmail.com

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**From:** Annette Ramsay <info@email.actionnetwork.org>

**Sent:** Saturday, August 15, 2020 7:38 AM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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- Tightening tree removal requirements for exceptional trees as hazard trees

The following changes to the draft Director's Rule are needed:

- Change Subject Title to remove words "land division" and replace with "Development"
- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."
- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as "a group of 3 or more significant trees with overlapping or touching crowns." Include street trees in groves.
- Add "Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages."
- Add "All replacement trees regardless of size are protected trees and can't be removed."
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- Under SMC 25.11.090 the Director has the authority to require "one or more trees" to be

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Thank you for protecting our urban forest.

Annette Ramsay

[Ramclan01@gmail.com](mailto:Ramclan01@gmail.com)

11555 6th PL NE

Seattle, Washington 98125

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From: sarahwelch@everyactioncustom.com <sarahwelch@everyactioncustom.com>

Sent: Saturday, August 15, 2020 7:40 AM

To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

Subject: Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Green Seattle Partnership and Audubon,, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city. Furthermore, protecting trees is essential for cleaner air and to curb global warming.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

- Emphasize the existing code language to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCI is no longer concerned about the fate of the smaller, non-exceptional trees.
- Protect red alders, black cottonwoods, and bitter cherries in particular. These native trees provide important resources to birds and other wildlife and contribute to our sense of place in Seattle. Following the "right tree, right place" philosophy, these native trees can safely thrive and should be protected like other species.
- Expand the definition of tree groves to stands of six or more trees at least six inches in diameter, including street trees. Tree groves provide important habitat for birds and are becoming less common outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove.
- Require public notice postings on development site and online for removal of Exceptional trees, even when hazardous, to ensure community members know when and where legal tree removal is occurring.
- Require replacement for trees removed from groves and removed hazard trees.
- Align SDCI's proposed Tree Care Provider Acknowledgement with SDOT's Tree Service Provider Registration. Do not automatically renew this form annually. It should be updated each year. Reduce the number of infractions tree service providers can incur in a year before they are removed from the City's list to do business from more than three infractions to more than two infractions.
- Section 4: Preference for planting off-site replacement trees on public property is restrictive. The Director should be able to allow replacement trees not only on public property, but also on private property, where desired by the property owner, in order to meet the City's goals and objectives of race and social justice under Seattle's Equity and Environment Initiative.

The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Be real--we're not going to add to our greenscape! Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

I'm also an advocate for environmental justice. Especially in SE Seattle, we need to preserve the urban forests and tree canopy we have. We can have environmental justice and also add to the stock of

housing if we do it with care. Do not pit one against the other! It's unfair to our BIPOC communities. These amendments are one path to justice.

Sincerely,  
Sarah Welch  
3704 Cheasty Blvd S Seattle, WA 98144-6811 sarahwelch@comcast.net

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**From:** Colleen Weinstein <colleen@dyggin.com>

**Sent:** Saturday, August 15, 2020 7:58 AM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

I am saddened that our city has taken so long to reach this stage in renewed tree protections. We cannot afford to delay any longer. Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements. Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees

The following changes to the draft Director's Rule are needed:

- Change Subject Title to remove words "land division" and replace with "Development"

- PURPOSE AND BACKGROUND. add “SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city.”
- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as “a group of 3 or more significant trees with overlapping or touching crowns.” Include street trees in groves.
- Add “Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages.”
- Add “All replacement trees regardless of size are protected trees and can’t be removed.”
- SECTION 2. Change the heading to “TREE PROTECTION”. Remove references to “Exceptional Trees” only and change to “Trees”. e.g., change “Exceptional Tree Protection Areas” to “Tree Protection Areas”.
- SECTION 4. Add “The Director shall have the authority to allow replacement trees on both public and private property to meet the goals and objectives of race and social justice under Seattle’s Equity and Environment Initiative.”
- Under SMC 25.11.090 the Director has the authority to require “one or more trees” to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.
- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats and need to be considered at the beginning of the development process. The language of this SEPA code section should be included in the Director’s Rule to be certain that the code is complied with.
- SECTION 6. SDCI should adopt SDOT’s registration process and requirements to assist Tree Care Providers in complying with city code and regulations. Reduce the number of citations that will remove a Tree Care Provider from being registered with the city to no more than 2 per year. Require annual registration same as Seattle business licenses require.

Require that Tree Care Provider companies have a WA State contractor's license to ensure they have workers' compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

Colleen Weinstein

[colleen@dyggin.com](mailto:colleen@dyggin.com)

4112 ne 103rd pl

Seattle , Washington 98125

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**From:** Karin de Weille <deweille@gm.sl.c.edu>

**Sent:** Saturday, August 15, 2020 8:01 AM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and

short platting process

- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees

The following changes to the draft Director's Rule are needed:

- Change Subject Title to remove words "land division" and replace with "Development"
- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."
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red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.

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Thank you for protecting our urban forest.

Karin de Weille

[deweille@gm.slc.edu](mailto:deweille@gm.slc.edu)

7750 38th Ave NE

Seattle, Washington 98115

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**From:** Kassandra Strople <info@email.actionnetwork.org>

**Sent:** Saturday, August 15, 2020 8:05 AM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

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The following changes to the draft Director's Rule are needed:

- Change Subject Title to remove words "land division" and replace with "Development"
- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."
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Thank you for protecting our urban forest.

Kassandra Strople

[kestersonstrople@gmail.com](mailto:kestersonstrople@gmail.com)

2918 27th Ave W

Seattle, Washington 98199

**From:** Suzette Crockett <info@email.actionnetwork.org>  
**Sent:** Saturday, August 15, 2020 8:08 AM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

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Thank you for protecting our urban forest.

Suzette Crockett

[suzettecrockett@gmail.com](mailto:suzettecrockett@gmail.com)

717 Gladstone St..

Bellingha3, Washington 98225

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**From:** Bryant Durrell <durrell@innocence.com>

**Sent:** Saturday, August 15, 2020 8:08 AM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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SMC 25.11.090

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Thank you for protecting our urban forest.

Bryant Durrell

[durrell@innocence.com](mailto:durrell@innocence.com)

806A NW 49th St.

Seattle, Washington 98107

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**From:** Amelia Baggett <info@email.actionnetwork.org>

**Sent:** Saturday, August 15, 2020 8:17 AM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

Amelia Baggett

[Ameliapowell@gmail.com](mailto:Ameliapowell@gmail.com)

3811 23rd Ave W

Seattle, Washington 98199

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**From:** Amy Vandergon <info@email.actionnetwork.org>  
**Sent:** Saturday, August 15, 2020 8:29 AM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Seattle's urban forest is part of what makes this city special. My neighborhood (Capitol Hill) would not be the same without its big trees.

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats and need to be considered at the beginning of the development process. The language of this SEPA code section should be included in the Director’s Rule to be certain that the code is complied with.
- SECTION 6. SDCI should adopt SDOT’s registration process and requirements to assist Tree Care Providers in complying with city code and regulations. Reduce the number of citations that will remove a Tree Care Provider from being registered with the city to no more than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor’s license to ensure they have workers’ compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

Amy Vandergon  
[amyvandergon@gmail.com](mailto:amyvandergon@gmail.com)  
1027 Summit Ave E  
Seattle, Washington 98102

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**From:** Debra Lochner Doyle <info@email.actionnetwork.org>  
**Sent:** Saturday, August 15, 2020 8:47 AM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090

- Tightening tree removal requirements for exceptional trees as hazard trees

The following changes to the draft Director’s Rule are needed:

- Change Subject Title to remove words “land division” and replace with “Development”
- PURPOSE AND BACKGROUND. add “SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city.”
- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as “a group of 3 or more significant trees with overlapping or touching crowns.” Include street trees in groves.
- Add “Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages.”
- Add “All replacement trees regardless of size are protected trees and can’t be removed.”
- SECTION 2. Change the heading to “TREE PROTECTION”. Remove references to “Exceptional Trees” only and change to “Trees”. e.g., change “Exceptional Tree Protection Areas” to “Tree Protection Areas”.
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Thank you for protecting our urban forest.

Debra Lochner Doyle

[doylegnd@aol.com](mailto:doylegnd@aol.com)

2802 30th Ave W

Seattle, Washington 98199-2714

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**From:** Colin Wright <COLINMSN@MSN.COM>

**Sent:** Saturday, August 15, 2020 9:26 AM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

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Thank you for protecting our urban forest.

Colin Wright

[COLINMSN@MSN.COM](mailto:COLINMSN@MSN.COM)

1402 N. 135th Place

Seattle, Washington 98133

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**From:** Lauren Tucker <ltucker117@comcast.net>

**Sent:** Saturday, August 15, 2020 9:33 AM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

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Thank you for protecting our urban forest.

Lauren Tucker

[ltucker117@comcast.net](mailto:ltucker117@comcast.net)

3614 SW Trenton St  
Seattle, Washington 98126

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**From:** Jennifer Nagel <info@email.actionnetwork.org>  
**Sent:** Saturday, August 15, 2020 9:42 AM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

For the health of our environment: Cleaner air, water, and shade and habitat for people and animals: Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

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Thank you for protecting our urban forest.

Jennifer Nagel

[jenanagel@hotmail.com](mailto:jenanagel@hotmail.com)

3801-34th Ave. W.

Seattle, Washington 98199

---

**From:** Kaija Jones <kaija@wearewatts.com>

**Sent:** Saturday, August 15, 2020 9:45 AM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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Thank you for protecting our urban forest.

Kaija Jones

[kaija@wearewatts.com](mailto:kaija@wearewatts.com)

10727 SW 232nd St

Vashon, Washington 98070

---

**From:** Philip Stielstra <pstielstra@comcast.net>

**Sent:** Saturday, August 15, 2020 10:11 AM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

In 2011 I became a volunteer Seattle Tree Ambassador, dedicated to improving the quality and quantity of Seattle's canopy. I have designed and led two Tree Walks in Seattle to celebrate the marvelous diversity of trees that Seattle has. I have worked hard to add to Seattle's canopy through tree planting events, even so far as donating trees myself to the City

of Seattle and engaging the city's youth in planting those trees. When the City doesn't even protect and safeguard from the developer's chainsaw the amazing trees they have, it makes a mockery of the City's commitment to restore and preserve Seattle's canopy.

Please adopt, with amendments, SDCI's Director's Rule 13-2020.

Sincerely,

Philip Stielstra  
4208 NE 107th St  
Seattle, WA 98125

Philip Stielstra  
[pstielstra@comcast.net](mailto:pstielstra@comcast.net)  
4208 NE 107th St  
Seattle, Washington 98125

---

**From:** Bernie Bowers <bernieb3@comcast.net>  
**Sent:** Saturday, August 15, 2020 10:13 AM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

We need to act now!!!! I have seen this city lose so much of what my family came here for in 1962. Let's use our heads, people. Less trees, less oxygen, less beauty, less wildlife --- hell, less life period!!!!

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long

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- Under SMC 25.11.090 the Director has the authority to require “one or more trees” to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.
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- SECTION 6. SDCI should adopt SDOT’s registration process and requirements to assist Tree Care Providers in complying with city code and regulations. Reduce the number of citations that will remove a Tree Care Provider from being registered with the city to no more than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor’s license to ensure they have workers’ compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

Bernie Bowers

[bernieb3@comcast.net](mailto:bernieb3@comcast.net)

7553 Earl Avenue Northwest

Seattle, Washington 98117

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**From:** Diana Blackham <dianablackham@comcast.net>  
**Sent:** Saturday, August 15, 2020 10:21 AM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI’s Director’s Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees

The following changes to the draft Director's Rule are needed:

- Change Subject Title to remove words "land division" and replace with "Development"
- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."
- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as "a group of 3 or more significant trees with overlapping or touching crowns." Include street trees in groves.
- Add "Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to

maintain a diversity of tree species and ages.”

- Add “All replacement trees regardless of size are protected trees and can’t be removed.”
- SECTION 2. Change the heading to “TREE PROTECTION”. Remove references to “Exceptional Trees” only and change to “Trees”. e.g., change “Exceptional Tree Protection Areas” to “Tree Protection Areas”.
- SECTION 4. Add “The Director shall have the authority to allow replacement trees on both public and private property to meet the goals and objectives of race and social justice under Seattle’s Equity and Environment Initiative.”
- Under SMC 25.11.090 the Director has the authority to require “one or more trees” to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.
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Thank you for protecting our urban forest.

Diana Blackham

[dianablackham@comcast.net](mailto:dianablackham@comcast.net)

2511 W Fulton St  
Seattle, Washington 98199

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**From:** Lucy Bowers-Wildblood <info@email.actionnetwork.org>  
**Sent:** Saturday, August 15, 2020 10:39 AM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** RE: SDCI's Director's Rule 13-2020 + amendments.

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

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The following changes to the draft Director's Rule are needed:

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Thank you for protecting our urban forest.

Lucy Bowers-Wildblood

[mz.beatdizzy@gmail.com](mailto:mz.beatdizzy@gmail.com)

1425 Broadway #20090

Seattle, Washington 98122

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**From:** Paul Gates <info@email.actionnetwork.org>  
**Sent:** Saturday, August 15, 2020 10:56 AM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

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The following changes to the draft Director’s Rule are needed:

- Change Subject Title to remove words “land division” and replace with “Development”
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Thank you for protecting our urban forest.

Paul Gates

[pjmgates@gmail.com](mailto:pjmgates@gmail.com)

5250 35th Avenue Northeast

Seattle, Washington 98105

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**From:** Rebecca Cooper <africa1983fr@yahoo.fr>

**Sent:** Saturday, August 15, 2020 11:08 AM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments and without further delay, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal! Seattle citizens have been pleading for stronger tree protections for over a decade and the recommendations of the Seattle Urban Forestry Commission make clear the steps that must be taken to accomplish this. It's very frustrating that a few financially interested parties want to stall implementation of these new requirements for another year-and-a-half. Please take this opportunity to finalize a more rigorous and effective tree protection for the city, considering the amendments requested by "Save our Trees". It is essential to maintaining the character and livability of Seattle.

Rebecca Cooper

[africa1983fr@yahoo.fr](mailto:africa1983fr@yahoo.fr)

1000 Queen Anne Ave N., Apt 103.

Seattle, Washington 98109-3641

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**From:** Catherine Englehart <cathy@cathyenglehart.com>

**Sent:** Saturday, August 15, 2020 11:11 AM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard

height (DSH) from 30 inches

- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
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- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees

The following changes to the draft Director's Rule are needed:

- Change Subject Title to remove words "land division" and replace with "Development"
- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."
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- SECTION 2. Change the heading to "TREE PROTECTION". Remove references to "Exceptional Trees" only and change to "Trees". e.g., change "Exceptional Tree Protection Areas" to "Tree Protection Areas".
- SECTION 4. Add "The Director shall have the authority to allow replacement trees on both public and private property to meet the goals and objectives of race and social justice under Seattle's Equity and Environment Initiative."
- Under SMC 25.11.090 the Director has the authority to require "one or more trees" to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve

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Thank you for protecting our urban forest.

Catherine Englehart

[cathy@cathyenglehart.com](mailto:cathy@cathyenglehart.com)

5029 Roosevelt Way NE

Seattle, Washington 98105

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**From:** mindi lee <mindimudd@comcast.net>

**Sent:** Saturday, August 15, 2020 11:37 AM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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Thank you for protecting our urban forest.

mindie lee

[mindimudd@comcast.net](mailto:mindimudd@comcast.net)

7412 east green lake drive, unit A  
Seattle, Washington 98115

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**From:** Rob Zisette <[rzisette@herrerainc.com](mailto:rzisette@herrerainc.com)>  
**Sent:** Saturday, August 15, 2020 11:46 AM  
**To:** Pinto de Bader, Sandra <[Sandra.Pinto\\_de\\_Bader@Seattle.gov](mailto:Sandra.Pinto_de_Bader@Seattle.gov)>  
**Subject:** SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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Our urban forest is very important to me and everyone I know. Thanks for protecting it.

Rob Zisette  
[rzisette@herrerainc.com](mailto:rzisette@herrerainc.com)  
3519 Burke Ave N  
Seattle, Washington 98103

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**From:** Barbara O'Steen <[info@email.actionnetwork.org](mailto:info@email.actionnetwork.org)>  
**Sent:** Saturday, August 15, 2020 12:17 PM  
**To:** Pinto de Bader, Sandra <[Sandra.Pinto\\_de\\_Bader@Seattle.gov](mailto:Sandra.Pinto_de_Bader@Seattle.gov)>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

We have been waiting ELEVEN YEARS for you to make this stronger provision for saving trees. In the meantime CLIMATE CHANGE is causing wild fires and floods and much more

trouble is headed for us that do not make plans. And TREES are one of the most important components!!

Barbara O'Steen 60 years living in Seattle with children and grandchildren needing you to act!!!

Barbara O'Steen

[barbarajosteen@yahoo.com](mailto:barbarajosteen@yahoo.com)

4364 SW Cloverdale St.

Seattle, Washington 988136

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**From:** Ginger Goldman <gingergold@comcast.net>  
**Sent:** Saturday, August 15, 2020 12:20 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."
- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as "a group of 3 or more significant trees with overlapping or touching crowns." Include street trees in groves.
- Add "Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages."
- Add "All replacement trees regardless of size are protected trees and can't be removed."
- SECTION 2. Change the heading to "TREE PROTECTION". Remove references to "Exceptional Trees" only and change to "Trees". e.g., change "Exceptional Tree Protection Areas" to "Tree Protection Areas".
- SECTION 4. Add "The Director shall have the authority to allow replacement trees on both public and private property to meet the goals and objectives of race and social justice under Seattle's Equity and Environment Initiative."
- Under SMC 25.11.090 the Director has the authority to require "one or more trees" to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.

- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats and need to be considered at the beginning of the development process. The language of this SEPA code section should be included in the Director's Rule to be certain that the code is complied with.
- SECTION 6. SDCI should adopt SDOT's registration process and requirements to assist Tree Care Providers in complying with city code and regulations. Reduce the number of citations that will remove a Tree Care Provider from being registered with the city to no more than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor's license to ensure they have workers' compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

Ginger Goldman

[gingergold@comcast.net](mailto:gingergold@comcast.net)

3801 Chilberg Pl sw

Seattle , Washington 98116

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**From:** Sharon LeVine <info@email.actionnetwork.org>

**Sent:** Saturday, August 15, 2020 12:26 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees

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Thank you for protecting our urban forest.

Sharon LeVine

[sweetumsseattle@yahoo.com](mailto:sweetumsseattle@yahoo.com)

2819 4th Ave West

Seattle, Washington 98119-2338

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**From:** Ramona Gault <info@email.actionnetwork.org>

**Sent:** Saturday, August 15, 2020 12:29 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI’s Director’s Rule 13-2020

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

In the 30-some years I've lived in Seattle, I've seen neighborhoods overtaken by multistory megabuildings, all the mature trees mowed down. These trees cannot be simply replaced as they require decades to grow. These mature trees provide a hospitable environment for humans and animals and help protect against climate change.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
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certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

Ramona Gault

[sheepspinner@gmail.com](mailto:sheepspinner@gmail.com)

1305 N 167th St.

Shoreline, Washington 98133

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**From:** Kristin Tregillus <ktregillus@comcast.net>

**Sent:** Saturday, August 15, 2020 12:35 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Seattle has lost much of its tree canopy since I moved here more than 40 years ago. We need to do everything we can to preserve the "emerald" in the emerald city.

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and

short platting process

- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
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Thank you for protecting our urban forest.

Kristin Tregillus

[ktregillus@comcast.net](mailto:ktregillus@comcast.net)

2722 31st Ave. S.

Seattle, Washington 98144

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**From:** Don Syverson <info@email.actionnetwork.org>

**Sent:** Saturday, August 15, 2020 12:36 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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Thank you for protecting our urban forest. These rules are reasonable guidelines for developers to work around.

Don Syverson  
Architect (retired)

Don Syverson  
[dsy.ans@gmail.com](mailto:dsy.ans@gmail.com)

4707 35th Ave NE  
Seattle, Washington 98105

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**From:** Lisa Mazzola <lmazzola@tampabay.rr.com>  
**Sent:** Saturday, August 15, 2020 12:40 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

Lisa Mazzola

[lmazzola@tampabay.rr.com](mailto:lmazzola@tampabay.rr.com)

1723 W Followthru Dr

Tampa, Florida 33612

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**From:** Yasemin Ullusarac <info@email.actionnetwork.org>

**Sent:** Saturday, August 15, 2020 12:42 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Save Our Trees!

**CAUTION: External Email**

Sandra Pinto de Bader,

Seattle's trees and urban forest are vital to keeping our city healthy and livable. Trees and the urban forest comprise a vital green infrastructure. Trees reduce air pollution, storm water runoff and climate impacts like heat island effects, while providing essential habitat for birds and other wildlife. They are important for the physical and mental health of our residents.

Seattle's rapid growth and an outdated tree ordinance are reducing these beneficial effects as trees are removed and not replaced. It is urgent to act now to stop this continued loss of trees, particularly large mature trees and tree groves. It is important to promote environmental equity as trees are replaced.

Please update Seattle's Tree Protection Ordinance as recommended in the latest draft by the Seattle Urban Forestry Commission.

Here are the key provisions that need to be in the updated tree ordinance:

1. Expand the existing Tree Removal and Replacement Permit Program, including 2-week public notice and posting on-site, as used by the Seattle Department of Transportation (SDOT) – to cover all Significant Trees (6" and larger diameter at breast height (DBH)) on private property in all land use zones, both during development and outside development.
2. Require the replacement of all Significant trees removed with trees that in 25 years will reach equivalent canopy volume – either on site or pay a replacement fee into a City Tree Replacement and Preservation Fund. Allow the Fund to also accept fines, donations, grants and set up easements.
3. Retain current protections for Exceptional Trees and reduce the upper threshold for Exceptional Trees to 24" DBH, protect tree groves and prohibit Significant Trees being removed on undeveloped lots.
4. Allow removal of no more than 2 Significant non-Exceptional Trees in 3 years per lot outside development
5. Establish one citywide database for applying for Tree Removal and Replacement Permits and to track changes in the tree canopy.
6. Post online all permit requests and permit approvals for public viewing.
7. Expand SDOT's existing tree service provider's registration and certification to register all Tree Service Providers (arborists) working on trees in Seattle.
8. Provide adequate funding in the budget to implement and enforce the updated ordinance.

Yasemin Ulusarac

[yaseminaykan@yahoo.com](mailto:yaseminaykan@yahoo.com)

4917 2nd Ave NW

Seattle, Washington 98107

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**From:** gabe shulman <info@email.actionnetwork.org>

**Sent:** Saturday, August 15, 2020 12:46 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

gabe shulman

[gabeshulman@hotmail.com](mailto:gabeshulman@hotmail.com)

3318 19th Ave S  
Seattle, Washington 98144

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**From:** Erin Branigan <info@email.actionnetwork.org>  
**Sent:** Saturday, August 15, 2020 1:41 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees

The following changes to the draft Director's Rule are needed:

- Change Subject Title to remove words “land division” and replace with “Development”
- PURPOSE AND BACKGROUND. add “SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city.”
- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as “a group of 3 or more significant trees with overlapping or touching crowns.” Include street trees in groves.
- Add “Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages.”
- Add “All replacement trees regardless of size are protected trees and can’t be removed.”
- SECTION 2. Change the heading to “TREE PROTECTION”. Remove references to “Exceptional Trees” only and change to “Trees”. e.g., change “Exceptional Tree Protection Areas” to “Tree Protection Areas”.
- SECTION 4. Add “The Director shall have the authority to allow replacement trees on both public and private property to meet the goals and objectives of race and social justice under Seattle’s Equity and Environment Initiative.”
- Under SMC 25.11.090 the Director has the authority to require “one or more trees” to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.
- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats and need to be considered at the beginning of the development process. The language of this SEPA code section should be included in the Director’s Rule to be certain that the code is complied with.
- SECTION 6. SDCI should adopt SDOT’s registration process and requirements to assist Tree Care Providers in complying with city code and regulations. Reduce the number of citations that will remove a Tree Care Provider from being registered with the city to no more

than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor's license to ensure they have workers' compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

Erin Branigan

[braniganerin@yahoo.com](mailto:braniganerin@yahoo.com)

1900 NE 105TH ST

SEATTLE, Washington 98125

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From: [debrathe1too@everyactioncustom.com](mailto:debrathe1too@everyactioncustom.com) <[debrathe1too@everyactioncustom.com](mailto:debrathe1too@everyactioncustom.com)>

Sent: Saturday, August 15, 2020 2:09 PM

To: Pinto de Bader, Sandra <[Sandra.Pinto\\_de\\_Bader@Seattle.gov](mailto:Sandra.Pinto_de_Bader@Seattle.gov)>

Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCI is no longer concerned about the fate of the smaller, non-exceptional trees.
- Protect red alders, black cottonwoods, and bitter cherries. These native trees provide important resources to birds and other wildlife and contribute to our sense of place in Seattle. Following the "right

tree, right place" philosophy, these native trees can safely thrive and should be protected like other species.

- Expand the definition of tree groves to stands of six or more trees at least six inches in diameter, including street trees. Tree groves provide important habitat for birds and are becoming less common outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove.
- Require public notice postings on development site and online for removal of Exceptional trees, even when hazardous, to ensure community members know when and where legal tree removal is occurring.
- Require replacement for trees removed from groves and removed hazard trees.
- Align SDCI's proposed Tree Care Provider Acknowledgement with SDOT's Tree Service Provider Registration. Do not automatically renew this form annually. It should be updated each year. Reduce the number of infractions tree service providers can incur in a year before they are removed from the City's list to do business from more than three infractions to more than two infractions.
- Section 4: Preference for planting off-site replacement trees on public property is restrictive. The Director should be able to allow replacement trees not only on public property, but also on private property, where desired by the property owner, in order to meet the City's goals and objectives of race and social justice under Seattle's Equity and Environment Initiative.

The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
Deb Dur

3301 Beacon Ave S Apt 10 Seattle, WA 98144-6358 [debrathe1too@hotmail.com](mailto:debrathe1too@hotmail.com)

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**From:** Catherine Ruha <[info@email.actionnetwork.org](mailto:info@email.actionnetwork.org)>

**Sent:** Saturday, August 15, 2020 2:20 PM

**To:** Pinto de Bader, Sandra <[Sandra.Pinto\\_de\\_Bader@Seattle.gov](mailto:Sandra.Pinto_de_Bader@Seattle.gov)>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees

The following changes to the draft Director's Rule are needed:

- Change Subject Title to remove words "land division" and replace with "Development"
- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."
- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as "a group of 3 or more significant trees with overlapping or touching crowns." Include street trees in groves.
- Add "Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages."
- Add "All replacement trees regardless of size are protected trees and can't be removed."
- SECTION 2. Change the heading to "TREE PROTECTION". Remove references to "Exceptional Trees" only and change to "Trees". e.g., change "Exceptional Tree Protection Areas" to "Tree Protection Areas".

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- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats and need to be considered at the beginning of the development process. The language of this SEPA code section should be included in the Director’s Rule to be certain that the code is complied with.
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Trees are vital to the health of this city. They cool the air, clean the air, and generate more needed oxygen. During this COVID19 epidemic, they are a sign of beauty and hope for all of us.

Thank you for protecting our urban forest.

Catherine Ruha

[ruhac@outlook.com](mailto:ruhac@outlook.com)

1541 NE 91st Street

Seattle, Washington 98115

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**From:** Vincent DeLuca <vince.deluca13@comcast.net>  
**Sent:** Saturday, August 15, 2020 2:23 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

A beautiful city cannot claim to be so unless it has a substantial canopy of trees. Vincent DeLuca

Vincent DeLuca

[vince.deluca13@comcast.net](mailto:vince.deluca13@comcast.net)

3715 sw Hanford st

Seattle , Washington 98126

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**From:** Richard Huey <info@email.actionnetwork.org>  
**Sent:** Saturday, August 15, 2020 2:32 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

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Richard Huey

[huey.rick@gmail.com](mailto:huey.rick@gmail.com)

1710 Bradner PI S

Seattle, Washington 98144

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**From:** tnight@pobox.com <tnight@pobox.com>

**Sent:** Saturday, August 15, 2020 2:57 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

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Thank you for protecting our urban forest.

[tnight@pobox.com](mailto:tnight@pobox.com)

3617 23rd Ave W

Seattle, Washington 98199

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**From:** Tom Hundley <info@email.actionnetwork.org>

**Sent:** Saturday, August 15, 2020 3:01 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Constituent Feedback re: Construction & Inspections' Director's Rule 13-2020 - please adopt, w/amendments

**CAUTION: External Email**

Sandra Pinto de Bader,

Thank you very much for all you and your fine staff do each and every day to help make our beautiful city more livable and pleasant. You're doing fine work and I'm proud of you.

My hard working and conscientious friends with Don't Clearcut Seattle and Friends of Urban Forests have made me aware of the important effort being conducted by the Department of Construction and Inspections as relates to a draft update to its 2008 Director's Rule on Exceptional Trees that will be used to assist developers and land owners with regard to tree protection.

I agree with the fine folks behind the Save Our Trees movement here in lovely Seattle, and join them is asking that you "... please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements ..."

Our city - with all the remarkable development that's been going on over the past decade and a half - has some crucial decisions to make about how we'll best protect our wonderful urban forest. The updated Director's Rule that I refer to above is - in my opinion - a very meaningful step forward that will help assure citizens of this amazing city that trees - so important to a healthy community - will be safe and abundant for us all to enjoy in the decades to come.

I urge your office to thoroughly consider the arguments being presented by my friends with Don't Clearcut Seattle, and to find your way toward agreeing with them that indeed "... Seattle must move forward now, WITHOUT the delay urged by some, in adopting [the] updated Director's Rule ... [and that] ... the amendments proposed below be [accepted]."

It is my understanding that improving tree protections all throughout gorgeous Seattle was initially brought forward by our City Council more than a decade ago. I feel that it's entirely wise and reasonable to finally move ahead on it favorably.

My friends with Don't Clearcut Seattle have pointed out - and I agree - that "[the] following updates as proposed in the draft Director's Rule are great steps forward [...]"

[1] Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches

[2] Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process

[3] Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires

[4] Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove

[5] Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090

[and 6] Tightening tree removal requirements for exceptional trees as hazard trees ..."

I would also like your fine office to know that I agree with Don't Clearcut Seattle that "[the] following changes to the draft Director's Rule are needed [...]"

[1] Change Subject Title to remove words 'land division' and replace with 'Development'

[2] PURPOSE AND BACKGROUND. add 'SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city.'

[3] SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as 'a group of 3 or more significant trees with overlapping or touching crowns.'

[4] Include street trees in groves.

[5] Add 'Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages.'

[6] Add 'All replacement trees regardless of size are protected trees and [cannot] be removed.'

[7] SECTION 2. Change the heading to 'TREE PROTECTION'. Remove references to 'Exceptional Trees' only and change to 'Trees'. e.g., change 'Exceptional Tree Protection Areas' to 'Tree Protection Areas.'

[8] SECTION 4. Add 'The Director shall have the authority to allow replacement trees on both public and private property to meet the goals and objectives of race and social justice under Seattle's Equity and Environment Initiative.'

[9] Under SMC 25.11.090 the Director has the authority to require 'one or more trees' to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.

[10] SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats and need to be considered at the beginning of the development process. The language of this SEPA code section should be included in the Director's Rule to be certain that the code is complied with.

[and 11] SECTION 6. SDCI should adopt SDOT's registration process and requirements to assist Tree Care Providers in complying with city code and regulations. Reduce the number of citations that will remove a Tree Care Provider from being registered with the city to no more than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor's license to ensure they have workers' compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a

certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done."

As I've identified above, the thoughtful and dedicated work that my friends with Don't Clearcut Seattle and Friends of Urban Forests are engaged in is a huge help to our delightful city. It's because of devoted citizen activists such as them that vital environmental protections are now in place. Let's not take these protections for granted, please. As you consider the pros and cons and weigh the benefits versus the costs, I hope you will agree wholeheartedly with me that it is now high time that the SDCI's Director's Rule 13-2020 with amendments be adopted.

Thank you very much for your time with my communication. I know that you and your excellent staff value the trees that help make Seattle a healthy and beautiful place to live, work, study, worship, and recreate. Wishing you a tremendous and peaceful summer,

Tom Hundley  
[hundleythomasr@gmail.com](mailto:hundleythomasr@gmail.com)

Tom Hundley  
[hundleythomasr@gmail.com](mailto:hundleythomasr@gmail.com)  
5564 29th Ave NE  
Seattle, Washington 98105

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**From:** Summer Montacute <info@email.actionnetwork.org>  
**Sent:** Saturday, August 15, 2020 3:01 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division,

including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees

The following changes to the draft Director's Rule are needed:

- Change Subject Title to remove words "land division" and replace with "Development"
- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."
- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as "a group of 3 or more significant trees with overlapping or touching crowns." Include street trees in groves.
- Add "Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages."
- Add "All replacement trees regardless of size are protected trees and can't be removed."
- SECTION 2. Change the heading to "TREE PROTECTION". Remove references to "Exceptional Trees" only and change to "Trees". e.g., change "Exceptional Tree Protection

Areas” to ”Tree Protection Areas”.

- SECTION 4. Add “The Director shall have the authority to allow replacement trees on both public and private property to meet the goals and objectives of race and social justice under Seattle’s Equity and Environment Initiative.”
- Under SMC 25.11.090 the Director has the authority to require “one or more trees” to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.
- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats and need to be considered at the beginning of the development process. The language of this SEPA code section should be included in the Director’s Rule to be certain that the code is complied with.
- SECTION 6. SDCI should adopt SDOT’s registration process and requirements to assist Tree Care Providers in complying with city code and regulations. Reduce the number of citations that will remove a Tree Care Provider from being registered with the city to no more than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor’s license to ensure they have workers’ compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

Summer Montacute

[summermontacute@gmail.com](mailto:summermontacute@gmail.com)

4325 Jill Place South

Seattle, Washington 98108

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**From:** Cynthia Young <info@email.actionnetwork.org>

**Sent:** Saturday, August 15, 2020 3:02 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees

The following changes to the draft Director's Rule are needed:

- Change Subject Title to remove words "land division" and replace with "Development"
- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."
- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as "a group of 3 or more significant trees with

overlapping or touching crowns.” Include street trees in groves.

- Add “Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages.”
- Add “All replacement trees regardless of size are protected trees and can’t be removed.”
- SECTION 2. Change the heading to “TREE PROTECTION”. Remove references to “Exceptional Trees” only and change to “Trees”. e.g., change “Exceptional Tree Protection Areas” to “Tree Protection Areas”.
- SECTION 4. Add “The Director shall have the authority to allow replacement trees on both public and private property to meet the goals and objectives of race and social justice under Seattle’s Equity and Environment Initiative.”
- Under SMC 25.11.090 the Director has the authority to require “one or more trees” to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.
- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats and need to be considered at the beginning of the development process. The language of this SEPA code section should be included in the Director’s Rule to be certain that the code is complied with.
- SECTION 6. SDCI should adopt SDOT’s registration process and requirements to assist Tree Care Providers in complying with city code and regulations. Reduce the number of citations that will remove a Tree Care Provider from being registered with the city to no more than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor’s license to ensure they have workers’ compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

Cynthia Young

[pearl206@aol.com](mailto:pearl206@aol.com)

1523 NE 98th ST

Maple Leaf in North Seattle, Washington 98115

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**From:** Kari Olson <info@email.actionnetwork.org>

**Sent:** Saturday, August 15, 2020 3:18 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, (with amendments), SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements. In addition: The criteria used to determine the definition of a tree; Native, ornamental woody plants that attain a height of 20 feet or greater need to be included regardless of whether these species were introduced or naturalized. Grove of trees make for continuous canopies in urban areas. Even grouped woody plants that are treelike, in optimum habitats, or under special conditions - gardens, arboretum like estates and so forth. All trees; whether scientific, cultural, economic and aesthetic are all important to a city's urban forest. In the wake of development many "trees, and treelike species are unnecessarily destroyed when in fact could and should be preserved as much as possible. Once upon a time, Seattle's forest economy boomed. In essence a capitalist system linked with nature, labor, and turning natural resources into commodities to be traded on the market. To Preserve Seattle's Urban Forest is to adopt a capitalist system in the Directors Rule 13-2020. Not only saving mature trees but in saving the matrix of what hakes up Seattle's Urban Forest from the ground up.

Seattle's move forward is adopting updates to the Director's Rule with amendments and considerations proposed (above) and below. Increasing protection for Seattle's Urban Forest first proposed by Seattle City Council was 11 years ago.

The following updates proposed in draft Director's Rule are necessary steps forward:

- Reducing the upper threshold on exceptional trees and tree-like trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees and tree-like trees of 6 inches DSH and larger as protected trees, starting in the platting and short platting processes
- Requiring Tree Care Providers and like-kind companies and operations to register with the City of Seattle Urban Forestry Division (as Seattle Dept. of Transportation requires)
- Continuation of preservation and protection of tree and tree-like groves as exceptional trees, whether a tree is removed from a grove
- Making clear that all exceptional trees and tree-likes removed during development must be replaced and or (when feasible) relocated per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees and tree-likes as hazard trees

The following changes to the draft Director's Rule are needed:

- Change Subject Title to remove use of "land division" to "Land Development"
- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees and tree-likes at 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting processes, and that projects must be designed to maximize the retention of existing trees and tree-likes. This requirement continues throughout any subsequent development on all lots in all zones in the City of Seattle."
- SECTION 1. Reduce the number of trees and tree-likes and sizes required to be deemed as a tree grove. Exemplified by the cities of Kirkland, Woodinville, and Duvall define a tree grove as "a group of 3 or more significant trees with overlapping or touching crowns." Include street trees and tree-likes in groves.
- Add "Significant trees and tree-likes may become exceptional in size. They are future replacements in the urban forest for exceptional trees when they die, fail or fall. Development projects must be designed to maximize the retention, preservation of both exceptional and significant trees and tree-likes to maintain a diversity of tree species and ages."
- Add "All replacement trees and tree-likes (regardless of size) are protected trees and tree-likes should not be removed." \*Unless otherwise noted by professionals as to whether removals warrant consideration.
- SECTION 2. Change the heading to "TREE PROTECTION". Remove references to "Exceptional Trees and tree-likes" only and change to "Trees". e.g., change "Exceptional Tree Protection Areas" to "Tree Protection Areas".
- SECTION 4. Add "The Director shall have the authority to allow replacement trees on both

public and private properties to meet with goals and objectives of Seattle's Equity and Environment Initiatives."

- Under SMC 25.11.090 the Director has the authority to require "one or more trees and tree-likes" to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree and tree-likes removed, with goals to achieve equivalent canopy area and volume to 25 years. Any in-lieu fees must also increase to reflect sizes of removed tree and tree-like increases.

Seattle, realistically can not replace an 80-year-old Western Red Cedar or an exceptional Madrona tree-like tree and expect to maintain essential layers of canopy!!! Seattle's Urban Forest of today is exceptional in the fact that there are so many different species of trees and tree-like's that make up our "Emerald Green Oasis."

- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats and need to be considered at the beginning of the development process. The language of this SEPA code section should be included in the Director's Rule to be certain that the code is complied with.

- SECTION 6. SDCI should adopt SDOT's registration process and requirements to assist Tree Care Providers in complying with city code and regulations. Reduce the number of citations that will remove a Tree Care Provider from being registered with the city to no more than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor's license to ensure they have workers' compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you,

Kari A. Olson

Green Seattle Partnership Urban Forester

Kari Olson

[the4hrgardener@outlook.com](mailto:the4hrgardener@outlook.com)

1911 E. Eaton Place

Seattle, Washington 98112

**From:** Mary Keeler <mkeeler@uw.edu>  
**Sent:** Saturday, August 15, 2020 4:03 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees

The following changes to the draft Director's Rule are needed:

- Change Subject Title to remove words "land division" and replace with "Development"
- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the

city.”

- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as “a group of 3 or more significant trees with overlapping or touching crowns.” Include street trees in groves.
- Add “Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages.”
- Add “All replacement trees regardless of size are protected trees and can’t be removed.” (Remember, it takes decades to replace a mature tree!)
- SECTION 2. Change the heading to “TREE PROTECTION”. Remove references to “Exceptional Trees” only and change to “Trees”. e.g., change “Exceptional Tree Protection Areas” to “Tree Protection Areas”.
- SECTION 4. Add “The Director shall have the authority to allow replacement trees on both public and private property to meet the goals and objectives of race and social justice under Seattle’s Equity and Environment Initiative.”
- Under SMC 25.11.090 the Director has the authority to require “one or more trees” to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development!
- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats and need to be considered at the beginning of the development process. The language of this SEPA code section should be included in the Director’s Rule to be certain that the code is complied with.
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certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

Mary Keeler

[mkeeler@uw.edu](mailto:mkeeler@uw.edu)

1102 NW 83rd St

Seattle, Washington 98117

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**From:** Martha Rost <generalrost@comcast.net>

**Sent:** Saturday, August 15, 2020 4:17 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires

- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090

- Tightening tree removal requirements for exceptional trees as hazard trees

The following changes to the draft Director’s Rule are needed:

- Change Subject Title to remove words “land division” and replace with “Development”
- PURPOSE AND BACKGROUND. add “SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city.”
- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as “a group of 3 or more significant trees with overlapping or touching crowns.” Include street trees in groves.
- Add “Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages.”
- Add “All replacement trees regardless of size are protected trees and can’t be removed.”
- SECTION 2. Change the heading to “TREE PROTECTION”. Remove references to “Exceptional Trees” only and change to “Trees”. e.g., change “Exceptional Tree Protection Areas” to “Tree Protection Areas”.
- SECTION 4. Add “The Director shall have the authority to allow replacement trees on both public and private property to meet the goals and objectives of race and social justice under Seattle’s Equity and Environment Initiative.”
- Under SMC 25.11.090 the Director has the authority to require “one or more trees” to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.
- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats

and need to be considered at the beginning of the development process. The language of this SEPA code section should be included in the Director's Rule to be certain that the code is complied with.

- SECTION 6. SDCI should adopt SDOT's registration process and requirements to assist Tree Care Providers in complying with city code and regulations. Reduce the number of citations that will remove a Tree Care Provider from being registered with the city to no more than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor's license to ensure they have workers' compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

Martha Rost

[generalrost@comcast.net](mailto:generalrost@comcast.net)

1621 East Garfield Street

Seattle, Washington 98112

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**From:** joanie parsons <joanie@parsonspr.com>

**Sent:** Saturday, August 15, 2020 4:29 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated

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The following changes to the draft Director's Rule are needed:

- Change Subject Title to remove words "land division" and replace with "Development"
- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."
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- Add "All replacement trees regardless of size are protected trees and can't be removed."
- SECTION 2. Change the heading to "TREE PROTECTION". Remove references to "Exceptional Trees" only and change to "Trees". e.g., change "Exceptional Tree Protection Areas" to "Tree Protection Areas".
- SECTION 4. Add "The Director shall have the authority to allow replacement trees on both

public and private property to meet the goals and objectives of race and social justice under Seattle's Equity and Environment Initiative."

- Under SMC 25.11.090 the Director has the authority to require "one or more trees" to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.
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Thank you for protecting our urban forest.

joanie parsons

[joanie@parsonspr.com](mailto:joanie@parsonspr.com)

3047 NW 64

seattle, Washington 98107

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**From:** Amy Hansen <info@email.actionnetwork.org>

**Sent:** Saturday, August 15, 2020 4:33 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

Sandra Pinto de Bader,

Greetings! I am a mother who cares about protecting our forest ecosystems. Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

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The following changes to the draft Director's Rule are needed:

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- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."
- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as "a group of 3 or more significant trees with overlapping or touching crowns." Include street trees in groves.
- Add "Significant trees may become exceptional as they grow in size. They are future

replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages.”

- Add “All replacement trees regardless of size are protected trees and can’t be removed.”
- SECTION 2. Change the heading to “TREE PROTECTION”. Remove references to “Exceptional Trees” only and change to “Trees”. e.g., change “Exceptional Tree Protection Areas” to “Tree Protection Areas”.
- SECTION 4. Add “The Director shall have the authority to allow replacement trees on both public and private property to meet the goals and objectives of race and social justice under Seattle’s Equity and Environment Initiative.”
- Under SMC 25.11.090 the Director has the authority to require “one or more trees” to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.
- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats and need to be considered at the beginning of the development process. The language of this SEPA code section should be included in the Director’s Rule to be certain that the code is complied with.
- SECTION 6. SDCI should adopt SDOT’s registration process and requirements to assist Tree Care Providers in complying with city code and regulations. Reduce the number of citations that will remove a Tree Care Provider from being registered with the city to no more than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor’s license to ensure they have workers’ compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

Amy Hansen

[pittle.r.us@gmail.com](mailto:pittle.r.us@gmail.com)

8 Deboer Farm Ln  
Asbury, New Jersey 08802

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**From:** Sarajane Siegfriedt <Sarajane3h@comcast.net>  
**Sent:** Saturday, August 15, 2020 4:46 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

No more delays!

It's way past time to protect what trees we have left!

This is about development, not "land division."

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
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SMC 25.11.090

- Tightening tree removal requirements for exceptional trees as hazard trees

The following changes to the draft Director's Rule are needed:

- Change Subject Title to remove words "land division" and replace with "Development"
- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."
- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as "a group of 3 or more significant trees with overlapping or touching crowns." Include street trees in groves.
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- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats and need to be considered at the beginning of the development process. The language of this SEPA code section should be included in the Director's Rule to be certain that the code is complied with.

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Thank you for protecting our urban forest.

Sarajane Siegfriedt

[Sarajane3h@comcast.net](mailto:Sarajane3h@comcast.net)

11811 33rd Ave. NE

Seattle, Washington 98125

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**From:** Mary Kennedy <info@email.actionnetwork.org>

**Sent:** Saturday, August 15, 2020 4:52 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

THE TIME FOR ACTION IS NOW. PLEASE no more delays!

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection

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Thank you for protecting our urban forest.

Mary Kennedy

[marykatkennedy@gmail.com](mailto:marykatkennedy@gmail.com)

7307 23rd Ave NW

Seattle, Washington 98117

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**From:** Susan Scanlon <scanlons4@comcast.net>

**Sent:** Saturday, August 15, 2020 5:10 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI’s Director’s Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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Trees are so important for reducing carbons and improving our air quality. They also protect our environment from erosion and maintain our land areas. They provide us with a sense of well being and healing when we see them and walk among them. Thank you for protecting our urban forest.

Susan Scanlon

[scanlons4@comcast.net](mailto:scanlons4@comcast.net)

8021 11th Ave NW

Seattle, Washington 98117

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**From:** THEANO PETERSEN <theano@comcast.net>

**Sent:** Saturday, August 15, 2020 5:27 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** PLEASE SAVE SEATTLE TREES AND ECOSYSTEM! Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Hello,

This letter has the details if you need them. I have attended many meetings of the tree protection groups over the years. Many experts and groups have come together to craft this plan. It has literally taken over a decade to even get this looked at, and while you wait, Seattle trees and green space are disappearing at a horrendous rate. Fewer trees means worse air and water quality, hotter temperatures, death to insects, birds, and our beautiful ecosystem, not to mention reduced quality of life for humans. Coronavirus restrictions have made people realize that life in tiny concrete boxes with no trees or green spaces is no good. I'm hoping now that people realize that, our trees can be saved. Please stop delaying.

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Thank you for protecting our urban forest.

Theano Petersen

THEANO PETERSEN

[theano@comcast.net](mailto:theano@comcast.net)

2552 13th Ave W

Seattle, Washington 98119

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**From:** Lindsey Heller <info@email.actionnetwork.org>  
**Sent:** Saturday, August 15, 2020 5:32 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

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The best time to plant a tree is 50 years ago. The second best time is today. Don't allow the mature trees that currently exist in Seattle to be lost through short-sightedness.

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Thank you for protecting our urban forest.

Lindsey Heller

[jadelinny@gmail.com](mailto:jadelinny@gmail.com)

20717 Hubbard Rd

Lynnwood, Washington 98036-7253

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**From:** Janet Matulia <info@email.actionnetwork.org>

**Sent:** Saturday, August 15, 2020 5:50 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

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Thank you for protecting our urban forest.

Janet Matulia

[janet.matulia@gmail.com](mailto:janet.matulia@gmail.com)

1958 Harvard Ave E, 201

SEATTLE, Washington 98102

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**From:** Lori Cohen <info@email.actionnetwork.org>  
**Sent:** Saturday, August 15, 2020 5:55 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

It is time to pass an updated tree ordinance The developers want more delay - such delay is not acceptable after over 11 years of study.

I endorse the Urban Forestry Commission's comments below. In addition, I think the Council must tighten up the loopholes that allow healthy exceptional trees to be removed. If developers can show they cannot build around an exceptional tree, it can be removed. This needs to be changes Andy given much greater scrutiny. I am aware of several projects in the City where alternatives to the development should have been considered more carefully since

exceptional trees came down for no good reason other than maximizing lot coverage or square footage of the new construction.

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements and address my concern above.

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Lori Cohen

[loricohen99@gmail.com](mailto:loricohen99@gmail.com)

1725 NE Naomi Place  
Seattle, Washington 98115

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**From:** Mia Darshan <info@email.actionnetwork.org>  
**Sent:** Saturday, August 15, 2020 6:17 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
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- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees

The following changes to the draft Director's Rule are needed:

- Change Subject Title to remove words “land division” and replace with “Development”
- PURPOSE AND BACKGROUND. add “SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city.”
- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as “a group of 3 or more significant trees with overlapping or touching crowns.” Include street trees in groves.
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Thank you for protecting our urban forest.

Mia Darshan

[miadarshan@gmail.com](mailto:miadarshan@gmail.com)

7467 Woodlawn Ave NE

Seattle, Washington 98115

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**From:** Sudarshan Rangaraj <suddy85248@gmsil.com>  
**Sent:** Saturday, August 15, 2020 6:19 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

Sudarshan Rangaraj

[suddy85248@gmsil.com](mailto:suddy85248@gmsil.com)

7467, Woodlawn Avenue ne  
Seattle, Washington 98115

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**From:** Gordon Dass Adams <info@email.actionnetwork.org>  
**Sent:** Saturday, August 15, 2020 6:56 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** , SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

This is an important issue for me. I have seen too many fine trees cut so as to squeeze more square footage onto a lot. For the many reasons you know already, that practice degrades our City. Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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Thank you for protecting our urban forest.

Gordon Dass Adams

[gordondass@yahoo.com](mailto:gordondass@yahoo.com)

PO BOX 15268  
Seattle, Washington 98115-0268

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**From:** Karen Keeley <keeley.godbout@comcast.net>  
**Sent:** Saturday, August 15, 2020 7:13 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

My neighbors and I tried to save an exceptional tree and spent thousands of dollars to no avail. STOP CLEARCUTTING Seattle and letting developers cut down magnificent trees. You are allowing an unwelcome change to our city!

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Karen Keeley

[keeley.godbout@comcast.net](mailto:keeley.godbout@comcast.net)

415 W Fulton St

Seattle, Washington 98119

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**From:** Mark MacIntyre <info@email.actionnetwork.org>

**Sent:** Saturday, August 15, 2020 7:21 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

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Thank you for protecting our urban forest. We desperately need to save what's left. Future generations are depending on our doing the right thing.

Mark MacIntyre

[mmseattleite@yahoo.com](mailto:mmseattleite@yahoo.com)

1000 Bellevue Place East #8

Seattle, Washington 98102

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**From:** Susan Balich <smb@nwlink.com>  
**Sent:** Saturday, August 15, 2020 7:33 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

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Susan Balich

[smb@nwlinc.com](mailto:smb@nwlinc.com)

331 w kinnear  
Seattle, Washington 98119

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**From:** Christa Barke <info@email.actionnetwork.org>  
**Sent:** Saturday, August 15, 2020 7:57 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

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Thank you for protecting our urban forest.

Christa Barke

[christab6@gmail.com](mailto:christab6@gmail.com)

805 - 4th Ave. N., Apt. 108

Seattle, Washington 98109

---

**From:** Rick Lee <[ricklee1@comcast.net](mailto:ricklee1@comcast.net)>  
**Sent:** Saturday, August 15, 2020 8:10 PM  
**To:** Pinto de Bader, Sandra <[Sandra.Pinto\\_de\\_Bader@Seattle.gov](mailto:Sandra.Pinto_de_Bader@Seattle.gov)>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

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- PURPOSE AND BACKGROUND. add “SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city.”
- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as “a group of 3 or more significant trees with overlapping or touching crowns.” Include street trees in groves.
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- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats and need to be considered at the beginning of the development process. The language of this SEPA code section should be included in the Director's Rule to be certain that the code is complied with.
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Thank you for protecting our urban forest.

Rick Lee

[ricklee1@comcast.net](mailto:ricklee1@comcast.net)

5210 37ave NE

Seattle, Washington 98105

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**From:** Kira Baum <info@email.actionnetwork.org>  
**Sent:** Saturday, August 15, 2020 8:24 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
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Thank you for protecting our urban forest.

Kira Baum

[baumkira@gmail.com](mailto:baumkira@gmail.com)

5449 40th Ave west

Seattle, Washington 98199

**From:** Janet Calcaterra <2004kunkcal@comcast.net>  
**Sent:** Saturday, August 15, 2020 8:26 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

Janet Calcaterra

[2004kunkcal@comcast.net](mailto:2004kunkcal@comcast.net)

2835 W Elmore St

Seattle, Washington 98199

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**From:** Tricia Sills <info@email.actionnetwork.org>  
**Sent:** Saturday, August 15, 2020 8:32 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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- Tightening tree removal requirements for exceptional trees as hazard trees

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Thank you for protecting our urban forest.

Tricia Sills

[tcell2@yahoo.com](mailto:tcell2@yahoo.com)

1743, NE 89th St

Seattle, Washington 98115

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**From:** Woody Wheeler <info@email.actionnetwork.org>

**Sent:** Saturday, August 15, 2020 8:46 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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Seattle must move forward now, without delay, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue. We have seen other issues get addressed by Council within months, if not weeks, like the sudden vote

to defund police by 50%. Yet the tree ordinance has languished going on 12 years now while destruction of Seattle's tree canopy continues. We cannot bring back the big trees we are losing. They are irreplaceable.

A city like Seattle that has signed on to the Green New Deal should understand and embrace the many benefits that trees provide, particularly in addressing climate change and absorbing CO2. And the benefits are city-wide, to every person in Seattle. More, not fewer trees need to be planted in the high-density, lower-income, more diverse areas. A city conservation corps could be engaged in the care and planting of trees. Let's move forward together as a city in this positive, intelligent, sustainable direction. We only stand to benefit.

Seattle's Urban Forestry Commission is a first-rate group of expert, dedicated tree conservationists. The city would be wise to listen to them and implement their recommendations. We are fortunate to have them. Now let's take action!

In addition to their recommendations below, I would add that the city must close the loophole that currently allows developers to remove trees, including exceptional trees so they can implement their plans to the fullest extent. From now on, their plans need to accommodate the urban forest and especially exceptional trees.

The following updates as proposed in the draft Director's Rule are great steps forward:

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Thank you for protecting our urban forest.

Woody Wheeler

[woody.wheeler@gmail.com](mailto:woody.wheeler@gmail.com)

1725 NE Naomi Place

Seattle, Washington 98115

---

**From:** Sarah Stanley <sarah-stanley@live.com>

**Sent:** Saturday, August 15, 2020 8:53 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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Sarah Stanley

[sarah-stanley@live.com](mailto:sarah-stanley@live.com)

1618 3 rd Ave W

Seattle , Washington 98119

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**From:** Kim Evans <info@email.actionnetwork.org>  
**Sent:** Saturday, August 15, 2020 9:38 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

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Kim Evans

[ktabtiang@yahoo.com](mailto:ktabtiang@yahoo.com)

3410 W Viewmont Way W

Seattle, Washington 98199

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**From:** Amber Wong <amberwong@msn.com>

**Sent:** Saturday, August 15, 2020 9:49 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

Sandra Pinto de Bader,

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- Add “All replacement trees regardless of size are protected trees and can’t be removed.”
- SECTION 2. Change the heading to “TREE PROTECTION”. Remove references to “Exceptional Trees” only and change to “Trees”. e.g., change “Exceptional Tree Protection Areas” to “Tree Protection Areas”.
- SECTION 4. Add “The Director shall have the authority to allow replacement trees on both public and private property to meet the goals and objectives of race and social justice under Seattle’s Equity and Environment Initiative.”
- Under SMC 25.11.090 the Director has the authority to require “one or more trees” to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.
- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats and need to be considered at the beginning of the development process. The language of this SEPA code section should be included in the Director’s Rule to be certain that the code is complied with.
- SECTION 6. SDCI should adopt SDOT’s registration process and requirements to assist Tree Care Providers in complying with city code and regulations. Reduce the number of citations that will remove a Tree Care Provider from being registered with the city to no more than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor’s license to ensure they have workers’ compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

Amber Wong

[amberwong@msn.com](mailto:amberwong@msn.com)

8651 Inverness Drive NE  
Seattle , Washington 98115

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**From:** Siobhan Wilder <info@email.actionnetwork.org>  
**Sent:** Saturday, August 15, 2020 9:50 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees

The following changes to the draft Director's Rule are needed:

- Change Subject Title to remove words “land division” and replace with “Development”
- PURPOSE AND BACKGROUND. add “SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city.”
- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as “a group of 3 or more significant trees with overlapping or touching crowns.” Include street trees in groves.
- Add “Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages.”
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than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor's license to ensure they have workers' compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

..Siobhan Wilder

Siobhan Wilder

[bluecrowcafe@gmail.com](mailto:bluecrowcafe@gmail.com)

1528 4th Avenue West

Seattle, Washington 98119

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**From:** Erika Flesher <eflesher@swissnet.us>

**Sent:** Saturday, August 15, 2020 9:52 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

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height (DSH) from 30 inches

- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees

The following changes to the draft Director's Rule are needed:

- Change Subject Title to remove words "land division" and replace with "Development"
- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."
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equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.

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Thank you for protecting our urban forest.

Erika Flesher

[eflesher@swissnet.us](mailto:eflesher@swissnet.us)

16611 NE 19th Pl

Bellevue, Washington 98008-2661

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**From:** shannon mcclendon <info@email.actionnetwork.org>

**Sent:** Saturday, August 15, 2020 10:28 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Urban forests function as both a heat and a carbon sink. They reduce pollution and temperatures. They provide a haven for birds and other ecosystems, as well as a place for people to go for a break from the grit, noise, and stress of the city.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

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Woodinville, and Duvall all define a tree grove as “a group of 3 or more significant trees with overlapping or touching crowns.” Include street trees in groves.

- Add “Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages.”
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Thank you for protecting our urban forest.

shannon mcclendon

[slgatsby@yahoo.com](mailto:slgatsby@yahoo.com)

9025 Burke Ave N

seattle , Washington 98103

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**From:** Kathleen Myers <info@email.actionnetwork.org>  
**Sent:** Saturday, August 15, 2020 10:44 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per

SMC 25.11.090

- Tightening tree removal requirements for exceptional trees as hazard trees

The following changes to the draft Director's Rule are needed:

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Thank you for protecting our urban forest.

Kathleen Myers

[kdm00001@gmail.com](mailto:kdm00001@gmail.com)

1336 1/2 13th Avenue South

Seattle, Washington 98144

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**From:** Francesca giambartolomei <FMGIAMBA@YAHOO.IT>

**Sent:** Saturday, August 15, 2020 10:45 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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Thank you for protecting our urban forest.

Francesca giambartolomei

[FMGIAMBA@YAHOO.IT](mailto:FMGIAMBA@YAHOO.IT)

1015 NE 105TH ST.

SEATTLE, Washington 98125

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From: Serena.Friedman@everyactioncustom.com <Serena.Friedman@everyactioncustom.com>  
Sent: Saturday, August 15, 2020 10:51 PM  
To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCI is no longer concerned about the fate of the smaller, non-exceptional trees.
- Protect red alders, black cottonwoods, and bitter cherries. These native trees provide important resources to birds and other wildlife and contribute to our sense of place in Seattle. Following the "right tree, right place" philosophy, these native trees can safely thrive and should be protected like other species.
- Expand the definition of tree groves to stands of six or more trees at least six inches in diameter, including street trees. Tree groves provide important habitat for birds and are becoming less common outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove.
- Require public notice postings on development site and online for removal of Exceptional trees, even when hazardous, to ensure community members know when and where legal tree removal is occurring.
- Require replacement for trees removed from groves and removed hazard trees.
- Align SDCI's proposed Tree Care Provider Acknowledgement with SDOT's Tree Service Provider Registration. Do not automatically renew this form annually. It should be updated each year. Reduce the number of infractions tree service providers can incur in a year before they are removed from the City's list to do business from more than three infractions to more than two infractions.
- Section 4: Preference for planting off-site replacement trees on public property is restrictive. The Director should be able to allow replacement trees not only on public property, but also on private property, where desired by the property owner, in order to meet the City's goals and objectives of race and social justice under Seattle's Equity and Environment Initiative.

The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,

Serena Friedman

23911 119th Ave SE Woodinville, WA 98077-8063 [Serena.Friedman@Frontier.COM](mailto:Serena.Friedman@Frontier.COM)

**From:** Flora Petersen <floramarina@comcast.net>  
**Sent:** Saturday, August 15, 2020 11:36 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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- Add “Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages.”
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Thank you for protecting our urban forest.

Flora Petersen

[floramarina@comcast.net](mailto:floramarina@comcast.net)

4206 NE 65th St

Seattle, Washington 98115

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**From:** Judith Bendich <jebendich@comcast.net>

**Sent:** Saturday, August 15, 2020 11:58 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per

## SMC 25.11.090

- Tightening tree removal requirements for exceptional trees as hazard trees

The following changes to the draft Director's Rule are needed:

- Change Subject Title to remove words "land division" and replace with "Development"
- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."
- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as "a group of 3 or more significant trees with overlapping or touching crowns." Include street trees in groves.
- Add "Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages."
- Add "All replacement trees regardless of size are protected trees and can't be removed."
- SECTION 2. Change the heading to "TREE PROTECTION". Remove references to "Exceptional Trees" only and change to "Trees". e.g., change "Exceptional Tree Protection Areas" to "Tree Protection Areas".
- SECTION 4. Add "The Director shall have the authority to allow replacement trees on both public and private property to meet the goals and objectives of race and social justice under Seattle's Equity and Environment Initiative."
- Under SMC 25.11.090 the Director has the authority to require "one or more trees" to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.
- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats and need to be considered at the beginning of the development process. The language of this SEPA code section should be included in the Director's Rule to be certain that the code is complied with.

- SECTION 6. SDCI should adopt SDOT's registration process and requirements to assist Tree Care Providers in complying with city code and regulations. Reduce the number of citations that will remove a Tree Care Provider from being registered with the city to no more than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor's license to ensure they have workers' compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

Judith Bendich

[jebendich@comcast.net](mailto:jebendich@comcast.net)

1754 NE 62nd St.

Seattle, Washington 98115

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**From:** Richard Ellison <climbwall@msn.com>

**Sent:** Sunday, August 16, 2020 12:48 AM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Stop allowing developers to cut down Seattle's remaining tree. The City has been promising to update the Tree Ordinance for decades, kicking the can down the road. This update of the Director's Rule will be a positive step forward.

Building affordable housing does not require cutting all the trees down! Build taller, not lot line to lot line, with the excuse every inch of open space must be concrete. Save the open space, save the trees, build taller with creative designs. Put the square footage into the sky, with big trees and open space for people to play in and old people to sit in. Where are the kids going to play? Must the new Seattle look like a concrete and steel and glass hothouse? Its gonna be record hot temperatures and the City is allowing all the trees to be cut through ignorance and greed and stupidity. Stop the loss of our limited tree scape. Plant more, preserve more open space, make more open space, don't ClearCut Seattle!

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
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certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

Richard Ellison

[climbwall@msn.com](mailto:climbwall@msn.com)

8003 28th Ave NE

Seattle, Washington 98115

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**From:** rebeccagroovypeace@gmail.com <info@email.actionnetwork.org>

**Sent:** Sunday, August 16, 2020 3:47 AM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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Transportation already requires

- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
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- Tightening tree removal requirements for exceptional trees as hazard trees

The following changes to the draft Director’s Rule are needed:

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- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats

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Thank you for protecting our urban forest.

[rebeccagroovypeace@gmail.com](mailto:rebeccagroovypeace@gmail.com)

11589 Martin Rd

Rockport, Washington 98283

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**From:** Gayle Janzen <cgjanzen@comcast.net>

**Sent:** Sunday, August 16, 2020 6:12 AM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** I Urge You to adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

I'm asking you to adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements. It's long past time to move forward with updating Seattle's tree ordinance that currently is allowing way too many of our old growth trees to be clear cut by developers. We desperately need to be saving as many tall trees as

we can as they are the ones that we need to combat climate chaos. Planting replacement trees is of course a step in the right direction, but it takes 50 years for them to be able to absorb the amount of CO2 that exceptional trees are now providing for us, free of charge. We are all so tired of seeing so many trees being cut down to be replaced by mega houses. We can have development without cutting down so many trees if more thought is put into the planning process. As it is now, trees appear to be nothing more than irritants standing in the way of developers' profits. That attitude needs to change.

Therefore, Seattle needs to move forward now, WITHOUT the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue!! How many magnificent trees have we lost during those 11 years???

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development MUST be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees

I urge you to consider the following important changes to the draft Director's Rule:

- Change Subject Title to remove words "land division" and replace with "Development"
- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."
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Woodinville, and Duvall all define a tree grove as “a group of 3 or more significant trees with overlapping or touching crowns.” Include street trees in groves.

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specific work being done. The newly planted trees also need to be maintained to make sure they remain healthy.

Our trees make the city more livable and add so much beauty to our lives. Please protect them.

Gayle Janzen

[cgianzen@comcast.net](mailto:cgianzen@comcast.net)

11232 Dayton Ave N

Seattle, Washington 98133

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**From:** William Waldman <wwaldmanmd@erols.com>  
**Sent:** Sunday, August 16, 2020 7:41 AM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

William Waldman

[wwaldmanmd@erols.com](mailto:wwaldmanmd@erols.com)

3701 S. Hudson St. #526

Seattle, Washington 98118

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**From:** Tony Hacker <info@email.actionnetwork.org>  
**Sent:** Sunday, August 16, 2020 9:04 AM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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Again, as a citizen who has dealt directly with these issues in our Madison Valley neighborhood, I urge you to adopt these crucial protections for our rapidly dwindling tree canopy. The adoption of Director's Rule 13-2020 with the above proposed amendments is the best opportunity our city has had to begin to return Seattle to being the green city it once was: green with trees not developers' money. Thank you.

Respectfully submitted,  
Tony Hacker - Save Madison Valley

Tony Hacker  
[tonyhackerphd@gmail.com](mailto:tonyhackerphd@gmail.com)

515 30th Ave E  
Seattle, Washington 98112

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**From:** Kristin McDonell <info@email.actionnetwork.org>  
**Sent:** Sunday, August 16, 2020 9:06 AM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Seattle must protect its cherished urban forest now. In addition to creating a aesthetically pleasing environment and a source of pride for neighborhoods with historic trees, trees contribute to their environment by providing oxygen, improving air quality, climate amelioration, conserving water, preserving soil, and supporting wildlife. I strongly urge you to adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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Thank you for protecting our urban forest.

Kristin McDonell

[klmcdonell@gmail.com](mailto:klmcdonell@gmail.com)

3232 37th Place S

SEATTLE, Washington 98144

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**From:** Atticus Lee <info@email.actionnetwork.org>  
**Sent:** Sunday, August 16, 2020 9:06 AM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long

overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees

The following changes to the draft Director's Rule are needed:

- Change Subject Title to remove words "land division" and replace with "Development"
- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."
- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as "a group of 3 or more significant trees with overlapping or touching crowns." Include street trees in groves.
- Add "Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages."
- Add "All replacement trees regardless of size are protected trees and can't be removed."
- SECTION 2. Change the heading to "TREE PROTECTION". Remove references to "Exceptional Trees" only and change to "Trees". e.g., change "Exceptional Tree Protection Areas" to "Tree Protection Areas".
- SECTION 4. Add "The Director shall have the authority to allow replacement trees on both public and private property to meet the goals and objectives of race and social justice under Seattle's Equity and Environment Initiative."

- Under SMC 25.11.090 the Director has the authority to require “one or more trees” to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.
- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats and need to be considered at the beginning of the development process. The language of this SEPA code section should be included in the Director’s Rule to be certain that the code is complied with.
- SECTION 6. SDCI should adopt SDOT’s registration process and requirements to assist Tree Care Providers in complying with city code and regulations. Reduce the number of citations that will remove a Tree Care Provider from being registered with the city to no more than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor’s license to ensure they have workers’ compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

Atticus Lee

[atticusearth@icloud.com](mailto:atticusearth@icloud.com)

17 N Garden Street

Boise, Cordoba 83706

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**From:** Emily McLuen <em@spanishcaravan.com>

**Sent:** Sunday, August 16, 2020 9:12 AM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI’s Director’s Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

Emily McLuen

[em@spanishcaravan.com](mailto:em@spanishcaravan.com)

7544 Sunnyside Ave N  
Seattle, Washington 98103

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**From:** Alan Muller <info@email.actionnetwork.org>  
**Sent:** Sunday, August 16, 2020 10:01 AM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

Alan Muller

[venerablelekshay@gmail.com](mailto:venerablelekshay@gmail.com)

609 Yesler Way, Apt 2-206

Seattle, Washington 98104-3722

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From: kbeardshear@everyactioncustom.com <kbeardshear@everyactioncustom.com>

Sent: Sunday, August 16, 2020 10:01 AM

To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCI is no longer concerned about the fate of the smaller, non-exceptional trees.
- Protect red alders, black cottonwoods, and bitter cherries. These native trees provide important resources to birds and other wildlife and contribute to our sense of place in Seattle. Following the "right

tree, right place" philosophy, these native trees can safely thrive and should be protected like other species.

- Expand the definition of tree groves to stands of six or more trees at least six inches in diameter, including street trees. Tree groves provide important habitat for birds and are becoming less common outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove.
- Require public notice postings on development site and online for removal of Exceptional trees, even when hazardous, to ensure community members know when and where legal tree removal is occurring.
- Require replacement for trees removed from groves and removed hazard trees.
- Align SDCI's proposed Tree Care Provider Acknowledgement with SDOT's Tree Service Provider Registration. Do not automatically renew this form annually. It should be updated each year. Reduce the number of infractions tree service providers can incur in a year before they are removed from the City's list to do business from more than three infractions to more than two infractions.
- Section 4: Preference for planting off-site replacement trees on public property is restrictive. The Director should be able to allow replacement trees not only on public property, but also on private property, where desired by the property owner, in order to meet the City's goals and objectives of race and social justice under Seattle's Equity and Environment Initiative.

The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
Kristi Bierut  
133 NW 173rd St Shoreline, WA 98177-3614 [kbeardshear@gmail.com](mailto:kbeardshear@gmail.com)

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**From:** Katherine Kaskel <[info@email.actionnetwork.org](mailto:info@email.actionnetwork.org)>

**Sent:** Sunday, August 16, 2020 10:38 AM

**To:** Pinto de Bader, Sandra <[Sandra.Pinto\\_de\\_Bader@Seattle.gov](mailto:Sandra.Pinto_de_Bader@Seattle.gov)>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

Katherine Kaskel

[kscopy@hotmail.com](mailto:kscopy@hotmail.com)

7450 E. Green Lake Dr. N.

Seattle , Washington 98115

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**From:** Frances Williams <info@email.actionnetwork.org>

**Sent:** Sunday, August 16, 2020 10:41 AM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI’s Director’s Rule 13-2020

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

Frances Williams

[francescababy874@gmail.com](mailto:francescababy874@gmail.com)

4310 36th Ave W  
Seattle, Washington 98199

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**From:** Bernice Maslan <info@email.actionnetwork.org>  
**Sent:** Sunday, August 16, 2020 10:48 AM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** PLEASE adopt, with amendments, SDCI's Director's Rule 13-2020!

**CAUTION: External Email**

Sandra Pinto de Bader,

Thank you for acting on this promptly. Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. All delays result in fewer trees in our neighborhoods. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

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Thank you for protecting our urban forest!

Bernice Maslan

[bmaslan08@gmail.com](mailto:bmaslan08@gmail.com)

9705 1st Ave NW

Seattle, Washington 98117

---

**From:** LISA BAUER <info@email.actionnetwork.org>  
**Sent:** Sunday, August 16, 2020 11:22 AM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

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- SECTION 4. Add “The Director shall have the authority to allow replacement trees on both public and private property to meet the goals and objectives of race and social justice under Seattle’s Equity and Environment Initiative.”
- Under SMC 25.11.090 the Director has the authority to require “one or more trees” to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of

the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.

- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats and need to be considered at the beginning of the development process. The language of this SEPA code section should be included in the Director's Rule to be certain that the code is complied with.
- SECTION 6. SDCI should adopt SDOT's registration process and requirements to assist Tree Care Providers in complying with city code and regulations. Reduce the number of citations that will remove a Tree Care Provider from being registered with the city to no more than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor's license to ensure they have workers' compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

LISA BAUER

[lisa.bingbong@gmail.com](mailto:lisa.bingbong@gmail.com)

6826 49th ave. NE

Seattle, Washington 98115

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**From:** Ed Mast <info@email.actionnetwork.org>

**Sent:** Sunday, August 16, 2020 11:36 AM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Save Our Trees!

**CAUTION: External Email**

Sandra Pinto de Bader,

Seattle's trees and urban forest are vital to keeping our city healthy and livable. Trees and the urban forest comprise a vital green infrastructure. Trees reduce air pollution, storm water runoff and climate impacts like heat island effects, while providing essential habitat for birds and other wildlife. They are important for the physical and mental health of our residents.

Seattle's rapid growth and an outdated tree ordinance are reducing these beneficial effects as trees are removed and not replaced. It is urgent to act now to stop this continued loss of trees, particularly large mature trees and tree groves. It is important to promote environmental equity as trees are replaced.

Please update Seattle's Tree Protection Ordinance as recommended in the latest draft by the Seattle Urban Forestry Commission.

Here are the key provisions that need to be in the updated tree ordinance:

1. Expand the existing Tree Removal and Replacement Permit Program, including 2-week public notice and posting on-site, as used by the Seattle Department of Transportation (SDOT) – to cover all Significant Trees (6" and larger diameter at breast height (DBH)) on private property in all land use zones, both during development and outside development.
2. Require the replacement of all Significant trees removed with trees that in 25 years will reach equivalent canopy volume – either on site or pay a replacement fee into a City Tree Replacement and Preservation Fund. Allow the Fund to also accept fines, donations, grants and set up easements.
3. Retain current protections for Exceptional Trees and reduce the upper threshold for Exceptional Trees to 24" DBH, protect tree groves and prohibit Significant Trees being removed on undeveloped lots.
4. Allow removal of no more than 2 Significant non-Exceptional Trees in 3 years per lot outside development
5. Establish one citywide database for applying for Tree Removal and Replacement Permits and to track changes in the tree canopy.
6. Post online all permit requests and permit approvals for public viewing.
7. Expand SDOT's existing tree service provider's registration and certification to register all Tree Service Providers (arborists) working on trees in Seattle.
8. Provide adequate funding in the budget to implement and enforce the updated ordinance.

Ed Mast

[edmast1@gmail.com](mailto:edmast1@gmail.com)

Seattle

Seattle, Washington 98107

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**From:** Markus Volke <info@email.actionnetwork.org>

**Sent:** Sunday, August 16, 2020 11:49 AM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090

- Tightening tree removal requirements for exceptional trees as hazard trees

The following changes to the draft Director's Rule are needed:

- Change Subject Title to remove words "land division" and replace with "Development"
- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."
- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as "a group of 3 or more significant trees with overlapping or touching crowns." Include street trees in groves.
- Add "Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages."
- Add "All replacement trees regardless of size are protected trees and can't be removed."
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- SECTION 4. Add "The Director shall have the authority to allow replacement trees on both public and private property to meet the goals and objectives of race and social justice under Seattle's Equity and Environment Initiative."
- Under SMC 25.11.090 the Director has the authority to require "one or more trees" to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.
- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats and need to be considered at the beginning of the development process. The language of this SEPA code section should be included in the Director's Rule to be certain that the code is complied with.
- SECTION 6. SDCI should adopt SDOT's registration process and requirements to assist

Tree Care Providers in complying with city code and regulations. Reduce the number of citations that will remove a Tree Care Provider from being registered with the city to no more than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor's license to ensure they have workers' compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest. We need to keep and nurture our trees!

Regards,  
Markus Volke

Markus Volke  
[volke99@gmail.com](mailto:volke99@gmail.com)  
11331 36TH AVE NE  
SEATTLE, Washington 98125

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**From:** Ping Shen <zs58@cornell.edu>  
**Sent:** Sunday, August 16, 2020 12:01 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

The respect and care with which we treat our trees is representative of the respect and care with which we treat everything else around us - our waters, our land, ourselves. Let's help

preserve what we can of these magnificent creatures that provide so much for us humans and upon whom we have already wreaked so much devastation. For us, for your kids, for my kids, for their kids - please adopt this rule and its amendments. Thank you.

Ping Shen

Ping Shen

[zs58@cornell.edu](mailto:zs58@cornell.edu)

2717 Western Ave #1114

Seattle, Washington 98121

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**From:** diana herbst <info@email.actionnetwork.org>  
**Sent:** Sunday, August 16, 2020 12:02 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

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- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process

- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees

The following changes to the draft Director’s Rule are needed:

- Change Subject Title to remove words “land division” and replace with “Development”
- PURPOSE AND BACKGROUND. add “SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city.”
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- Add “Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages.”
- Add “All replacement trees regardless of size are protected trees and can’t be removed.”
- SECTION 2. Change the heading to “TREE PROTECTION”. Remove references to “Exceptional Trees” only and change to “Trees”. e.g., change “Exceptional Tree Protection Areas” to “Tree Protection Areas”.
- SECTION 4. Add “The Director shall have the authority to allow replacement trees on both public and private property to meet the goals and objectives of race and social justice under Seattle’s Equity and Environment Initiative.”
- Under SMC 25.11.090 the Director has the authority to require “one or more trees” to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are

removed during development.

- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats and need to be considered at the beginning of the development process. The language of this SEPA code section should be included in the Director's Rule to be certain that the code is complied with.
- SECTION 6. SDCI should adopt SDOT's registration process and requirements to assist Tree Care Providers in complying with city code and regulations. Reduce the number of citations that will remove a Tree Care Provider from being registered with the city to no more than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor's license to ensure they have workers' compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

diana herbst

[smilesdancing4u@yahoo.com](mailto:smilesdancing4u@yahoo.com)

14705 30th Ave NE

shoreline, Washington 98155

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**From:** Aellaheh zare <info@email.actionnetwork.org>  
**Sent:** Sunday, August 16, 2020 12:03 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division,

including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

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- Tightening tree removal requirements for exceptional trees as hazard trees

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- Change Subject Title to remove words "land division" and replace with "Development"
- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."
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- Add "Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages."
- Add "All replacement trees regardless of size are protected trees and can't be removed."
- SECTION 2. Change the heading to "TREE PROTECTION". Remove references to "Exceptional Trees" only and change to "Trees". e.g., change "Exceptional Tree Protection

Areas” to ”Tree Protection Areas”.

- SECTION 4. Add “The Director shall have the authority to allow replacement trees on both public and private property to meet the goals and objectives of race and social justice under Seattle’s Equity and Environment Initiative.”
- Under SMC 25.11.090 the Director has the authority to require “one or more trees” to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.
- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats and need to be considered at the beginning of the development process. The language of this SEPA code section should be included in the Director’s Rule to be certain that the code is complied with.
- SECTION 6. SDCI should adopt SDOT’s registration process and requirements to assist Tree Care Providers in complying with city code and regulations. Reduce the number of citations that will remove a Tree Care Provider from being registered with the city to no more than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor’s license to ensure they have workers’ compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

Aellaheh zare

[elahe.gzk@gmail.com](mailto:elahe.gzk@gmail.com)

5409 Denver Ave s

Seattle , Washington 98108

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From: karenkunde@everyactioncustom.com <karenkunde@everyactioncustom.com>

Sent: Sunday, August 16, 2020 12:06 PM

To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest matters to me. Trees provide essential services to people and support over 100 local bird species. King County recently celebrated planting 1 million trees. The city should work in harmony with the county in making trees a priority. We will not successfully combat climate change or improve the resiliency of our watershed and fish without urgent protection of the remaining trees.

I attended design review meetings for some of the most damaging projects within Piper's Creek watershed and have realized how woefully inadequate our tree protections are. This includes a project at 9712 Seventh Avenue NW which will remove all trees. The development at 10420 and 10422 105th Street NW atop a steep ravine above Piper's Creek at the border of Carkeek Park should never have occurred without trees that would help prevent harmful runoff. The boards reviewing these projects do not have any objectives other than helping the developer. There needs to be a better balance of people and interests.

Director's Rule 13-2020 offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCI is no longer concerned about the fate of the smaller, non-exceptional trees.
- Protect red alders, black cottonwoods, and bitter cherries. These native trees provide important resources to birds and other wildlife and contribute to our sense of place in Seattle. Following the "right tree, right place" philosophy, these native trees can safely thrive and should be protected like other species.
- Expand the definition of tree groves to stands of six or more trees at least six inches in diameter, including street trees. Tree groves provide important habitat for birds and are becoming less common outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove.
- Require public notice postings on development site and online for removal of Exceptional trees, even when hazardous, to ensure community members know when and where legal tree removal is occurring.
- Require replacement for trees removed from groves and removed hazard trees.

- Align SDCI's proposed Tree Care Provider Acknowledgement with SDOT's Tree Service Provider Registration. Do not automatically renew this form annually. It should be updated each year. Reduce the number of infractions tree service providers can incur in a year before they are removed from the City's list to do business from more than three infractions to more than two infractions.
- Section 4: Preference for planting off-site replacement trees on public property is restrictive. The Director should be able to allow replacement trees not only on public property, but also on private property, where desired by the property owner, in order to meet the City's goals and objectives of race and social justice under Seattle's Equity and Environment Initiative.

The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
Karen Kunde  
9718 6th Ave NW Seattle, WA 98117-2023  
karenkunde@comcast.net

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**From:** Jill Milstid <info@email.actionnetwork.org>  
**Sent:** Sunday, August 16, 2020 12:08 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

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- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process

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- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees

The following changes to the draft Director’s Rule are needed:

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- PURPOSE AND BACKGROUND. add “SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city.”
- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as “a group of 3 or more significant trees with overlapping or touching crowns.” Include street trees in groves.
- Add “Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages.”
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- SECTION 2. Change the heading to “TREE PROTECTION”. Remove references to “Exceptional Trees” only and change to “Trees”. e.g., change “Exceptional Tree Protection Areas” to “Tree Protection Areas”.
- SECTION 4. Add “The Director shall have the authority to allow replacement trees on both public and private property to meet the goals and objectives of race and social justice under Seattle’s Equity and Environment Initiative.”
- Under SMC 25.11.090 the Director has the authority to require “one or more trees” to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are

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- SECTION 6. SDCI should adopt SDOT's registration process and requirements to assist Tree Care Providers in complying with city code and regulations. Reduce the number of citations that will remove a Tree Care Provider from being registered with the city to no more than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor's license to ensure they have workers' compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

Jill Milstid

[milstidjoy@yahoo.com](mailto:milstidjoy@yahoo.com)

12420 23rd Ave S

Burien, Washington 98168

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**From:** Julian Adams <JulianPAdams@Hotmail.com>  
**Sent:** Sunday, August 16, 2020 12:10 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please Update Seattle's Tree Ordinance

**CAUTION: External Email**

Sandra Pinto de Bader,

Seattle's trees and urban forest are vital to keeping our city healthy and livable. Trees and the urban forest comprise a vital green infrastructure. Trees reduce air pollution, storm water

runoff and climate impacts like heat island effects, while providing essential habitat for birds and other wildlife. They are important for the physical and mental health of our residents.

Seattle's rapid growth and an outdated tree ordinance are reducing these beneficial effects as trees are removed and not replaced. It is urgent to act now to stop this continued loss of trees, particularly large mature trees and tree groves. It is important to promote environmental equity as trees are replaced.

Please update Seattle's Tree Protection Ordinance as recommended in the latest draft by the Seattle Urban Forestry Commission.

Here are the key provisions that need to be in the updated tree ordinance:

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2. Require the replacement of all Significant Trees removed with trees that in 25 years will reach equivalent canopy volume – either on site or pay a replacement fee into a City Tree Replacement and Preservation Fund. Allow the Fund to also accept fines, donations, grants and set up easements.
3. Retain current protections for Exceptional Trees and reduce the upper threshold for Exceptional Trees to 24" DBH, protect tree groves and prohibit Significant Trees being removed on undeveloped lots.
4. Allow removal of no more than 2 Significant non-Exceptional Trees in 3 years per lot outside development
5. Establish one citywide database for applying for Tree Removal and Replacement Permits and to track changes in the tree canopy.
6. Post online all permit requests and permit approvals for public viewing.
7. Expand SDOT's existing tree service provider's registration and certification to register all Tree Service Providers (arborists) working on trees in Seattle.
8. Provide adequate funding in the budget to implement and enforce the updated ordinance.

Julian Adams

[JulianPAdams@Hotmail.com](mailto:JulianPAdams@Hotmail.com)

6735 5th Ave NE  
Seattle, Washington 98115

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**From:** Dinah Coble <info@email.actionnetwork.org>  
**Sent:** Sunday, August 16, 2020 12:13 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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- SECTION 2. Change the heading to “TREE PROTECTION”. Remove references to “Exceptional Trees” only and change to “Trees”. e.g., change “Exceptional Tree Protection Areas” to “Tree Protection Areas”.
- SECTION 4. Add “The Director shall have the authority to allow replacement trees on both public and private property to meet the goals and objectives of race and social justice under Seattle’s Equity and Environment Initiative.”
- Under SMC 25.11.090 the Director has the authority to require “one or more trees” to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.
- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats and need to be considered at the beginning of the development process. The language of this SEPA code section should be included in the Director’s Rule to be certain that the code is complied with.
- SECTION 6. SDCI should adopt SDOT’s registration process and requirements to assist Tree Care Providers in complying with city code and regulations. Reduce the number of citations that will remove a Tree Care Provider from being registered with the city to no more

than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor's license to ensure they have workers' compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

Dinah Coble

[dinahross@mac.com](mailto:dinahross@mac.com)

8533 31st Ave NW

Seattle, Washington 98117

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**From:** Heidi Siegelbaum <Heidi@calyxsite.com>

**Sent:** Sunday, August 16, 2020 12:48 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 – Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

You have delayed action on this Rule for an unacceptable period of time and there is no reason to delay. You should follow the advice of your experts, the Urban Forestry Commission. Particularly now at a time of COVID where people are spending more time outside and where climate change can be mitigated in part by green infrastructure including LARGE trees as part of our public health infrastructure, you really have an incumbent duty to pass this now.

Seattle must move forward now, without the delay urged by some for political and spurious

reasons, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue. You are violating your public trust obligations.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches (in our opinion even 24 inches is too generous- should be 18 inches really)
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees

The following changes to the draft Director's Rule are needed:

- Change Subject Title to remove words "land division" and replace with "Development"
- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."
- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as "a group of 3 or more significant trees with overlapping or touching crowns." Include street trees in groves.
- Add "Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages."
- Add "All replacement trees regardless of size are protected trees and can't be removed."
- SECTION 2. Change the heading to "TREE PROTECTION". Remove references to "Exceptional Trees" only and change to "Trees". e.g., change "Exceptional Tree Protection Areas" to "Tree Protection Areas".

- SECTION 4. Add “The Director shall have the authority to allow replacement trees on both public and private property to meet the goals and objectives of race and social justice under Seattle’s Equity and Environment Initiative.”
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- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats and need to be considered at the beginning of the development process. The language of this SEPA code section should be included in the Director’s Rule to be certain that the code is complied with.
- SECTION 6. SDCI should adopt SDOT’s registration process and requirements to assist Tree Care Providers in complying with city code and regulations. Reduce the number of citations that will remove a Tree Care Provider from being registered with the city to no more than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor’s license to ensure they have workers’ compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for finally taking action and doing something to protect mature trees when we are facing an existential public health and climate crisis.

Sincerely,  
Heidi Siegelbaum and Rob Hyman  
3018 NW 85th Street, Seattle, WA. 98117

Heidi Siegelbaum  
[Heidi@calyxsite.com](mailto:Heidi@calyxsite.com)  
3018 NW 85th Street Apartment 5  
Seattle, Washington 98117

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**From:** Kenneth Chilcoat <info@email.actionnetwork.org>  
**Sent:** Sunday, August 16, 2020 12:50 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
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- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees

The following changes to the draft Director's Rule are needed:

- Change Subject Title to remove words "land division" and replace with "Development"
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- Add “Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages.”
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certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

Kenneth Chilcoat

[krchilcoat@gmail.com](mailto:krchilcoat@gmail.com)

23406 48th Ave W

Mountlake Terrace, Washington 98043

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**From:** Gerilyn Denny <info@email.actionnetwork.org>  
**Sent:** Sunday, August 16, 2020 12:57 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires

- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090

- Tightening tree removal requirements for exceptional trees as hazard trees

The following changes to the draft Director’s Rule are needed:

- Change Subject Title to remove words “land division” and replace with “Development”
- PURPOSE AND BACKGROUND. add “SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city.”
- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as “a group of 3 or more significant trees with overlapping or touching crowns.” Include street trees in groves.
- Add “Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages.”
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- SECTION 2. Change the heading to “TREE PROTECTION”. Remove references to “Exceptional Trees” only and change to “Trees”. e.g., change “Exceptional Tree Protection Areas” to “Tree Protection Areas”.
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- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats

and need to be considered at the beginning of the development process. The language of this SEPA code section should be included in the Director's Rule to be certain that the code is complied with.

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Thank you for protecting our urban forest.

Gerilyn Denny

[gerilyndenny1@gmail.com](mailto:gerilyndenny1@gmail.com)

1800 S Jackson St #205

Seattle, Washington 98144

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**From:** pkarovsky@yahoo.com <info@email.actionnetwork.org>  
**Sent:** Sunday, August 16, 2020 1:18 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated

Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees

The following changes to the draft Director's Rule are needed:

- Change Subject Title to remove words "land division" and replace with "Development"
- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."
- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as "a group of 3 or more significant trees with overlapping or touching crowns." Include street trees in groves.
- Add "Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages."
- Add "All replacement trees regardless of size are protected trees and can't be removed."
- SECTION 2. Change the heading to "TREE PROTECTION". Remove references to "Exceptional Trees" only and change to "Trees". e.g., change "Exceptional Tree Protection Areas" to "Tree Protection Areas".
- SECTION 4. Add "The Director shall have the authority to allow replacement trees on both

public and private property to meet the goals and objectives of race and social justice under Seattle's Equity and Environment Initiative."

- Under SMC 25.11.090 the Director has the authority to require "one or more trees" to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.
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Thank you for protecting our urban forest.

[pkarovsky@yahoo.com](mailto:pkarovsky@yahoo.com)

533 30th ave E

Seattle, Washington 98112-4204

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**From:** Glenn Bristol <info@email.actionnetwork.org>

**Sent:** Sunday, August 16, 2020 1:32 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Dear SUFC Commissioners,

I have been a Seattle resident since 2009, and I have seen firsthand how well the existing tree protection rules are enforced by SDOT on its own projects, and the significant laxity or willful ignorance when it comes to private development projects, which do not take these rules seriously, and are happy to clear away trees even in violation. Their flouting of the law needs to stop today. We need to strengthen these rules immediately, and provide funding for rigorous enforcement.

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

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- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees

The following changes to the draft Director's Rule are needed:

- Change Subject Title to remove words "land division" and replace with "Development"
- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process,

and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city.”

- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as “a group of 3 or more significant trees with overlapping or touching crowns.” Include street trees in groves.
- Add “Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages.”
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city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

Glenn Bristol

[glennbristol@outlook.com](mailto:glennbristol@outlook.com)

729 23rd Ave, Lower Unit

Seattle, WA, Washington 98222

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**From:** Angela Crouch <angelina4242@comcast.net>  
**Sent:** Sunday, August 16, 2020 1:32 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

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- Requiring Tree Care Providers to register with the City as the Seattle Dept. of

Transportation already requires

- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
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The following changes to the draft Director's Rule are needed:

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Thank you for protecting our urban forest.

Angela Crouch

[angelina4242@comcast.net](mailto:angelina4242@comcast.net)

2500 Montavista PI W

Seattle, Washington 98199

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**From:** jack Bautsch <jbautsch@comcast.net>

**Sent:** Sunday, August 16, 2020 1:33 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Urban tree canopy is so important to our physical, psychological, emotional health as individuals and as a community, and we are losing it at an alarming and depressing rate! We have tried for over a decade to strengthen Seattle's Tree Ordinance. Now is the time to take

some action! Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

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- Under SMC 25.11.090 the Director has the authority to require “one or more trees” to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.
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Thank you for protecting our urban forest.

jack Bautsch

[jbautsch@comcast.net](mailto:jbautsch@comcast.net)

1112 nw 83rd street

seattle, Washington 98117

**From:** Rea Facer <info@email.actionnetwork.org>  
**Sent:** Sunday, August 16, 2020 1:35 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees

The following changes to the draft Director's Rule are needed:

- Change Subject Title to remove words "land division" and replace with "Development"
- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."
- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland,

Woodinville, and Duvall all define a tree grove as “a group of 3 or more significant trees with overlapping or touching crowns.” Include street trees in groves.

- Add “Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages.”
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Thank you for protecting our urban forest.

Rea Facer

[reaxanf@gmail.com](mailto:reaxanf@gmail.com)

2850 Northwest 56th Street

Seattle, Washington 98107

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**From:** Katrina Spade <info@email.actionnetwork.org>  
**Sent:** Sunday, August 16, 2020 1:47 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

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SMC 25.11.090

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Thank you for protecting our urban forest.

Katrina Spade

[katrinaspade@gmail.com](mailto:katrinaspade@gmail.com)

202 13th Avenue East

Seattle, Washington 98102

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**From:** Richard Nicol <rlnicol@msn.com>

**Sent:** Sunday, August 16, 2020 1:51 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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This pandemic has made it clear that our priorities as a society must change. We need to start caring for one another and also to protect the natural world we all share on this planet. Nature, and especially our trees, are a great solace for the massive loss and sorrow that we are currently suffering. Please act to preserve our beautiful trees which are always a source of comfort and now more than ever. Developers should be willing to forego some profit to make the world a better place for all of us, also for them. Every square foot of property need not be ravaged for a few extra dollars. Please adopt Director's Rule 13-2020 immediately. Do not wait until many more of our magnificent trees are lost.

Respectfully and urgently submitted. Richard Nicol in Ballard

Thank you for protecting our urban forest.

Richard Nicol

[rnicol@msn.com](mailto:rnicol@msn.com)

1414 Northwest 62nd Street  
Seattle, Washington 98107

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**From:** Jane Nichols <janenic@earthlink.net>  
**Sent:** Sunday, August 16, 2020 1:55 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

Jane Nichols

[janenic@earthlink.net](mailto:janenic@earthlink.net)

191 35th Ave E

Seattle, Washington 98112

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**From:** Ellen Hale <us\_chickens@earthlink.net>

**Sent:** Sunday, August 16, 2020 2:02 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

I am writing to agree heartily with the many tree advocates making this request of the city council. Today, as temperatures rise into the 90's, the cooling role of trees is unmistakable. Cities less 'green' than our Emerald City protect their carbon-storing, bird and beast hosting, rain filtering, soul restoring, soil opening, air purifying things of beauty. We must act now to protect what trees remain — rather than regret their loss later. I have read the ordinance and urge it's passage. I support it for the reasons below.

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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Thank you for protecting our urban forest.

Ellen Hale

[us\\_chickens@earthlink.net](mailto:us_chickens@earthlink.net)

13740 19th Ave NE

Seattle, Washington 98125

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From: [maggieb180@everyactioncustom.com](mailto:maggieb180@everyactioncustom.com) <[maggieb180@everyactioncustom.com](mailto:maggieb180@everyactioncustom.com)>

Sent: Sunday, August 16, 2020 2:05 PM

To: Pinto de Bader, Sandra <[Sandra.Pinto\\_de\\_Bader@Seattle.gov](mailto:Sandra.Pinto_de_Bader@Seattle.gov)>

Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city. I am also a volunteer forest steward for Green Seattle Partnership in Magnuson Park. I have spent the last eight years doing ecological restoration to help native plants reestablish in one of our lovely city parks.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCI is no longer concerned about the fate of the smaller, non-exceptional trees.
- Protect red alders, black cottonwoods, and bitter cherries. These native trees provide important resources to birds and other wildlife and contribute to our sense of place in Seattle. Following the "right tree, right place" philosophy, these native trees can safely thrive and should be protected like other species.
- Expand the definition of tree groves to stands of six or more trees at least six inches in diameter, including street trees. Tree groves provide important habitat for birds and are becoming less common outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove.
- Require public notice postings on development site and online for removal of Exceptional trees, even when hazardous, to ensure community members know when and where legal tree removal is occurring.
- Require replacement for trees removed from groves and removed hazard trees.
- Align SDCI's proposed Tree Care Provider Acknowledgement with SDOT's Tree Service Provider Registration. Do not automatically renew this form annually. It should be updated each year. Reduce the number of infractions tree service providers can incur in a year before they are removed from the City's list to do business from more than three infractions to more than two infractions.
- Section 4: Preference for planting off-site replacement trees on public property is restrictive. The Director should be able to allow replacement trees not only on public property, but also on private property, where desired by the property owner, in order to meet the City's goals and objectives of race and social justice under Seattle's Equity and Environment Initiative.

The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Each one is so precious!! Please do not let any more vanish from our city. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
Barbara Broderick  
3911 NE 82nd St Seattle, WA 98115-4941  
[maggieb180@comcast.net](mailto:maggieb180@comcast.net)

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**From:** Susan Niemann <info@email.actionnetwork.org>  
**Sent:** Sunday, August 16, 2020 2:19 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

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than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor's license to ensure they have workers' compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

Susan

Susan Niemann

[seniemann@gmail.com](mailto:seniemann@gmail.com)

8843 28th Ave nw

Seattle, Washington 98117

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**From:** Sarah Trethewey <info@email.actionnetwork.org>

**Sent:** Sunday, August 16, 2020 2:23 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard

height (DSH) from 30 inches

- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees

The following changes to the draft Director's Rule are needed:

- Change Subject Title to remove words "land division" and replace with "Development"
- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."
- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as "a group of 3 or more significant trees with overlapping or touching crowns." Include street trees in groves.
- Add "Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages."
- Add "All replacement trees regardless of size are protected trees and can't be removed."
- SECTION 2. Change the heading to "TREE PROTECTION". Remove references to "Exceptional Trees" only and change to "Trees". e.g., change "Exceptional Tree Protection Areas" to "Tree Protection Areas".
- SECTION 4. Add "The Director shall have the authority to allow replacement trees on both public and private property to meet the goals and objectives of race and social justice under Seattle's Equity and Environment Initiative."
- Under SMC 25.11.090 the Director has the authority to require "one or more trees" to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve

equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.

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Thank you for protecting our urban forest.

Sarah Trethewey

[sarahbtrethewey@gmail.com](mailto:sarahbtrethewey@gmail.com)

530 30th Ave E

Seattle, Washington 98112

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**From:** Janet Way <info@email.actionnetwork.org>

**Sent:** Sunday, August 16, 2020 2:40 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Janet M Way  
940 NE 147th St  
Shoreline, WA 98155

August 16, 2020

Nathan Torgelson,  
Director Seattle Department of Construction and Inspections (SDCI)  
700 5th Ave  
Seattle, WA 98124

RE: Urban Forestry Commission (UFC) comments on SDCI Director's Rule 13-2020

Dear Mr Torgelson:

Please accept my comments regarding the SDCI Director's Rule, 13-2020.

I am writing as a Tree Advocate, a member of the TreePAC Board, and an active Sierra Club member (Vice-Chair of Sno-Isle Group). I am also chair of the Shoreline Preservation Society and therefore I feel I have legal standing as a neighbor living almost directly across the City Line and am impacted by decisions and actions taken by Seattle on the matter of Urban Forestry. In addition, I also served on the Community Forestry Council for Department of Natural Resources in 2009, which formulated State Policy on the Evergreen Communities Act. As such, please make me a Party of Record on this matter.

I am strongly supporting the Urban Forestry Commission's recommendations updating the Director's Rule on "Exceptional Trees", and encourage the expansion of these "Significant Trees" and guidance to tree-car providers, on Hazard Trees, and on SEPA requirements.

I support the following elements of the proposed Director's Rule changes, because our region faces dire consequences from impending impacts of Climate Change. These include issues of Health, Environmental Justice, Water and Air Quality, and Economic consequences of loss of Seattle's historic Urban Forest ecosystems. It is vital that Seattle protect its valuable existing trees, especially because only relying on new required tree plantings, leaves the community without the current values these trees provide, especially the shade with prevents "Heat Island Effect." Our existing exceptional and significant trees are our most economic and effective way to prevent Climate Change! On a day like today (August 16. 2020) when temperatures are expected to reach the upper 90 Degree levels, it is very clear why these

existing trees are important!

These UFC recommendations should be followed accurately:

A. The UFC supports the following in proposed Director's Rule 13-2020:

- Reducing the upper threshold on exceptional trees to 24 inches diameter at standard (DSH) from 30 inches DSH.
- Clarifying the definition of a significant tree.
- Requiring tree care provider registration with the City.

Acknowledging tree protection and retention starting with the platting process.

- Continuing tree grove protection even if a tree is removed from a grove.
- Acknowledging that exceptional trees removed during development must be replaced under existing SMC 25.11.090.
- Tightening requirements for removal of exceptional trees as hazard trees.
- Expanding the scope of the Director's Rule to include more protections and clarity, and
- Developing a tree tracking worksheet.

B. The UFC recommends adding language on the scope and intent of the Director's Rule 13-2020 to capture current code's intent to maximize retention of existing trees 6 inches DHS and larger throughout the development process. Proposed new text to be added to the Director's Rule: "To meet Seattle's 2035 Comprehensive Plan goals and tree protection code, all development projects in all zones across the city shall be designed to maximize the retention of existing trees 6 inches DSH and larger." The inclusion of this provision would not limit the development potential of a lot as it still allows SDCI the authority to approve removal of significant trees and exceptional trees if necessary, to complete a project. Clarifying that a development project must be "designed to maximize the retention of existing 2 trees" would, however, give SDCI the authority to stop unnecessary clearcutting of lots that is occurring as well as excessive and unnecessary removal of trees not impacted by the development. The priority should be to protect existing trees that are already providing environmental services and benefits to the city, rather than planting replacement trees for those removed. Policies for the protection of exceptional trees would not be altered.

The following information is provided in support of this recommendation: Existing code SMC 23.22 requires that all trees at least six inches DSH be indicated on site plans and retained as much as possible throughout the development process. Several sections of the code already imply this intent:

- SMC 23.22.020 A: "Every preliminary plat application shall consist of one or more maps

together with written data including the following... Specific location and description of all trees at least 6 inches in diameter measured 4½ feet above the ground, with species indicated.”

- SMC 23.22.054 A: "...if [the Hearing Examiner] finds that the proposed plat...is designed to maximize the retention of existing trees... then it shall be approved"

- SMC 23.24.020: “Applications for approval of a short subdivision shall include the following: ... F. Specific location and description of all trees at least 6 inches in diameter measured 4.5 feet above the ground, with complete scientific and common names of species indicated.”

- SMC 23.24.040 A: “The Director shall, after conferring with appropriate officials, use the following criteria to determine whether to grant, condition, or deny a short plat: ... 7. Whether the proposed division of land is designed to maximize retention of existing trees;” Specifically, as identified in the existing code, “tree” clearly means any tree six inches DSH or larger and does not just refer to exceptional trees. Therefore, the Director’s Rule should clarify that maximizing the retention of all significant trees is part of development designs. This follows from the goals in the 2035 Seattle Comprehensive Plan: The 2035 Seattle Comprehensive Plan in the Environment Section, Land Policies states: "EN1.1 Seek to achieve an urban forest that contains a thriving and sustainable mix of tree species and ages, and that creates a contiguous and healthy ecosystem that is valued and cared for by the City and all Seattleites as an essential environmental, economic, and community asset." “EN 1.2 Strive to increase citywide tree canopy coverage to 30 percent by 2037 and to 40% over time.” SMC 25.11 further clarifies in the purpose and intent section guidance for protecting trees: SMC 25.11.010: It is the purpose and intent of this chapter to:

“A. Implement the goals and policies of Seattle's Comprehensive Plan especially those in the Environment Element dealing with the protection of the urban forest.

B. To preserve and enhance the city's physical and aesthetic character by preventing untimely and indiscriminate removal and destruction of trees.” We note that SMC 25.11 expands tree protection, established by SMC 23, by giving additional protection to exceptional trees. However, to maintain a specific tree species and a thriving urban forest, it is not enough just to maintain the largest specimens. Big, old trees will inevitably die. Trees of varying ages must be protected to replace those that are lost to old age. Otherwise, there will be a significant loss of 3 tree canopy area and volume and its associated environmental services over time. The following section of SMC 25.11 discusses potential exceptional trees: SMC 25.11.050 (General Provisions for exceptional tree determination and tree protection

area delineation in Single Family, Residential Small Lot, Lowrise, Midrise, and Commercial zones):

"Exceptional trees and potential exceptional trees shall be identified on site plans and exceptional tree status shall be determined by the Director according to standards promulgated by the Seattle Department of Construction and Inspections." Additionally, SMC 25.11.100 gives the Director broad discretion on protecting trees as outlined in the purpose and intent of SMC 25.11 and its other provisions: "SMC 25.11.100

A. Authority. The Director shall have authority to enforce the provisions of this chapter, to issue permits, impose conditions, and establish administrative procedures and guidelines, conduct inspections, and prepare the forms necessary to carry out the purposes of this chapter."

C. The UFC makes the following additional recommendations on the proposed Director's Rule 13- 2020: SUBJECT Revise the Subject section to read: "Designation of Exceptional and Significant Trees, Tree Protection and Retention, and Tree Removal During Development, Including Tree Service Provider Requirements". This ensures consistency with the UFC recommendation in section

B. of this letter and a consistent capitalization scheme. PURPOSE AND BACKGROUND After the first paragraph add: "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."

## SECTION 1.

DEFINITIONS 1. Include the SMC 25.11.020 definition of exceptional tree: "Exceptional tree" means a tree or grove of trees that because of its unique historical, ecological, or aesthetic value constitutes an important community resource and is deemed as such by the Director according to standards promulgated by the Seattle Department of Construction and Inspections.

2. Add a definition for "Tree". The UFC suggests using the International Society of Arboriculture's definition: "Tree" means a woody perennial usually having one dominant trunk and a mature height greater than 5 meters (16 feet). Some trees develop more than one stem or trunk. Trees do not include any species which appear on the King County Noxious Weeds

or Weeds of Concern list.

3. Under “Trees not considered exceptional,” the language “have defects or damage that now or in the foreseeable future will result in increased poor health condition and/or limited life expectancy” is vague and open to different interpretations. Consider phrases such as ‘permanent damage’ and ‘continued declining health,’ to reduce guess work and arbitrary timeframes that may vary greatly by species, health, and site conditions. Additionally, the notion of ‘defects in the foreseeable future resulting in limited life expectancy’ is so general that it could arguably be applied to all trees in urban areas. Please avoid dangerously loose definitions that would allow for the continued over-identification of ‘hazard trees.’

4. Please remove special characterization for red alders, black cottonwoods, and bitter cherries as ‘never exceptional.’ This stipulation adds undue complexity to the rules and removes possible tree protections. These red alders, black cottonwoods, and bitter cherries are native trees that have important roles in our ecosystems and for wildlife. Following a “right tree, right place” philosophy, these trees can safely thrive and contribute to our urban canopy.

5. Add the following sentence: “Many significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for large exceptional trees when they die. Development projects must be designed to maximize the retention of existing trees six inches DSH and larger to maintain a diversity of tree species and ages.”

6. Tree groves: The UFC recommends removing the exclusion of street trees from tree groves. Street trees are often planted and maintained by adjacent property owners or unidentified as street trees. This street tree exclusion adds undue complexity and has no ecological basis. They are no different than a grove of trees located across property lines on abutting and/or adjacent lots. UFC also recommends using a reduced significance threshold of six inches for defining trees in a grove. This again reduces complexity and aligns with the rest of the rules and code. Additionally, in that groves are a function of adjoining canopy, not stem size, this threshold would be a more accurate metric to gauge grove function and formation. The UFC also recommends that the minimum number of trees required to constitute a grove be reduced to three. Kirkland, Woodinville and Duvall define a tree grove as three or more trees at least six inches DSH or larger.

## SECTION 2. EXCEPTIONAL TREE PROTECTION

1. The UFC urges the removal of “EXCEPTIONAL” from the Director’s Rule heading. Each of these protections listed apply to all trees six inches DSH and larger.

2. Exceptional Trees during Platting. The UFC recommends removing “Exceptional” from subsection heading. The platting criteria apply to all trees six inches DSH and larger, not just

exceptional trees.

3. The UFC recommends adding the following language after the second paragraph: “The tree retention policy initiated to maximize the retention of existing trees six inches DSH and larger during platting in SMC 23 continues through any subsequent development of lots in all zones in the city.”

4. The UFC recommends revising the last sentence to read: “All plats and subsequent development site plans shall contain the following notation: Pruning and removal of trees as well as future development must comply with City of Seattle tree retention regulations including: SMC 23 - Land Use Code; SMC 25.11 - Seattle Tree Protection Code; SMC 25.05 – SEPA; and SMC 25.09 - Environmental Critical Areas Code.

5. Allowable Encroachment in Exceptional Tree Protection Areas During Proposed Development: Remove “Exceptional” from subsection heading. These rules apply to all tree six inches DSH or greater. Clarify in this section that tree protection areas must include all trees being retained, not just exceptional trees.

### SECTION 3. EXCEPTIONAL TREE REMOVAL

1. The UFC recommends simplifying the third paragraph, as certified professionals are familiar with the details. The UFC recommends simply stating: “The tree risk assessment must conclude that the exceptional tree is a “high” risk hazard using the tree risk assessment methodology and criteria established by the International Society of Arboriculture (ISA) and that the risk cannot be mitigated by 5 pruning, cabling, bracing or other means that would preserve the tree.” And removing the list of bulleted conditions.

2. Tree Risk Assessment Required for Tree Removal, fourth paragraph: revise the definition of “qualified professional” for clarity. Specifically, it is unclear what “three years’ experience in tree evaluation” means. Candidates for ISA Tree Risk Assessment Qualification must already have three years of full-time experience in arboriculture or a combination of education and practical experience. The UFC suggests aligning the language in this section with the language provided by Kirkland’s code (Section 95.10).

3. Tree Risk Assessment Required for Tree Removal section, fifth paragraph and associated bulleted list. The third bullet: “International Society of Arborists” should be “International Society of Arboriculture.” The “and/or” conjunctions obscure the meaning of this bullet point and the education requirements are not clearly connected to arboriculture or forestry. These educational requirements may be redundant anyway, as the ISA Certified Arborist credential has clear experiential and educational requirements for eligibility and certification maintenance. Further educational requirements by the city may disproportionately impact

arborists who may have not had the resources for post-secondary education. If the educational requirements are necessary, the point could be clarified by the following: • International Society of Arboriculture (ISA) Certified Arborist with at least one of the following: o Associate Degree with at least two courses related to arboriculture or urban forestry; o Two years college-level credits with at least two courses related to arboriculture or urban forestry, and/or o 120 Continuing Education Units relating to tree care.

4. Add statement: The UFC recommends adding the statement that “the Director has the authority to conduct inspections... to enforce the provisions of this chapter” as established in SMC 25.11.100. The UFC believes that 25.11 gives SDCI the authority to enter private property to ensure that violations of the ordinance are not taking place, and recommends adding language to that effect. Violations would include possible illegal removal of exceptional trees or removing more than three significant, nonexceptional trees per year.

#### SECTION 4. REQUIRED MITIGATION FOR ALLOWED TREE REMOVAL

1. In the first paragraph The UFC recommends adding a sentence at end: “The Director shall have the authority to allow trees to be planted on private property to meet the goals and objectives of race and social justice under Seattle's Equity and Environment Initiative.”

2. Require that a certified arborist either be present on the work site or visit the site and sign off prior to the specific work being done

3. Require that tree removal and replacement applications be posted on development sites and on the City’s website as soon as they are received and for them to remain until exceptional trees can be removed. This includes both healthy and hazard exceptional trees.

4. Tree replacement needs to have an associated timeframe requirement. By what time is the applicant required to replace the removed tree? What if the tree is removed at the start of summer? Best practice in Seattle is to plant trees in autumn. The UFC suggests, “All replacement trees shall be planted in October through December and no later than 12 months after removal. The applicant shall prepare and, if necessary, amend the existing soil conditions...”

5. All replacement trees, regardless of their size, are protected trees. When planted on development sites trees must be maintained by the property owner, or designee for the life of the project (to be consistent with Director’s Rule 11-2020: Landscaping Standards and Green Factor). To help ensure 6 survival and proper establishment of replacement trees wherever they are planted, they shall be watered during the summer months for a minimum of 5 years. If replacement trees die or are removed, they must be replaced.

6. For Table 1, a single column header spans two columns and is not the easily understood;

the UFC suggests revising to two headings. The UFC also recommends adding notation to indicate native species as below: Tree Species DSH at which becomes Exceptional ALDER, Sitka – *Alnus sinuate* 6” APPLE, Orchard (Common) – *Malus* sp. 20” ASH, European – *Fraxinus excelsior* 22” ASPEN, Quaking – *Populus tremuloides*\* 12” ... \*Native to Washington state.

7. For Table 1’s record for WILLOW species. All specific epithets, subspecies, and variety names should be lower case, and species varieties should be indicated by “var.” instead of “ver.” The entry should read: WILLOW (All native species) – *Salix* sp. (*geyeriana* var. *meleina*, *eriocephala* ssp. *mackenzieana*, *hookeriana*, *piperi*, *scouleriana*, *sitchensis*) 8” ...

8. Preference for replacement trees shall be selected from a City list of comparable native trees or trees that meet future climate criteria. Evergreen trees shall have preference over deciduous trees.

9. Under SMC 25.11.090 the Director has the authority to require “one or more trees” to be planted as replacement trees for exceptional trees removed during development. The number of trees required in such instances should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years or less. Any in lieu fee adopted if the tree or trees cannot be replaced on site must also rise as the size of the removed tree increases.

#### SECTION 5: USE OF THIS RULE IN THE APPLICATION OF SEPA

1. This section needs to accurately communicate the SEPA requirements as enumerated in SMC 25.05.675 N. These requirements are for protecting special habitats and should be considered at the beginning of the process. The policy language calls for the City to protect special habitats. The specific language should be included, as in previous drafts of this Director's Rule, to leave no ambiguity. Current language suggests it pertains only to perhaps saving an exceptional tree rather than giving protection to trees and vegetation that comprise special or unique habitat, including tree groves. Exact SMC 25.05.675 N. wording below:

##### 2.Policies

a. It is the City's policy to minimize or prevent the loss of wildlife habitat and other vegetation which have substantial aesthetic, educational, ecological, and/or economic value. A high priority shall be given to the preservation and protection of special habitat types. Special habitat types include, but are not limited to, wetlands and associated areas (such as upland nesting areas), 7 and spawning, feeding, or nesting sites. A high priority shall also be given to meeting the needs of state and federal threatened, endangered, and sensitive species of both plants and animals.

b. For projects that are proposed within an identified plant or wildlife habitat or travelway, the decisionmaker shall assess the extent of adverse impacts and the need for mitigation.

c. When the decisionmaker finds that a proposed project would reduce or damage rare, uncommon, unique, or exceptional plant or wildlife habitat, wildlife travelways, or habitat diversity for species (plants or animals) of substantial aesthetic, educational, ecological, or economic value, the decisionmaker may condition or deny the project to mitigate its adverse impacts. Such conditioning or denial is permitted whether or not the project meets the criteria of the overview policy set forth in Section 25.05.665.

d. Mitigating measures may include but are not limited to:

- 1) Relocation of the project on the site;
- 2) Reducing the size or scale of the project;
- 3) Preservation of specific on-site habitats, such as trees or vegetated areas;
- 4) Limitations on the uses allowed on the site;
- 5) Limitations on times of operation during periods significant to the affected species (e.g., spawning season or mating season); and 6) Landscaping and/or retention of existing vegetation.

2. The complexity of all the codes and requirements relevant for tree protections again suggests that SDCI needs to, like SDOT has done for street trees, put all the requirements in one manual rather than having people search through many different SMCs, TIPS, and Director's Rules to figure out what to do. Here is SDOT's Street Tree Manual. This would make it a lot easier for residents, developers, tree care providers, and others to understand the code.

## SECTION 6. TREE CARE PROVIDER ACKNOWLEDGEMENT

1. The UFC suggests that SDCI follow more closely SDOT's Tree Service Provider Registration language. Change the title of the form to "SDCI Tree Service Provider Registration" rather than "acknowledgement." SDOT calls them Tree Service Providers, the UFC recommends using the same term.

2. More than three citations during a one-year period before a tree service provider is removed from the City's list to do business in Seattle is overly generous. Please reduce the number of citations per oneyear period to two.

3. Require annual registration, same as Seattle business licenses require, so that tree service providers can confirm who their current licensed arborists are and review and acknowledge any updated code language and regulations. Otherwise as personnel change in a company, data filed with the City may quickly become outdated and the company will not be confirming

they are aware of any code and regulation changes.

4. The UFC recommends that SDCI require tree service providers to submit the same documents and certifications as SDOT tree service provider registration requires:

- WA state contractor license (L&I) to ensure workers have ability to get worker's compensation if injured.
- City of Seattle Business license - annual 8
- Certificate of Insurance - City of Seattle must be listed as additional insured. (See SDOT Client Assistance Memo (CAM) 2102 for their detailed instructions. Not having Seattle being listed as additional insured opens them up to being sued for accidents and harm.
- If the business has a current Street Use Annual Vehicle Permit, provide the permit number.
- Require that a certified arborist either be present on work site or sign off on all work

5. Require that tree removal and replacement permits be posted on development site where exceptional trees will be removed.

So to sum up, please pass and implement these detailed and valuable recommendations of Seattle's own Urban Forestry Commission. They will make a huge difference to your community's Quality of Life, the Health of your constituents, their families and their Environmental Rights to Clean Air, Water and Open Space and Recreation and protection from devastating impacts of Climate Change that is bearing down on all of us, as we speak.

Respectfully Submitted,

Janet M Way

Janet Way

[janetway@yahoo.com](mailto:janetway@yahoo.com)

940 NE 147th Street

Shoreline, Washington 98155

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**From:** Wendy Lagozzino <lagoz@q.com>

**Sent:** Sunday, August 16, 2020 2:43 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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The following changes to the draft Director's Rule are needed:

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- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as "a group of 3 or more significant trees with overlapping or touching crowns." Include street trees in groves.
- Add "Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to

maintain a diversity of tree species and ages.”

- Add “All replacement trees regardless of size are protected trees and can’t be removed.”
- SECTION 2. Change the heading to “TREE PROTECTION”. Remove references to “Exceptional Trees” only and change to “Trees”. e.g., change “Exceptional Tree Protection Areas” to “Tree Protection Areas”.
- SECTION 4. Add “The Director shall have the authority to allow replacement trees on both public and private property to meet the goals and objectives of race and social justice under Seattle’s Equity and Environment Initiative.”
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Thank you for protecting our urban forest.

Wendy Lagozzino

[lagoz@q.com](mailto:lagoz@q.com)

2811 Queen Anne Ave N  
Seattle, Washington 98109

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**From:** Steve Dunnington <info@email.actionnetwork.org>  
**Sent:** Sunday, August 16, 2020 2:49 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

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The following changes to the draft Director's Rule are needed:

- Change Subject Title to remove words “land division” and replace with “Development”
- PURPOSE AND BACKGROUND. add “SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city.”
- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as “a group of 3 or more significant trees with overlapping or touching crowns.” Include street trees in groves.
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- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats and need to be considered at the beginning of the development process. The language of this SEPA code section should be included in the Director’s Rule to be certain that the code is complied with.
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Thank you for protecting our urban forest.

Steve Dunnington

[dunnington50@gmail.com](mailto:dunnington50@gmail.com)

7814 39th Ave SW

Seattle, Washington 98136

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**From:** Abigail Hoehne <info@email.actionnetwork.org>

**Sent:** Sunday, August 16, 2020 3:12 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

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- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches

- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
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Thank you for protecting our urban forest.

Abigail Hoehne

[abigailehoehne@gmail.com](mailto:abigailehoehne@gmail.com)

524 N 67th St

Seattle, Washington 98103

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**From:** Pamela Austin <freeandflying@live.com>

**Sent:** Sunday, August 16, 2020 3:18 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

As I sit in my small condo drafting this letter, the temperature outside is expected to reach well into the 90's. Our city residents need the cooling shelter of our precious trees. We have already lost too many of our sheltering trees. Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages.”

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Thank you for protecting our urban forest.

Sincerely,

Pamela Austin

Pamela Austin

[freeandflying@live.com](mailto:freeandflying@live.com)

7320 E Green Lake Dr N #204

Seattle, Washington 98115

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**From:** Mary Schlater <info@email.actionnetwork.org>  
**Sent:** Sunday, August 16, 2020 3:19 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Dear Seattle City council members and Mayor Durkan,

I am a resident in the Victory Heights neighborhood in northeast Seattle near Northgate. We have seen a significant amount of large trees cut in our neighborhood with little regard for altering building designs to preserve these irreplaceable trees. There are way too many loopholes in the SDCI building permit process. Just next door to us at 12003 22nd Ave NE, a builder proceeded with cutting trees on a Saturday and did not have first ground inspection in place. SDCI was notified on the Wednesday prior that this was going to occur soon and no one was sent to inspect the property before trees were cut. On the Monday after the trees were cut SDCI said that the first ground inspection was issued on that Monday. Therefore, the builder was not held accountable for proceeding without a permit. Also he removed 2 large Douglas Firs without a SDOT right of way permit in place. The SDOT was notified and they merely came out and took pictures of what was occurring but work continued. They also confirmed that this builder had proceeded without a proper permit in place but again there doesn't seem to have been any consequences to the builder. This does not inspire much confidence that builders will be held accountable even if we do tighten the Director's rule.

There are many other loopholes such as poor enforcement likely due to understaffing and underfunding and lack of accountability on the part of SDCI.

That said, I whole heartedly encourage you to pass this Director's Rule with the amendments listed below because is at least a step in the right direction. Trees should be preserved in all neighborhoods in Seattle, not just the wealthy ones. Everyone should be able to enjoy the Emerald city trees to just a few. While the Council has passed the Green New Deal, I have not seen evidence of preserving what is green in our city particularly our trees.

And given COVID 19, Seattle residents need more green space with trees not less. We urgently need to stop the frequent and unabated cutting of our large trees and consider smarter development where as many trees as possible are preserved and protected through requiring altered designs to protect them. And that needs to be properly enforced. I am asking you to do the following,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

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The following changes to the draft Director's Rule are needed:

- Change Subject Title to remove words "land division" and replace with "Development"

- **PURPOSE AND BACKGROUND.** add “SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city.”
- **SECTION 1.** Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as “a group of 3 or more significant trees with overlapping or touching crowns.” Include street trees in groves.
- Add “Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages.”
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Require that Tree Care Provider companies have a WA State contractor's license to ensure they have workers' compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

Mary Schlater

12003 23rd Ave NE

Seattle, WA, 98125

Email: [mschlater7108@gmail.com](mailto:mschlater7108@gmail.com)

Mary Schlater

[mschlater7108@gmail.com](mailto:mschlater7108@gmail.com)

12003 23rd Ave NE

Seattle, Washington 98125

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**From:** Shellay Maughan <info@email.actionnetwork.org>

**Sent:** Sunday, August 16, 2020 3:27 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

Shellay Maughan

[matertiamat@hotmail.com](mailto:matertiamat@hotmail.com)

3816 ne 113th st

Seattle , Washington 98125

---

**From:** Rick Fox <info@email.actionnetwork.org>

**Sent:** Sunday, August 16, 2020 3:29 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

Rick Fox

[rickfox@gmail.com](mailto:rickfox@gmail.com)

17005 137th pl se  
Renton , Washington 98058

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**From:** Christopher King <Cmking@seanet.com>  
**Sent:** Sunday, August 16, 2020 3:36 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

This is important!

Christopher King

[Cmking@seanet.com](mailto:Cmking@seanet.com)

3618 Ashworth Ave N

Seattle, Washington 98103

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**From:** Jill Van Osdell <info@email.actionnetwork.org>

**Sent:** Sunday, August 16, 2020 3:40 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Immediately adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard

height (DSH) from 30 inches

- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
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- Tightening tree removal requirements for exceptional trees as hazard trees

The following changes to the draft Director's Rule are needed:

- Change Subject Title to remove words "land division" and replace with "Development"
- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."
- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as "a group of 3 or more significant trees with overlapping or touching crowns." Include street trees in groves.
- Add "Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages."
- Add "All replacement trees regardless of size are protected trees and can't be removed."
- SECTION 2. Change the heading to "TREE PROTECTION". Remove references to "Exceptional Trees" only and change to "Trees". e.g., change "Exceptional Tree Protection Areas" to "Tree Protection Areas".
- SECTION 4. Add "The Director shall have the authority to allow replacement trees on both public and private property to meet the goals and objectives of race and social justice under Seattle's Equity and Environment Initiative."
- Under SMC 25.11.090 the Director has the authority to require "one or more trees" to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve

equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.

- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats and need to be considered at the beginning of the development process. The language of this SEPA code section should be included in the Director's Rule to be certain that the code is complied with.
- SECTION 6. SDCI should adopt SDOT's registration process and requirements to assist Tree Care Providers in complying with city code and regulations. Reduce the number of citations that will remove a Tree Care Provider from being registered with the city to no more than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor's license to ensure they have workers' compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

Jill Van Osdell

[jvanos1@hotmail.com](mailto:jvanos1@hotmail.com)

2033 NW 62nd St

Seattle, Washington 98107

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From: [dikunde@everyactioncustom.com](mailto:dikunde@everyactioncustom.com) <[dikunde@everyactioncustom.com](mailto:dikunde@everyactioncustom.com)>

Sent: Sunday, August 16, 2020 3:45 PM

To: Pinto de Bader, Sandra <[Sandra.Pinto\\_de\\_Bader@Seattle.gov](mailto:Sandra.Pinto_de_Bader@Seattle.gov)>

Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

Protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCI is no longer concerned about the fate of the smaller, non-exceptional trees.
- Protect red alders, black cottonwoods, and bitter cherries. These native trees provide important resources to birds and other wildlife and contribute to our sense of place in Seattle. Following the "right tree, right place" philosophy, these native trees can safely thrive and should be protected like other species.
- Expand the definition of tree groves to stands of six or more trees at least six inches in diameter, including street trees. Tree groves provide important habitat for birds and are becoming less common outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove.
- Require public notice postings on development site and online for removal of Exceptional trees, even when hazardous, to ensure community members know when and where legal tree removal is occurring.
- Require replacement for trees removed from groves and removed hazard trees.
- Align SDCI's proposed Tree Care Provider Acknowledgement with SDOT's Tree Service Provider Registration. Do not automatically renew this form annually. It should be updated each year. Reduce the number of infractions tree service providers can incur in a year before they are removed from the City's list to do business from more than three infractions to more than two infractions.
- Section 4: Preference for planting off-site replacement trees on public property is restrictive. The Director should be able to allow replacement trees not only on public property, but also on private property, where desired by the property owner, in order to meet the City's goals and objectives of race and social justice under Seattle's Equity and Environment Initiative.

The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
Diana Kunde  
1506 NE 140th St Seattle, WA 98125-3226 [dikunde@sbcglobal.net](mailto:dikunde@sbcglobal.net)

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**From:** Carol Olwell <info@email.actionnetwork.org>

**Sent:** Sunday, August 16, 2020 3:48 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

The increasing effects of climate change warrant a change in Seattle's tree policy to give trees better protection.

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
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The following changes to the draft Director's Rule are needed:

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- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."

- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as “a group of 3 or more significant trees with overlapping or touching crowns.” Include street trees in groves.
- Add “Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages.”
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certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

Carol Olwell

[cjolwell@gmail.com](mailto:cjolwell@gmail.com)

2117 5th Ave. West

Seattle, Washington 98119-8909

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**From:** Ilse Kluge <info@email.actionnetwork.org>

**Sent:** Sunday, August 16, 2020 3:50 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

Ilse Kluge

[ivkluge@gmail.com](mailto:ivkluge@gmail.com)

1550 NW 195th St Unit 105

Shoreline, Washington 98177-2855

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**From:** Judy Siehl <info@email.actionnetwork.org>  
**Sent:** Sunday, August 16, 2020 4:13 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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I am heartily in favor of these proposed changes. We need trees for so many reasons: shade, lowering air pollution, creating oxygen, beauty, home for birds, to name a few. We need to act now to keep our landscape people friendly and to avoid the "urban canyons" look which can harden the soul. I urge you support our trees, wherever they are, but especially in densely populated areas, not just single home communities. I am hoping that you will consider the needs of ordinary citizens over the wishes of developers. Let's continue to have heart and concern for residents.

Thank you for protecting our urban forest.

Best wishes to you--

Judy Siehl

Judy Siehl

[judithsiehl@gmail.com](mailto:judithsiehl@gmail.com)

2040 13th Ave W Apt 21

Seattle, Washington 98119

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**From:** Frank I Backus <info@email.actionnetwork.org>

**Sent:** Sunday, August 16, 2020 4:23 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

Frank I Backus

[frankbackus1@gmail.com](mailto:frankbackus1@gmail.com)

450 NE 100TH ST APT 624

Seattle, Washington 98125-8028

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**From:** Elizabeth Edlund <info@email.actionnetwork.org>

**Sent:** Sunday, August 16, 2020 5:16 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Seattle needs to maintain or grow its tree coverage, not lose it. Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection

for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue. Seattle needs to maintain and grow its green canopy, not continue to lose it.

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Thank you for protecting our urban forest.

Sincerely,  
Elizabeth Edlund

Elizabeth Edlund  
[dangermouse66@gmail.com](mailto:dangermouse66@gmail.com)  
9917 15th Ave NW  
Seattle, Washington 98117

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**From:** Theresa Huey <info@email.actionnetwork.org>  
**Sent:** Sunday, August 16, 2020 5:34 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

Sandra Pinto de Bader,

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- SECTION 4. Add “The Director shall have the authority to allow replacement trees on both public and private property to meet the goals and objectives of race and social justice under Seattle’s Equity and Environment Initiative.”
- Under SMC 25.11.090 the Director has the authority to require “one or more trees” to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.
- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats and need to be considered at the beginning of the development process. The language of this SEPA code section should be included in the Director’s Rule to be certain that the code is complied with.
- SECTION 6. SDCI should adopt SDOT’s registration process and requirements to assist Tree Care Providers in complying with city code and regulations. Reduce the number of citations that will remove a Tree Care Provider from being registered with the city to no more than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor’s license to ensure they have workers’ compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

Theresa Huey  
[trhuey@aol.com](mailto:trhuey@aol.com)

4220 S Lucile St  
Seattle, Washington 98118

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**From:** Andrea Swope <info@email.actionnetwork.org>  
**Sent:** Sunday, August 16, 2020 5:44 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Keep Seattle Livable!

**CAUTION: External Email**

Sandra Pinto de Bader,

Seattle's trees and urban forest are vital to keeping our city healthy and livable. Trees and the urban forest comprise a vital green infrastructure. Trees reduce air pollution, storm water runoff and climate impacts like heat island effects, while providing essential habitat for birds and other wildlife. They are important for the physical and mental health of our residents.

Seattle's rapid growth and an outdated tree ordinance are reducing these beneficial effects as trees are removed and not replaced. It is urgent to act now to stop this continued loss of trees, particularly large mature trees and tree groves. It is important to promote environmental equity as trees are replaced.

Please update Seattle's Tree Protection Ordinance as recommended in the latest draft by the Seattle Urban Forestry Commission.

Here are the key provisions that need to be in the updated tree ordinance:

1. Expand the existing Tree Removal and Replacement Permit Program, including 2-week public notice and posting on-site, as used by the Seattle Department of Transportation (SDOT) – to cover all Significant Trees (6" and larger diameter at breast height (DBH)) on private property in all land use zones, both during development and outside development.
2. Require the replacement of all Significant Trees removed with trees that in 25 years will reach equivalent canopy volume – either on site or pay a replacement fee into a City Tree Replacement and Preservation Fund. Allow the Fund to also accept fines, donations, grants

and set up easements.

3. Retain current protections for Exceptional Trees and reduce the upper threshold for Exceptional Trees to 24" DBH, protect tree groves and prohibit Significant Trees being removed on undeveloped lots.
4. Allow removal of no more than 2 Significant non-Exceptional Trees in 3 years per lot outside development
5. Establish one citywide database for applying for Tree Removal and Replacement Permits and to track changes in the tree canopy.
6. Post online all permit requests and permit approvals for public viewing.
7. Expand SDOT's existing tree service provider's registration and certification to register all Tree Service Providers (arborists) working on trees in Seattle.
8. Provide adequate funding in the budget to implement and enforce the updated ordinance.

Andrea Swope

[andswope@aol.com](mailto:andswope@aol.com)

232 NW 52ND ST

Seattle, Washington 98107

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**From:** Matt Clark <info@email.actionnetwork.org>

**Sent:** Sunday, August 16, 2020 5:57 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long

overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees

The following changes to the draft Director's Rule are needed:

- Change Subject Title to remove words "land division" and replace with "Development"
- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."
- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as "a group of 3 or more significant trees with overlapping or touching crowns." Include street trees in groves.
- Add "Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages."
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- Under SMC 25.11.090 the Director has the authority to require “one or more trees” to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.
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Thank you for protecting our urban forest.

Matt Clark

[mattus@gmail.com](mailto:mattus@gmail.com)

1240 NE 91St St

Seattle, Washington 98115

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**From:** Amy Bosch <info@email.actionnetwork.org>  
**Sent:** Sunday, August 16, 2020 5:59 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI’s Director’s Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

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Thank you for protecting our urban forest.

Amy Bosch

[boschschmosch@gmail.com](mailto:boschschmosch@gmail.com)

1128 15th Ave  
Seattle, Washington 98122

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**From:** Chandan Rastogi <info@email.actionnetwork.org>  
**Sent:** Sunday, August 16, 2020 6:06 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

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Thank you for protecting our urban forest.

Chandan Rastogi

[chandan0102@hotmail.com](mailto:chandan0102@hotmail.com)

500 3rd Ave W APT 111

Seattle, Washington 98119

---

**From:** Jon Lisbin <info@email.actionnetwork.org>

**Sent:** Sunday, August 16, 2020 6:11 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Do what's right. We only have one earth. Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

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Thank you for protecting our urban forest.

Jon Lisbin

[lisbinator@gmail.com](mailto:lisbinator@gmail.com)

32nd ave nw

Seattle, Washington 98117

---

**From:** David Reusch <info@email.actionnetwork.org>  
**Sent:** Sunday, August 16, 2020 6:11 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Intelligent development CAN coexist with preservation of our natural resources. The Director's Rule is a sensible way to accomplish this with respect to our invaluable treescape. Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

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Thank you for protecting our urban forest.

David Reusch

[dbreusch@me.com](mailto:dbreusch@me.com)

7408 E Green Lake Dr N Apt A  
Seattle, Washington 98115

---

**From:** Luke Armitstead <info@email.actionnetwork.org>  
**Sent:** Sunday, August 16, 2020 6:37 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

Luke Armitstead

[lukearmit@gmail.com](mailto:lukearmit@gmail.com)

1816 27th Ave unit A

Seattle, Washington 98122

---

**From:** Jane Dewell <info@email.actionnetwork.org>  
**Sent:** Sunday, August 16, 2020 6:45 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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- PURPOSE AND BACKGROUND. add “SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city.”
- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as “a group of 3 or more significant trees with overlapping or touching crowns.” Include street trees in groves.
- Add “Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages.”
- Add “All replacement trees regardless of size are protected trees and can’t be removed.”
- SECTION 2. Change the heading to “TREE PROTECTION”. Remove references to “Exceptional Trees” only and change to “Trees”. e.g., change “Exceptional Tree Protection Areas” to “Tree Protection Areas”.
- SECTION 4. Add “The Director shall have the authority to allow replacement trees on both public and private property to meet the goals and objectives of race and social justice under Seattle’s Equity and Environment Initiative.”
- Under SMC 25.11.090 the Director has the authority to require “one or more trees” to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of

the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.

- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats and need to be considered at the beginning of the development process. The language of this SEPA code section should be included in the Director's Rule to be certain that the code is complied with.
- SECTION 6. SDCI should adopt SDOT's registration process and requirements to assist Tree Care Providers in complying with city code and regulations. Reduce the number of citations that will remove a Tree Care Provider from being registered with the city to no more than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor's license to ensure they have workers' compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

Jane Dewell

[dewelljane@aol.com](mailto:dewelljane@aol.com)

11327 23rd Ave NE

Seattle, Washington 98125

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**From:** Susan Price <info@email.actionnetwork.org>  
**Sent:** Sunday, August 16, 2020 6:50 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees

The following changes to the draft Director's Rule are needed:

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Thank you for protecting our urban forest.

Susan Price

[prices08@gmail.com](mailto:prices08@gmail.com)

5133 48th Ave NE

Seattle, Washington 98105

**From:** Reda Tipton <Redabook@comcast.net>  
**Sent:** Sunday, August 16, 2020 6:52 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

We love our Emerald City!

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Thank you for protecting our urban forest.

Reda Tipton

[Redabook@comcast.net](mailto:Redabook@comcast.net)

135 N 105th St, #204

Seattle , Washington 98133

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**From:** Rebecca Collias <info@email.actionnetwork.org>  
**Sent:** Sunday, August 16, 2020 7:08 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

Rebecca Collias

[rlcdancer@gmail.com](mailto:rlcdancer@gmail.com)

6003 Greenwood Ave N

Seattle, Washington 98103

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**From:** Denise Drrr <drnisederr@live.con>

**Sent:** Sunday, August 16, 2020 7:09 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

Denise Drrr

[drnisederr@live.com](mailto:drnisederr@live.com)

2912 4th Ave. W

Seattle , Washington 98119

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**From:** Norah Scully <info@email.actionnetwork.org>

**Sent:** Sunday, August 16, 2020 7:14 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

Sandra Pinto de Bader,

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We are rapidly losing large trees in Seattle and neighbors have been forced to fight hard to save them from developers' bulldozers. With thoughtful design it should be possible to both increase density and retain significant trees. We desperately need stronger protections for

trees, now.

Thank you for protecting our urban forest.

Norah Scully

[scullynorah@gmail.com](mailto:scullynorah@gmail.com)

1414 NW 62nd St.

Seattle, Washington 98107

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**From:** jan mik <janmikus@comcast.net>

**Sent:** Sunday, August 16, 2020 7:39 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

jan mik

[janmikus@comcast.net](mailto:janmikus@comcast.net)

1614 26th Circle

Anacortes, Washington 98221-3879

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**From:** interurban trees <info@email.actionnetwork.org>

**Sent:** Sunday, August 16, 2020 7:45 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

We have been working on revising Seattle's ailing tree code for over a year now. It needs to be implemented with the guidance of the Seattle Urban Forestry Commission in the near future. In the mean time the Director's Rule 13-2020 with the Forestry Commissions additions with start the process. Please support this measure to prevent the loss of our once famous quality of life here in Seattle!

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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- Under SMC 25.11.090 the Director has the authority to require “one or more trees” to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.
- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats and need to be considered at the beginning of the development process. The language of this SEPA code section should be included in the Director’s Rule to be certain that the code is complied with.
- SECTION 6. SDCI should adopt SDOT’s registration process and requirements to assist Tree Care Providers in complying with city code and regulations. Reduce the number of citations that will remove a Tree Care Provider from being registered with the city to no more than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor’s license to ensure they have workers’ compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

interurban trees

[lance\\_young@yahoo.com](mailto:lance_young@yahoo.com)

14810 linden ave n

seattle, Washington 98133

**From:** Patty Young <info@email.actionnetwork.org>  
**Sent:** Sunday, August 16, 2020 7:53 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Keep Seattle Livable!

**CAUTION: External Email**

Sandra Pinto de Bader,

Seattle's trees and urban forest are vital to keeping our city healthy and livable. Trees and the urban forest comprise a vital green infrastructure. Trees reduce air pollution, storm water runoff and climate impacts like heat island effects, while providing essential habitat for birds and other wildlife. They are important for the physical and mental health of our residents.

Seattle's rapid growth and an outdated tree ordinance are reducing these beneficial effects as trees are removed and not replaced. It is urgent to act now to stop this continued loss of trees, particularly large mature trees and tree groves. It is important to promote environmental equity as trees are replaced.

Please update Seattle's Tree Protection Ordinance as recommended in the latest draft by the Seattle Urban Forestry Commission.

Here are the key provisions that need to be in the updated tree ordinance:

1. Expand the existing Tree Removal and Replacement Permit Program, including 2-week public notice and posting on-site, as used by the Seattle Department of Transportation (SDOT) – to cover all Significant Trees (6" and larger diameter at breast height (DBH)) on private property in all land use zones, both during development and outside development.
2. Require the replacement of all Significant Trees removed with trees that in 25 years will reach equivalent canopy volume – either on site or pay a replacement fee into a City Tree Replacement and Preservation Fund. Allow the Fund to also accept fines, donations, grants and set up easements.
3. Retain current protections for Exceptional Trees and reduce the upper threshold for Exceptional Trees to 24" DBH, protect tree groves and prohibit Significant Trees being removed on undeveloped lots.
4. Allow removal of no more than 2 Significant non-Exceptional Trees in 3 years per lot outside development
5. Establish one citywide database for applying for Tree Removal and Replacement Permits

and to track changes in the tree canopy.

6. Post online all permit requests and permit approvals for public viewing.
7. Expand SDOT's existing tree service provider's registration and certification to register all Tree Service Providers (arborists) working on trees in Seattle.
8. Provide adequate funding in the budget to implement and enforce the updated ordinance.

Patty Young

[pgpfeifer@gmail.com](mailto:pgpfeifer@gmail.com)

14810 Linden Ave N

Shoreline, Washington 98133

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**From:** lance young <info@email.actionnetwork.org>  
**Sent:** Sunday, August 16, 2020 7:54 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

The heat island affect of urban environments is particularly evident on days like this (98 fahrenheit). Our trees help to reduce this effect in studies showing that a small 4 meter (13 foot) tree can provide as as much cooling effects as two small air conditioners, and it does this for free! Please support this measure and preserve our environment

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees

The following changes to the draft Director’s Rule are needed:

- Change Subject Title to remove words “land division” and replace with “Development”
- PURPOSE AND BACKGROUND. add “SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city.”
- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as “a group of 3 or more significant trees with overlapping or touching crowns.” Include street trees in groves.
- Add “Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages.”
- Add “All replacement trees regardless of size are protected trees and can’t be removed.”
- SECTION 2. Change the heading to “TREE PROTECTION”. Remove references to “Exceptional Trees” only and change to “Trees”. e.g., change “Exceptional Tree Protection Areas” to “Tree Protection Areas”.
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of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.

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Thank you for protecting our urban forest.

lance young

[lance\\_young@yahoo.com](mailto:lance_young@yahoo.com)

14810 linden ave n

Seattle, Washington 98133

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**From:** Chuck Dolan <info@email.actionnetwork.org>  
**Sent:** Sunday, August 16, 2020 7:59 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

Trees protection is needed in the face of climate change and the City's Green Stormwater Infrastructure goals.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
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The following changes to the draft Director's Rule are needed:

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- Add “Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages.”
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Thank you for protecting our urban forest.

Chuck Dolan  
[chucklesd2@hotmail.com](mailto:chucklesd2@hotmail.com)  
1220 NE 97th St  
Seattle, Washington 98115

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**From:** Kevin Murphy <info@email.actionnetwork.org>  
**Sent:** Sunday, August 16, 2020 8:25 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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The following updates as proposed in the draft Director's Rule are great steps forward:

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- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090

- Tightening tree removal requirements for exceptional trees as hazard trees

The following changes to the draft Director's Rule are needed:

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Thank you for protecting our urban forest.

Kevin Murphy

[kemurphy1972@hotmail.com](mailto:kemurphy1972@hotmail.com)

526 30th ave east

Seattle, Washington 98112

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**From:** Cynthia Rose <info@email.actionnetwork.org>  
**Sent:** Sunday, August 16, 2020 8:41 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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Thank you for protecting our urban forest.

Cynthia Rose

[crose1453@gmail.com](mailto:crose1453@gmail.com)

11557 23rd Ave NE

Seattle , Washington 98125

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**From:** Karen Gadwell <info@email.actionnetwork.org>  
**Sent:** Sunday, August 16, 2020 8:52 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

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Thank you for protecting our urban forest.

Karen Gadwell

[kgadwell@gmail.com](mailto:kgadwell@gmail.com)

Seattle  
WA, Washington 98125

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**From:** June BlueSpruce <info@email.actionnetwork.org>  
**Sent:** Sunday, August 16, 2020 9:08 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

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Thank you for protecting our urban forest.

Sincerely yours,

June BlueSpruce

Columbia City - District 2

**From:** Bruce Sarvis <info@email.actionnetwork.org>

**Sent:** Sunday, August 16, 2020 9:09 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."
- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as "a group of 3 or more significant trees with overlapping or touching crowns." Include street trees in groves.
- Add "Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages."
- Add "All replacement trees regardless of size are protected trees and can't be removed."
- SECTION 2. Change the heading to "TREE PROTECTION". Remove references to "Exceptional Trees" only and change to "Trees". e.g., change "Exceptional Tree Protection Areas" to "Tree Protection Areas".
- SECTION 4. Add "The Director shall have the authority to allow replacement trees on

both public and private property to meet the goals and objectives of race and social justice under Seattle’s Equity and Environment Initiative.”

- Under SMC 25.11.090 the Director has the authority to require “one or more trees” to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.
- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats and need to be considered at the beginning of the development process. The language of this SEPA code section should be included in the Director’s Rule to be certain that the code is complied with.
- SECTION 6. SDCI should adopt SDOT’s registration process and requirements to assist Tree Care Providers in complying with city code and regulations. Reduce the number of citations that will remove a Tree Care Provider from being registered with the city to no more than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor’s license to ensure they have workers’ compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

Bruce Sarvis

[brucesarvis@hotmail.com](mailto:brucesarvis@hotmail.com)

4009 Northeast 115th Street

Seattle, Washington 98125

**From:** Tracy Tardiff <info@email.actionnetwork.org>  
**Sent:** Sunday, August 16, 2020 9:16 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

I am writing because the tree canopy is very important to me. This tree protection rule is overdue. You simply cannot put a price on trees. They are a priceless resource to be protected and managed,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees

The following changes to the draft Director's Rule are needed:

- Change Subject Title to remove words “land division” and replace with “Development”
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- Under SMC 25.11.090 the Director has the authority to require “one or more trees” to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.
- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats and need to be considered at the beginning of the development process. The language of this SEPA code section should be included in the Director’s Rule to be

certain that the code is complied with.

- SECTION 6. SDCI should adopt SDOT's registration process and requirements to assist Tree Care Providers in complying with city code and regulations. Reduce the number of citations that will remove a Tree Care Provider from being registered with the city to no more than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor's license to ensure they have workers' compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

Tracy Tardiff

[tctardiff@icloud.com](mailto:tctardiff@icloud.com)

2603 NE 137th St.

Seattle, Washington 98125

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**From:** Lynn Fitz-Hugh <lynn.fitzhugh@earthlink.net>  
**Sent:** Sunday, August 16, 2020 9:22 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

I have been working for 3 years with a succession of city council members all of whom no longer hold office on trying to get a new tree ordinance passed. It is so LONG overdue to have this passed that it is outrageous that Master builders who said not a peep in that whole time would not try to stop this! We already have seen so, so many trees lost in the last 5 years of development of Seattle. If we don't act soon the horse will really be already out of the barn in a way that will make our name "the Emerald city" a joke.

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches. A 24 inch tree sequesters and stores a lot of carbon! It is older than you. It deserves to live.
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process. We have to do this to meet our canopy goals
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires. They need to more than register. They need to sign a statement that they have read and will abide by these rules, or lose their tree cutting license.
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees. This is so helpful because people have been playing with this requirement.

The following changes to the draft Director's Rule are needed:

- Change Subject Title to remove words "land division" and replace with "Development"
- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."
- Add "Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages." This is very important we will not meet our tree canopy goals otherwise.
- Add "All replacement trees regardless of size are protected trees and can't be removed." If this is not in their you render meaningless the idea of replacement tree.
- SECTION 2. Change the heading to "TREE PROTECTION". Remove references to "Exceptional Trees" only and change to "Trees". e.g., change "Exceptional Tree Protection Areas" to "Tree Protection Areas".
- SECTION 4. Add "The Director shall have the authority to allow replacement trees on both public and private property to meet the goals and objectives of race and social justice under Seattle's Equity and Environment Initiative."
- Under SMC 25.11.090 the Director has the authority to require "one or more trees" to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.
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certain that the code is complied with.

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Thank you for protecting our urban forest.

Lynn Fitz-Hugh

[lynn.fitzhugh@earthlink.net](mailto:lynn.fitzhugh@earthlink.net)

12341 - 35th Ave NE #305

Seattle, Washington 98125

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From: invader.gz@everyactioncustom.com <invader.gz@everyactioncustom.com>

Sent: Sunday, August 16, 2020 9:26 PM

To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

I support the Urban Forestry Commission's recommendations on the Draft Directors rules under consideration.

Sincerely,

Grace Zandt

5963 Rainier Ave S Seattle, WA 98118-2763 [invader.gz@gmail.com](mailto:invader.gz@gmail.com)

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**From:** Cleo Faraone <cleofaraone@comcast.net>  
**Sent:** Sunday, August 16, 2020 9:27 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

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Thank you for protecting our urban forest.

Cleo Faraone

[cleofaraone@comcast.net](mailto:cleofaraone@comcast.net)

521 NE 88th St

Seattle, Washington 98115

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**From:** Martha Pruitt <info@email.actionnetwork.org>  
**Sent:** Sunday, August 16, 2020 9:37 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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- Making clear that all exceptional trees removed during development must be replaced per

SMC 25.11.090

- Tightening tree removal requirements for exceptional trees as hazard trees

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Thank you for protecting our urban forest.

Martha Pruitt

[harleyquin206@gmail.com](mailto:harleyquin206@gmail.com)

814 S Rose St

Seattle , Washington 98108

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**From:** Jalair Box <info@email.actionnetwork.org>

**Sent:** Sunday, August 16, 2020 10:08 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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The following changes to the draft Director's Rule are needed:

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Thank you for protecting our urban forest.

Jalair Box

[jalairbox@gmail.com](mailto:jalairbox@gmail.com)

5450 Leary Ave NW, Apt 240

Seattle, Washington 98107

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**From:** Adrianna Culver <info@email.actionnetwork.org>

**Sent:** Sunday, August 16, 2020 10:31 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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- Add “All replacement trees regardless of size are protected trees and can’t be removed.”
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- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats and need to be considered at the beginning of the development process. The language of this SEPA code section should be included in the Director’s Rule to be certain that the code is complied with.
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Thank you for protecting our urban forest.

Adrianna Culver

[adrianna.culver@gmail.com](mailto:adrianna.culver@gmail.com)

10033 Interlake Ave N  
Seattle, Washington 98133

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**From:** kevin orme <info@email.actionnetwork.org>  
**Sent:** Sunday, August 16, 2020 10:37 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

to the City of Seattle, Department of Construction and Inspections -

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, **\*\*most definitely including\*\*** tree service provider requirements.

Seattle must move forward NOW. This process of increasing protection for our urban forest was first proposed by the Seattle City Council over 11 years ago and is long overdue. The additional almost TWO MORE YEAR DELAY being sought by the Master Builders and similar groups is simply unacceptable! Our urban forest climate crisis is already well underway - such a delay would simply mean we'd have this same conversation two years from now and they'd be asking for two more years' delay, and so on. Stop this endless procrastination and adopt the updated rule with the amendments suggested below, PLEASE!

It's definitely worth pointing out the following updates in the new draft Director's Rule are great steps forward - thanks for adding them! - to wit:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as **\*\*protected trees\*\***, at the start of the platting and short platting process - this definitely helps avoid them getting cut down early on and then 'oh well'.....

- Requiring Tree Care Providers to register with the City, the same way SDOT already does and has done for a long time;
- **Continuing protection of tree groves as exceptional trees**, even if a tree is removed from the grove
- Making clear that **all exceptional trees removed** during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees

However, it's also true that these next set of changes are absolutely needed to abide by earlier executive orders as well as the intent of the Tree Ordinance itself (protecting Seattle's urban canopy):

The following changes to the draft Director's Rule are needed:

- Please change the Subject Title to remove the words "land division" and replace them with "Development"
- **PURPOSE AND BACKGROUND.** add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."
- Also add the statement "The purpose of this Director's Rule is to protect and enhance the urban tree canopy of Seattle. Protecting Seattle's urban trees has been shown to have the support of the Citizens of Seattle multiple times over publicly and we hereby acknowledge and honor that intent with this updated Director's Rule.
- **SECTION 1.** Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as "a group of 3 or more significant trees with overlapping or touching crowns." Include street trees in groves.
- Add "Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages."
- Add "All replacement trees regardless of size are protected trees and can't be removed."

- SECTION 2. Change the heading to “TREE PROTECTION”. Remove references to “Exceptional Trees” only and change to “Trees”. e.g., change “Exceptional Tree Protection Areas” to “Tree Protection Areas”.
- SECTION 4. Add “The Director shall have the authority to allow replacement trees on both public and private property to meet the goals and objectives of race and social justice under Seattle’s Equity and Environment Initiative.”
- Under SMC 25.11.090 the Director has the authority to require “one or more trees” to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must \*absolutely also\* rise in direct proportion to the size of the removed tree. The city cannot wait 80 years to replace an 80-year-old western red cedar tree or similar Douglas Fir, Maple or other exceptional tree and expect to maintain any realistic or science-backed canopy goals when these large exceptional trees keep getting removed during development.

Nor is replacement simply enough - it assumes the stewardship of replacement trees will actually be sufficiently funded, that it will consistently and effectively be managed over the several early years needed to ensure new trees survive. Finally, the carbon capture and environmental services these large exceptional trees perform INCREASE over their long lifespan, a scientific fact. Continually allowing them to be removed and 'maybe' replaced is simply irresponsible and serves short term greed, not long-term climate, habitat and canopy goals for urban Seattle.

- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats and need to be considered at the beginning of the development process. The language of this SEPA code section should be included in the Director’s Rule to be certain that the code is complied with.
- SECTION 6. SDCI should adopt SDOT’s registration process and requirements to assist Tree Care Providers in complying with city code and regulations.
  - Reduce the number of citations that will remove a Tree Care Provider from being registered with the city to no more than 2 per year.
  - Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor’s license to ensure they have workers’

compensation.

- Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued.

- Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done, documented IN ADVANCE of any tree-related activity, period.

Thank you for protecting our urban forest.

kevin orme

[ovaltinelatte@hotmail.com](mailto:ovaltinelatte@hotmail.com)

502 N 80th St

Seattle, Washington 98103

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**From:** Marci Armitstead <arimits@comcast.net>

**Sent:** Sunday, August 16, 2020 11:02 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches

- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees

The following changes to the draft Director’s Rule are needed:

- Change Subject Title to remove words “land division” and replace with “Development”
- PURPOSE AND BACKGROUND. add “SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city.”
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the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.

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Thank you for protecting our urban forest.

Marci Armitstead

[armits@comcast.net](mailto:armits@comcast.net)

419 McGraw

Seattle, Washington 98109

---

**From:** Steven Ramos <info@email.actionnetwork.org>  
**Sent:** Sunday, August 16, 2020 11:16 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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Thank you for protecting our urban forest.

Steven Ramos

[stevenqcreative@gmail.com](mailto:stevenqcreative@gmail.com)

4229 BROOKLYN AVE NE Apt 4

SEATTLE, Washington 98105

**From:** Susan Fried <info@email.actionnetwork.org>  
**Sent:** Sunday, August 16, 2020 11:21 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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Woodinville, and Duvall all define a tree grove as “a group of 3 or more significant trees with overlapping or touching crowns.” Include street trees in groves.

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People in places with more trees are healthier and live longer.

Thank you for protecting our urban forest.

Susan Fried

[s45fried@yahoo.com](mailto:s45fried@yahoo.com)

3020 NE 113th St

Seattle, Washington 98125

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**From:** Robert Jellinek <info@email.actionnetwork.org>

**Sent:** Monday, August 17, 2020 12:03 AM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

Robert Jellinek

[robert.jellinek@gmail.com](mailto:robert.jellinek@gmail.com)

824a s orcas st

Seattle, Washington 98108

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**From:** Erika Nedderman <info@email.actionnetwork.org>

**Sent:** Monday, August 17, 2020 12:11 AM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

Erika Nedderman

[Ehnedderman@gmail.com](mailto:Ehnedderman@gmail.com)

7313 17th Avenue Northwest

Seattle, Washington 98117

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**From:** Susan Ward <barrettmw@msn.com>

**Sent:** Monday, August 17, 2020 12:48 AM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI’s Director’s Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

I urge you to pass, very soon, a new "tree code" which will protect and increase our tree canopy; which will protect the large and mature trees of our city. This is vital to the health and well-being of all our citizens. Our new tree code must take into account the value of trees to Seattle's air and water, to cooler summer temperatures, to preventing run-off into our shared drainage/sewer system and preventing erosion of our hills, and to promoting tranquility and peace of mind in our neighborhoods.

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

Susan Ward

Susan Ward

[barrettmw@msn.com](mailto:barrettmw@msn.com)

10330 Wallingford N

Seattle, Washington 98133

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**From:** Marsha Adams <adams\_marsha@fastmail.fm>  
**Sent:** Monday, August 17, 2020 2:02 AM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please Strengthen Seattle's Tree Ordinance

**CAUTION: External Email**

Sandra Pinto de Bader,

Seattle's trees and urban forest are vital to keeping our city healthy and livable. Trees and the urban forest comprise a vital green infrastructure. Trees reduce air pollution, storm water runoff and climate impacts like heat island effects, while providing essential habitat for birds and other wildlife. They are important for the physical and mental health of our residents.

Seattle's rapid growth and an outdated tree ordinance are reducing these beneficial effects as trees are removed and not replaced. It is urgent to act now to stop this continued loss of trees, particularly large mature trees and tree groves. It is important to promote environmental equity as trees are replaced.

Please update Seattle's Tree Protection Ordinance as recommended in the latest draft by the Seattle Urban Forestry Commission.

Here are the key provisions that need to be in the updated tree ordinance:

1. Expand the existing Tree Removal and Replacement Permit Program, including 2-week public notice and posting on-site, as used by the Seattle Department of Transportation (SDOT) – to cover all Significant Trees (6" and larger diameter at breast height (DBH)) on private property in all land use zones, both during development and outside development.
2. Require the replacement of all Significant Trees removed with trees that in 25 years will reach equivalent canopy volume – either on site or pay a replacement fee into a City Tree Replacement and Preservation Fund. Allow the Fund to also accept fines, donations, grants and set up easements.
3. Retain current protections for Exceptional Trees and reduce the upper threshold for Exceptional Trees to 24" DBH, protect tree groves and prohibit Significant Trees being removed on undeveloped lots.
4. Allow removal of no more than 2 Significant non-Exceptional Trees in 3 years per lot outside development
5. Establish one citywide database for applying for Tree Removal and Replacement Permits and to track changes in the tree canopy.
6. Post online all permit requests and permit approvals for public viewing.
7. Expand SDOT's existing tree service provider's registration and certification to register all Tree Service Providers (arborists) working on trees in Seattle.
8. Provide adequate funding in the budget to implement and enforce the updated ordinance.

Marsha Adams

[adams\\_marsha@fastmail.fm](mailto:adams_marsha@fastmail.fm)

1715 SE Mason St Apt A

Shelton, Washington 98584

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**From:** Jesun Firoz <info@email.actionnetwork.org>

**Sent:** Monday, August 17, 2020 3:28 AM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees

The following changes to the draft Director's Rule are needed:

- Change Subject Title to remove words "land division" and replace with "Development"
- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."
- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as "a group of 3 or more significant trees with overlapping or touching crowns." Include street trees in groves.
- Add "Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to

maintain a diversity of tree species and ages.”

- Add “All replacement trees regardless of size are protected trees and can’t be removed.”
- SECTION 2. Change the heading to “TREE PROTECTION”. Remove references to “Exceptional Trees” only and change to “Trees”. e.g., change “Exceptional Tree Protection Areas” to “Tree Protection Areas”.
- SECTION 4. Add “The Director shall have the authority to allow replacement trees on both public and private property to meet the goals and objectives of race and social justice under Seattle’s Equity and Environment Initiative.”
- Under SMC 25.11.090 the Director has the authority to require “one or more trees” to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.
- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats and need to be considered at the beginning of the development process. The language of this SEPA code section should be included in the Director’s Rule to be certain that the code is complied with.
- SECTION 6. SDCI should adopt SDOT’s registration process and requirements to assist Tree Care Providers in complying with city code and regulations. Reduce the number of citations that will remove a Tree Care Provider from being registered with the city to no more than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor’s license to ensure they have workers’ compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

Jesun Firoz

[jesunsahariar@gmail.com](mailto:jesunsahariar@gmail.com)

2700 NE 125TH ST APT 402  
Seattle, Washington 98125

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**From:** Holly Delaney <info@email.actionnetwork.org>  
**Sent:** Monday, August 17, 2020 6:05 AM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

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Thank you for protecting our urban forest.

Holly Delaney

[hollyjdelaney@gmail.com](mailto:hollyjdelaney@gmail.com)

7548 Sunnyside Ave N

Seattle, Washington 98103

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**From:** Caroline Thompson <info@email.actionnetwork.org>  
**Sent:** Monday, August 17, 2020 6:27 AM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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Within the last year our street lost some incredibly old and beautiful trees to a property developer who has cleared his property. This included the loss of trees that were more than 30" in diameter. If we are a city that really cares about climate change and a livable environment, we need to start implementing and enforcing regulations that make that a reality.

Thank you for protecting our urban forest.

Caroline Thompson

[CThomp1603@gmail.com](mailto:CThomp1603@gmail.com)

10302 14th Avenue NW

Seattle, Washington 98177

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From: lisa\_a\_valdez@everyactioncustom.com <lisa\_a\_valdez@everyactioncustom.com>  
Sent: Monday, August 17, 2020 7:06 AM  
To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCI is no longer concerned about the fate of the smaller, non-exceptional trees.
- Protect red alders, black cottonwoods, and bitter cherries. These native trees provide important resources to birds and other wildlife and contribute to our sense of place in Seattle. Following the "right tree, right place" philosophy, these native trees can safely thrive and should be protected like other species.
- Expand the definition of tree groves to stands of six or more trees at least six inches in diameter, including street trees. Tree groves provide important habitat for birds and are becoming less common outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove.
- Require public notice postings on development site and online for removal of Exceptional trees, even when hazardous, to ensure community members know when and where legal tree removal is occurring.
- Require replacement for trees removed from groves and removed hazard trees.
- Align SDCI's proposed Tree Care Provider Acknowledgement with SDOT's Tree Service Provider Registration. Do not automatically renew this form annually. It should be updated each year. Reduce the number of infractions tree service providers can incur in a year before they are removed from the City's list to do business from more than three infractions to more than two infractions.
- Section 4: Preference for planting off-site replacement trees on public property is restrictive. The Director should be able to allow replacement trees not only on public property, but also on private property, where desired by the property owner, in order to meet the City's goals and objectives of race and social justice under Seattle's Equity and Environment Initiative.

The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
Lisa Valdez  
2907 Montlake Blvd E Seattle, WA 98112-2017 [lisa\\_a\\_valdez@yahoo.com](mailto:lisa_a_valdez@yahoo.com)

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**From:** Joanne Moring <[joiemoring@comcast.net](mailto:joiemoring@comcast.net)>

**Sent:** Monday, August 17, 2020 7:13 AM

**To:** Pinto de Bader, Sandra <[Sandra.Pinto\\_de\\_Bader@Seattle.gov](mailto:Sandra.Pinto_de_Bader@Seattle.gov)>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

Joanne Moring

[joiemoring@comcast.net](mailto:joiemoring@comcast.net)

1011 N 38th St

Seattle, Washington 98103

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**From:** Jack Dunnington <info@email.actionnetwork.org>  
**Sent:** Monday, August 17, 2020 7:21 AM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

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Thank you for protecting our urban forest.

Jack Dunnington

[jdunnington94@gmail.com](mailto:jdunnington94@gmail.com)

7814 39th Ave SW

Seattle, Washington 98136

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**From:** Analia Bertoni <info@email.actionnetwork.org>  
**Sent:** Monday, August 17, 2020 8:01 AM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

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Analia Bertoni

[analiachi@yahoo.com](mailto:analiachi@yahoo.com)

821 South Thistle Street

Seattle, Washington 98108

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**From:** Andra Bell <mcbell@seanet.com>

**Sent:** Monday, August 17, 2020 8:02 AM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

Sandra Pinto de Bader,

Yes, I'm signing on to the prewritten form letter, because there is no need to reinvent the wheel here. We must start protecting our tree canopy in Seattle and beyond. It is tragic what City Light does to the trees anyway, all in the name of keeping power lines clear...the V cut is a tragedy. Seriously? We can't start putting utilities underground? In the mean time, at least we can keep the big trees that exist on public and private land. So.

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees

The following changes to the draft Director's Rule are needed:

- Change Subject Title to remove words "land division" and replace with "Development"
- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the

city.”

- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as “a group of 3 or more significant trees with overlapping or touching crowns.” Include street trees in groves.
- Add “Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages.”
- Add “All replacement trees regardless of size are protected trees and can’t be removed.”
- SECTION 2. Change the heading to “TREE PROTECTION”. Remove references to “Exceptional Trees” only and change to “Trees”. e.g., change “Exceptional Tree Protection Areas” to “Tree Protection Areas”.
- SECTION 4. Add “The Director shall have the authority to allow replacement trees on both public and private property to meet the goals and objectives of race and social justice under Seattle’s Equity and Environment Initiative.”
- Under SMC 25.11.090 the Director has the authority to require “one or more trees” to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.
- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats and need to be considered at the beginning of the development process. The language of this SEPA code section should be included in the Director’s Rule to be certain that the code is complied with.
- SECTION 6. SDCI should adopt SDOT’s registration process and requirements to assist Tree Care Providers in complying with city code and regulations. Reduce the number of citations that will remove a Tree Care Provider from being registered with the city to no more than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor’s license to ensure they have workers’ compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a

certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

Sincerely,  
Andra Bell  
Seattle

Andra Bell  
[mcbell@seanet.com](mailto:mcbell@seanet.com)  
740 N 68th St  
Seattle, Washington 98103

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**From:** Joyce Moty <info@email.actionnetwork.org>  
**Sent:** Monday, August 17, 2020 8:17 AM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please Protect Seattle's Trees

**CAUTION: External Email**

Sandra Pinto de Bader,

Seattle's trees and urban forest are vital to keeping our city healthy and livable. Trees and the urban forest comprise a vital green infrastructure. Trees reduce air pollution, storm water runoff and climate impacts like heat island effects, while providing essential habitat for birds and other wildlife. They are important for the physical and mental health of our residents.

Seattle's rapid growth and an outdated tree ordinance are reducing these beneficial effects as trees are removed and not replaced. It is urgent to act now to stop this continued loss of trees, particularly large mature trees and tree groves. It is important to promote environmental equity as trees are replaced.

Please update Seattle's Tree Protection Ordinance as recommended in the latest draft by the Seattle Urban Forestry Commission.

Here are the key provisions that need to be in the updated tree ordinance:

1. Expand the existing Tree Removal and Replacement Permit Program, including 2-week public notice and posting on-site, as used by the Seattle Department of Transportation (SDOT) – to cover all Significant Trees (6" and larger diameter at breast height (DBH)) on private property in all land use zones, both during development and outside development.
2. Require the replacement of all Significant Trees removed with trees that in 25 years will reach equivalent canopy volume – either on site or pay a replacement fee into a City Tree Replacement and Preservation Fund. Allow the Fund to also accept fines, donations, grants and set up easements.
3. Retain current protections for Exceptional Trees and reduce the upper threshold for Exceptional Trees to 24" DBH, protect tree groves and prohibit Significant Trees being removed on undeveloped lots.
4. Allow removal of no more than 2 Significant non-Exceptional Trees in 3 years per lot outside development
5. Establish one citywide database for applying for Tree Removal and Replacement Permits and to track changes in the tree canopy.
6. Post online all permit requests and permit approvals for public viewing.
7. Expand SDOT's existing tree service provider's registration and certification to register all Tree Service Providers (arborists) working on trees in Seattle.
8. Provide adequate funding in the budget to implement and enforce the updated ordinance.

Joyce Moty

[jmmoty@gmail.com](mailto:jmmoty@gmail.com)

1531 30th Ave. S.

Seattle, Washington 98144

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**From:** Kevin Judson <cinetica@spanishcaravan.com>

**Sent:** Monday, August 17, 2020 8:42 AM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
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- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
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The following changes to the draft Director's Rule are needed:

- Change Subject Title to remove words "land division" and replace with "Development"
- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."
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- Add "Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to

maintain a diversity of tree species and ages.”

- Add “All replacement trees regardless of size are protected trees and can’t be removed.”
- SECTION 2. Change the heading to “TREE PROTECTION”. Remove references to “Exceptional Trees” only and change to “Trees”. e.g., change “Exceptional Tree Protection Areas” to “Tree Protection Areas”.
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Thank you for protecting our urban forest.

Kevin Judson

[cinetica@spanishcaravan.com](mailto:cinetica@spanishcaravan.com)

7544 Sunnyside Ave N  
Seattle, Washington 98103

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**From:** Sandra Lipo <info@email.actionnetwork.org>  
**Sent:** Monday, August 17, 2020 8:45 AM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor's license to ensure they have workers' compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

Sandra Lipo

[lipo.sandra@gmail.com](mailto:lipo.sandra@gmail.com)

3712 W Prosper St

Seattle, Washington 98199

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From: lassiewebster@everyactioncustom.com <lassiewebster@everyactioncustom.com>

Sent: Monday, August 17, 2020 8:52 AM

To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCI is no longer concerned about the fate of the smaller, non-exceptional trees.
- Protect red alders, black cottonwoods, and bitter cherries. These native trees provide important resources to birds and other wildlife and contribute to our sense of place in Seattle. Following the "right

tree, right place" philosophy, these native trees can safely thrive and should be protected like other species.

- Expand the definition of tree groves to stands of six or more trees at least six inches in diameter, including street trees. Tree groves provide important habitat for birds and are becoming less common outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove.
- Require public notice postings on development site and online for removal of Exceptional trees, even when hazardous, to ensure community members know when and where legal tree removal is occurring.
- Require replacement for trees removed from groves and removed hazard trees.
- Align SDCI's proposed Tree Care Provider Acknowledgement with SDOT's Tree Service Provider Registration. Do not automatically renew this form annually. It should be updated each year. Reduce the number of infractions tree service providers can incur in a year before they are removed from the City's list to do business from more than three infractions to more than two infractions.
- Section 4: Preference for planting off-site replacement trees on public property is restrictive. The Director should be able to allow replacement trees not only on public property, but also on private property, where desired by the property owner, in order to meet the City's goals and objectives of race and social justice under Seattle's Equity and Environment Initiative.

The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
Lassie Webster  
2727 NE 91st St Seattle, WA 98115-3467  
[lassiewebster@gmail.com](mailto:lassiewebster@gmail.com)

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**From:** Margaret Martin <info@email.actionnetwork.org>  
**Sent:** Monday, August 17, 2020 8:54 AM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division,

including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

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- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees

The following changes to the draft Director's Rule are needed:

- Change Subject Title to remove words "land division" and replace with "Development"
- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."
- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as "a group of 3 or more significant trees with overlapping or touching crowns." Include street trees in groves.
- Add "Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages."
- Add "All replacement trees regardless of size are protected trees and can't be removed."
- SECTION 2. Change the heading to "TREE PROTECTION". Remove references to "Exceptional Trees" only and change to "Trees". e.g., change "Exceptional Tree Protection

Areas” to ”Tree Protection Areas”.

- SECTION 4. Add “The Director shall have the authority to allow replacement trees on both public and private property to meet the goals and objectives of race and social justice under Seattle’s Equity and Environment Initiative.”
- Under SMC 25.11.090 the Director has the authority to require “one or more trees” to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.
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Thank you for protecting our urban forest.

Margaret Martin

[billybobmarg@yahoo.com](mailto:billybobmarg@yahoo.com)

1024 NE 127th St

Seattle, Washington 98125-4006

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**From:** Martha Baskin <mobaskin@earthlink.net>

**Sent:** Monday, August 17, 2020 8:54 AM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by the Master Builders Association, among others in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

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Thank you for protecting our urban forest.

Martha Baskin

[mobaskin@earthlink.net](mailto:mobaskin@earthlink.net)

7534 17th Avenue NW, #B

Seattle, Washington 98117

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**From:** Timothy Colman <info@email.actionnetwork.org>

**Sent:** Monday, August 17, 2020 9:05 AM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

We ought to plant trees that live 1000 years, call that profit.

Timothy Colman

[calmspot@gmail.com](mailto:calmspot@gmail.com)

6521 23RD AVE NE

Seattle, Washington 98115

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**From:** Denise Mahnke <wnps@wnps.org>

**Sent:** Monday, August 17, 2020 9:30 AM

**To:** SCI\_DRulesComments <SCI\_DRulesComments@seattle.gov>

**Cc:** Durkan, Jenny <Jenny.Durkan@seattle.gov>; LEG\_CouncilMembers <council@seattle.gov>; Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** SDCI Director's Rule 13-2020 Designation of Exceptional and Significant Trees

**CAUTION: External Email**

Hello;

Please accept this public comment letter from the Washington Native Plant Society for review during the public comment period.

Thank you.

Respectfully,

Denise Mahnke

WNPS Business Manager

**Washington Native Plant Society**

6310 74<sup>th</sup> St.; Ste. 215E

Seattle, WA 98115

(206)527-3210

*To promote the appreciation and conservation of Washington's native plants and their habitats through study, educations, and advocacy.*



**Washington Native Plant Society**  
*Appreciate, Conserve, and Study Our Native Flora*

6310 NE 74<sup>th</sup> St., Ste 215E, Seattle, Washington 98115  
(206) 527-3210

August 17, 2020

**Public Comments**

Department of Construction and Inspections

700 5<sup>th</sup> Ave, #2000

Seattle, WA 98104

via email to [SDCI\\_DRulesComments@seattle.gov](mailto:SDCI_DRulesComments@seattle.gov)

RE: SDCI Director's Rule 13-2020 Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements

**To Whom It May Concern:**

On behalf of the Washington Native Plant Society (WNPS), thank you for your work to update the SDCI Director's Rule on exceptional trees and expanding it to cover significant trees, tree protection, retention, and tree removal during land division, including tree service provider requirements. WNPS urges you to strengthen the proposed Director's Rule per the recommendations below and to adopt and implement the Rule without delay.

WNPS promotes the appreciation and conservation of Washington's native plants through study, education, and advocacy. Seattle's urban forest contains at least three dozen tree species native to Washington state. From towering Douglas firs to vine maples in the understory, these native trees contribute to the city's unmistakable sense of place, support wildlife, and provide important benefits to the people who live, work, and play in the city.

While the proposed Director's Rule offers improvements for tree protection, it is based on the current, ineffective tree protection ordinance. As WNPS wrote to the Seattle City Council in July of 2019, the City needs an updated tree protection ordinance to slow and reverse tree loss.

A new code will need to include stronger, smarter, and simpler tree protections, including tree removal and replacement permits, a fee-in-lieu payment mechanism, and strong funding for code enforcement. The City also needs oversight and accountability for all urban forestry and tree management decisions in the form of a central Urban Forestry Division, preferably housed at the Office of Sustainability and Environment. And we need more city arborists who have the knowledge and skills to help the City make informed management decisions regarding its critical green infrastructure.

Below are WNPS's specific comments and recommendations regarding DR 13-2020

**WNPS Supports the following in proposed Director's Rule 13-2020:**

- Reducing the upper threshold on exceptional trees to 24 inches diameter at standard height (DSH) from 30 inches DSH.
- Clarifying the definition of a significant tree.
- Requiring tree care provider registration with the City.
- Acknowledging tree protection and retention starting with the platting process.

- Continuing tree grove protection even if a tree is removed from a grove.
- Acknowledging that exceptional trees removed during development must be replaced under existing SMC 25.11.090.
- Tightening requirements for removal of exceptional trees as hazard trees.
- Expanding the scope of the Director’s Rule to include more protections and clarity.
- Maintaining lower exceptional tree DSH threshold for slower growing or typically smaller stature Pacific Northwest native trees, such as Gary Oak, Madrona, and Pacific Yew.
- Implementing a worksheet to track tree loss and replacement on private property, knowing that the collected data will be digitized and compiled in a publicly accessible database.

WNPS recommends strengthening the proposed Director’s Rule in the following ways:

#### GLOBAL COMMENT

To fulfil the purpose and intent of existing land use and tree protection codes, as well as to achieve the environmental goals set in the Seattle 2035 Comprehensive Plan, the City must maximize retention of exceptional trees AND trees at least six inches in diameter (SMC 23.22, SMC 25.11.010, 2035 Seattle Comprehensive Plan EN 1.1 & EN 1.2). Maximizing tree retention must be the goal during land division AND throughout any subsequent development on all lots in all zones across the city. The proposed Rule as written does not communicate this and seems to imply that maximizing tree retention is limited to exceptional trees during platting.

Please review and revise the rule accordingly. In addition, WNPS recommends that new text be added to the fourth paragraph of the Purpose and Background section so that it reads:

"Applicants shall protect and retain significant and exceptional trees as required per Chapter 25.11 and as further clarified in this Rule. In addition, removal of any stem, root or other tree part on an existing exceptional tree is prohibited unless that action specifically responds to an adopted SMC requirement applicable only when new development is proposed. To meet Seattle’s 2035 Comprehensive Plan goals and fulfill the purpose and intent of SMC 23.22 and SMC 25.11, all development projects in all zones across the city shall be designed to maximize the retention of existing trees six inches DSH and larger."

#### SECTION 1: DEFINITIONS

1. *Trees not considered exceptional, first bullet point:* In this paragraph, the proposed rule excludes trees that “have defects or damage that now or in the foreseeable future will result in increased poor health condition and/or limited life expectancy.” This language is so vague and general that one could argue it applies to nearly any tree in an urban environment. Please clarify to avoid a loose definition that would result in the over-identification of hazard trees. Additionally, recognize and emphasize that trees with defects or damage are typically highest value wildlife trees and should be protected unless they meet the removal requirements of section 3.1.
2. *Trees not considered exceptional, second bullet point:* Please protect native trees. WNPS asks that the categorical exclusion of red alders, black cottonwoods, and bitter cherries from exceptional tree status be removed. These native species contribute importantly to our urban ecology. Following the “right tree, right place” philosophy, red alders, black cottonwoods, and bitter cherries can safely thrive and deserve protections.

3. *Tree groves*: Please revise the definition of tree groves. Requiring grove trees to have a DSH of at least twelve inches is inconsistent with protections for significant trees and adds unnecessary complexity to the Rule. WNPS also recommends reducing the number of trees required to meet the definition of a grove. Neighboring cities of Kirkland, Duvall, and Woodinville require just three trees six inches DSH or greater with contiguous canopy to be protected as a grove. WNPS further recommends removing the exclusion of street trees from tree groves. Street trees are no different from trees located across property lines on adjacent lots and there is no ecologic basis to exclude them. Any smaller trees and/or vegetation (excluding any species on the noxious weed list) within the grove should be protected as well.

## SECTION 2: EXCEPTIONAL TREE PROTECTION.

1. Please remove "EXCEPTIONAL" from section heading. The section applies to all trees greater than six inches DSH.
2. *Section 2.1. Exceptional Trees During Platting*. Please remove "Exceptional" from subsection heading. The platting rules apply to all trees six inches DSH and larger.
3. *Section 2.2. Allowable Encroachment in Exceptional Tree Protection Areas During Proposed Development*. Again, please remove "Exceptional" from subsection heading. The rule applies to all trees retained during development.
4. *Section 2.3. Tree Groves*. Tree grove protections could be improved by also protecting smaller trees, shrubs and ground cover that may exist in a grove's understory, particularly native species.

## SECTION 3: EXCEPTIONAL TREE REMOVAL

1. *Section 3.1. Tree Risk Assessment Required for Tree Removal. Second paragraph*. Please add a requirement for the applicant to post a public notice of hazard tree removal. For example, "This application will require the applicant to submit both an arborist report, a tree risk assessment, and display a public notice at the development site and online for at least 14 days before the tree can be removed." This ensures that neighbors will know when and where legal tree removal is occurring. This should be required for all exceptional trees that SDCI permits for removal and replacement.
2. *Section 3.1. Tree Risk Assessment Required for Tree Removal. Third paragraph and associated bulleted list*: A Tree Risk Assessment Qualified (TRAQ) tree service provider will understand the evaluative criteria established by the International Society of Arboriculture (ISA). The bulleted list attempts to condense too much into too short a space and risks adding confusion for property owners. Please remove the bulleted list all together and revise paragraph 3 to read: "The tree risk assessment must conclude that the exceptional tree is a "high" risk hazard using the tree risk assessment methodology and criteria established by the International Society of Arboriculture and that the risk cannot be mitigated by pruning, cabling, bracing or other methods that would preserve the tree."
3. *Section 3.1. Tree Risk Assessment Required for Tree Removal. Fourth paragraph*. Please revise definition of "qualified professional" for clarity. It is unclear what "three years' experience in tree evaluation" means. Candidates for ISA Tree Risk Assessment Qualification must already have three years of full-time experience in arboriculture or a combination of education and practical experience. Does a "qualified professional" per DR 13-2020 require an additional three years' experience? What exactly does "tree evaluation" mean? Does that mean performing tree risk assessments?

If so, how would a younger TRAQ certified arborist gain experience if experience is required to receive work in the field?

4. *Section 3.1. Tree Risk Assessment Required for Tree Removal. Fifth paragraph and associated bulleted list. The third bullet point:* “International Society of Arborists” should be “International Society of Arboriculture.” The “and/or” conjunctions obscure the meaning of this bullet point and the education requirements are not clearly connected to arboriculture or forestry. These educational requirements may be redundant anyway, as the ISA Certified Arborist credential has clear experiential and educational requirements for eligibility and maintenance. Further educational requirements by the city may disproportionately impact arborists who may have not had the resources for post-secondary education. If the educational requirements are necessary, the point could be clarified by the following:
  - International Society of Arboriculture (ISA) Certified Arborist with at least one of the following:
    - Associate Degree with at least 2 courses related to arboriculture or urban forestry;
    - Two years of college-level credits with at least 2 courses related to arboriculture or urban forestry; and/or
    - 120 Continuing Education Units relating to tree care.

#### SECTION 4: REQUIRED MITIGATION FOR ALLOWED TREE REMOVAL

1. *First paragraph:* The first sentence reads “Mitigation is required for each exceptional tree that is not hazardous and is removed in association with development in all zones.” Is mitigation *not* required for trees that are not removed in association with development? Mitigation for removal of exceptional hazard trees ought to be required, too. They were exceptional trees before they became hazardous. WNPS understands that the intent here may be to not burden property owners with the replacement of a tree which was removed through no fault of their own. If the city had a fee-in lieu payment scheme for trees which developers were unable to retain or replace on-site, funds from those coffers could be used to assist property owners with these costs in an equitable way.
2. *First paragraph:* Last sentence ends “...preference for off-site replacement shall be on public property.” This preference may prove restrictive and unhelpful as the city works to meet its racial and social justice goals under Seattle’s Equity and Environment Initiative. The Director should have the authority to allow trees to be planted on private property, especially where areas with low canopy and “Disadvantaged” scores on the Racial and Social Equity Index coincide, and where desired by the property owner. Our suggested revision: “...preference for off-site replacement shall be on public or private property, where desired by the property owner, in order to meet the City’s goals and objectives of racial and social justice under Seattle’s Equity and Environment Initiative.”
3. *Third paragraph:* Need to add a timing requirement. By what time is the applicant required to replace the removed tree? What if the tree is removed at the start of summer? It would seem wisest to wait to plant until autumn. We suggest, “All replacement trees shall be planted in October through December and no later than 12 months after removal. The applicant shall prepare and, if necessary, amend the existing soil conditions...”

4. *Fourth paragraph:* To aid the survival of replacement trees, add that replacement trees shall be watered during summer months for the first 5 years. Our suggestion: "The property owner of the site shall water replacement trees from June through September and ensure that the trees remain healthy for at least five years after planting. The property owner shall allow inspection by the City."
5. *Table 1. Size and Thresholds for Selected Specimen Exceptional Trees:* A single column header spans two columns and is not easily understood. We suggest revising to two headings and adding notation to indicate native species as below:

Tree Species	DSH at which Species Becomes Exceptional
ALDER, Sitka – <i>Alnus sinuate</i>	6"
APPLE, Orchard (Common) – <i>Malus sp.</i>	20"
ASH, European – <i>Fraxinus excelsior</i>	22"
ASPEN, Quaking – <i>Populus tremuloides</i> *	12"
...	...
...	...

\*Native to Washington state.

6. *Table 1. Record for WILLOW species:* All specific epithets, subspecies, and variety names should be lower case, and species varieties should be indicated by "var." instead of "ver." The entry should read:

WILLOW (All native species) – <i>Salix sp.</i> ( <i>geyeriana</i> var. <i>meleina</i> , <i>eriocephala</i> ssp. <i>mackenzieana</i> , <i>hookeriana</i> , <i>piperi</i> , <i>scouleriana</i> , <i>sitchensis</i> )	8"
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#### SECTION 5: USE OF THIS RULE IN THE APPLICATION OF SEPA

This section of the proposed Rule seems to imply that SEPA and mitigating measures only apply to exceptional trees that are rare, uncommon or unique, form a wildlife travelway, or if they are of substantial, aesthetic, educational, ecological, or economic value. That is not the case. SEPA protections are much broader. This section should adequately communicate as much.

SEPA protects trees and other vegetation beyond our biggest trees. SMC 25.05.675 N.2.a. states "...A high priority shall be given to the preservation and protection of special habitat types. Special habitat types include, but are not limited to, wetlands and associated areas (such as upland nesting areas), and spawning, feeding or nesting sites." Age and species diversity in our urban forest is critical for supporting an abundance and diversity of flora and fauna in Seattle. Please revise Section 5 to ensure the applications of SEPA are correctly stated.

## SECTION 6: TREE CARE PROVIDER ACKNOWLEDGEMENT

1. The proposed tree care provider acknowledgement would be improved by more closely mirroring SDOT's Tree Service Provider Registration. Consistency between departments will reduce confusion for professionals. Please change the title of the form to "SDCI Tree Service Provider Registration." Please require the following documentation to be included with the registration:
  - Washington State Contractor License (L&I)
  - City of Seattle Business License
  - Certificate of Insurance
  - Street Use Annual Vehicle Permit (if applicable)
2. Registration should not be automatically renewed each year. Please require annual registration to ensure that tree service provider information remains up-to-date and that tree professionals regularly review the code for any updated language or regulations.
3. Please reduce the number of citations during a one-year period before a tree service provider is removed from the City's list to do business from no more than three to no more than two.

Thank you for your work to update the Director's Rule. WNPS urges you to strengthen, adopt, and implement DR 13-2020 without delay. WNPS appreciates the improved tree protections the updated Rule will provide, but we note again that the City needs an updated tree protection ordinance. Please continue working with the Urban Forestry Commission to introduce legislation for City Council's consideration this year.

Respectfully,



Van Bobbitt, President  
Washington Native Plant Society



Becky Chaney, Conservation Committee Chair  
Washington Native Plant Society



Janka Hobbs, Central Puget Sound Chapter Chair  
Washington Native Plant Society

Cc: Mayor Jenny Durkan; [Jenny.Durkan@seattle.gov](mailto:Jenny.Durkan@seattle.gov)  
Seattle City Council; [council@seattle.gov](mailto:council@seattle.gov)  
Sandra Pinto de Bader; [Sandra.Pinto\\_de\\_Bader@seattle.gov](mailto:Sandra.Pinto_de_Bader@seattle.gov)

---

**From:** Mary Wallon <[info@email.actionnetwork.org](mailto:info@email.actionnetwork.org)>  
**Sent:** Monday, August 17, 2020 9:47 AM  
**To:** Pinto de Bader, Sandra <[Sandra.Pinto\\_de\\_Bader@Seattle.gov](mailto:Sandra.Pinto_de_Bader@Seattle.gov)>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without delay in adopting this updated Director's Rule with the amendments proposed below. This process protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees

The following changes to the draft Director's Rule are needed:

- Change Subject Title to remove words "land division" and replace with "Development"
- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."
- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as "a group of 3 or more significant trees with overlapping or touching crowns." Include street trees in groves.
- Add "Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages."

- Add “All replacement trees regardless of size are protected trees and can’t be removed.”
- SECTION 2. Change the heading to “TREE PROTECTION”. Remove references to “Exceptional Trees” only and change to “Trees”. e.g., change “Exceptional Tree Protection Areas” to “Tree Protection Areas”.
- SECTION 4. Add “The Director shall have the authority to allow replacement trees on both public and private property to meet the goals and objectives of race and social justice under Seattle’s Equity and Environment Initiative.”
- Under SMC 25.11.090 the Director has the authority to require “one or more trees” to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.
- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats and need to be considered at the beginning of the development process. The language of this SEPA code section should be included in the Director’s Rule to be certain that the code is complied with.
- SECTION 6. SDCI should adopt SDOT’s registration process and requirements to assist Tree Care Providers in complying with city code and regulations. Reduce the number of citations that will remove a Tree Care Provider from being registered with the city to no more than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor’s license to ensure they have workers’ compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

Mary Wallon

[mwallon21@gmail.com](mailto:mwallon21@gmail.com)

9 West Armour Street

Seattle, Washington 98119

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**From:** Wallis Bolz <info@email.actionnetwork.org>  
**Sent:** Monday, August 17, 2020 9:47 AM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

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certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

Wallis Bolz, Green Seattle forest steward and Madison Valley resident

Wallis Bolz

[wallisbolz@gmail.com](mailto:wallisbolz@gmail.com)

2642 E Ward St

Seattle, Washington 98112

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**From:** Erika Langley <erika@drizzle.com>  
**Sent:** Monday, August 17, 2020 9:52 AM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

This should be a no-brainer. Heritage trees are irreplaceable. This is a classic example of Seattle's sacrificing the beauty and tradition of the city for greed and development. It is shameful.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

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Thank you for protecting our urban forest.

Erika Langley

[erika@drizzle.com](mailto:erika@drizzle.com)

1708 Nipsic Avenue

Bremerton , Washington 98310

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**From:** Marjorie Cogan <marjiecogan@bethshalomseattle.org>

**Sent:** Monday, August 17, 2020 10:09 AM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

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- SECTION 2. Change the heading to “TREE PROTECTION”. Remove references to “Exceptional Trees” only and change to “Trees”. e.g., change “Exceptional Tree Protection Areas” to “Tree Protection Areas”.
- SECTION 4. Add “The Director shall have the authority to allow replacement trees on both public and private property to meet the goals and objectives of race and social justice under Seattle’s Equity and Environment Initiative.”
- Under SMC 25.11.090 the Director has the authority to require “one or more trees” to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.
- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats and need to be considered at the beginning of the development process. The language of this SEPA code section should be included in the Director’s Rule to be certain that the code is complied with.
- SECTION 6. SDCI should adopt SDOT’s registration process and requirements to assist Tree Care Providers in complying with city code and regulations. Reduce the number of citations that will remove a Tree Care Provider from being registered with the city to no more than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor’s license to ensure they have workers’ compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

Marjorie Cogan

[marjiecogan@bethshalomseattle.org](mailto:marjiecogan@bethshalomseattle.org)

6800 35th Ave NE, Congregation Beth Shalom  
Seattle, Washington 98115

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**From:** Lon Kissinger <info@email.actionnetwork.org>  
**Sent:** Monday, August 17, 2020 10:14 AM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please Update Seattle's Tree Ordinance

**CAUTION: External Email**

Sandra Pinto de Bader,

Seattle's trees and urban forest are vital to keeping our city healthy and livable. Trees and the urban forest comprise a vital green infrastructure. Trees reduce air pollution, storm water runoff and climate impacts like heat island effects, while providing essential habitat for birds and other wildlife. They are important for the physical and mental health of our residents.

Seattle's rapid growth and an outdated tree ordinance are reducing these beneficial effects as trees are removed and not replaced. It is urgent to act now to stop this continued loss of trees, particularly large mature trees and tree groves. It is important to promote environmental equity as trees are replaced.

Please update Seattle's Tree Protection Ordinance as recommended in the latest draft by the Seattle Urban Forestry Commission.

Here are the key provisions that need to be in the updated tree ordinance:

1. Expand the existing Tree Removal and Replacement Permit Program, including 2-week public notice and posting on-site, as used by the Seattle Department of Transportation (SDOT) – to cover all Significant Trees (6" and larger diameter at breast height (DBH)) on private property in all land use zones, both during development and outside development.
2. Require the replacement of all Significant Trees removed with trees that in 25 years will reach equivalent canopy volume – either on site or pay a replacement fee into a City Tree Replacement and Preservation Fund. Allow the Fund to also accept fines, donations, grants

and set up easements.

3. Retain current protections for Exceptional Trees and reduce the upper threshold for Exceptional Trees to 24" DBH, protect tree groves and prohibit Significant Trees being removed on undeveloped lots.
4. Allow removal of no more than 2 Significant non-Exceptional Trees in 3 years per lot outside development
5. Establish one citywide database for applying for Tree Removal and Replacement Permits and to track changes in the tree canopy.
6. Post online all permit requests and permit approvals for public viewing.
7. Expand SDOT's existing tree service provider's registration and certification to register all Tree Service Providers (arborists) working on trees in Seattle.
8. Provide adequate funding in the budget to implement and enforce the updated ordinance.

Lon Kissinger

[lkissea@gmail.com](mailto:lkissea@gmail.com)

3615 CARR PL N

Seattle, Washington 98103

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**From:** John <john.nuler@gmail.com>

**Sent:** Monday, August 17, 2020 10:30 AM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Parks' Tree Protection Violations

**CAUTION: External Email**

Please post this to Urban Forestry.

What of the proposed changes address the different city departments' abuse of Tree Regulations with apparently zero enforcement possibilities with inter departments involved such as SDOT, DCI and Parks playing 'pass the buck' as shown here? Virtually all departments are involved.

August 13, 2020

Dear,

Seattle Parks and Recreation (SPR) is committed to adhering to Seattle's environmental codes for environmentally critical areas, and appreciate your sharing your concerns that the Orchard Street Ravine house demolition is failing to adhere to the ECAs.

Redi Karameto is working with the demolition contractor and with staff from SPR, SDCI, and Green Seattle Partnership to respond to the concerns you raise.

**PLANTINGS**—As Redi explained when you spoke by phone on August 7, in addition to the hydroseeding noted on the drawings, we will also plant a variety of vegetation to restore the ravine. The plant list was created by Green Seattle Partnership, who support SPR to maintain this ravine.

**TREE PROTECTION**—On August 10, Redi met onsite with the contractor, SPR arborist Mark Malone, and SDCI inspector Joe Eckhoff. Redi directed the contractor to stop work until they had reinstalled the tree-protection fence and provided a water sprinkler for the remainder of the demolition.

When Mark Malone inspected the tree for possible damage from the lumber that entered the tree-protection zone, he found no damage to the tree. Mark directed Redi to have the contractor reinstall the tree-protection fence and avoid the critical root zone.

Joe Eckhoff observed that the field changes, requested by the contractor to address field demolition access challenges, should have been routed through SDCI. We will update the drawings to show the field changes, and add the tree and plants information to update SDCI records. Joe also directed that the tree-protection fence be set in place, and a water sprinkler provided for the demolition.

Redi can provide you with updated drawings as soon as those are available.

**SDCI FOLLOW-UP**—We have been in touch with SDCI's Valerie Patton about your concerns, and she has followed up with SDCI reviewers and the Site Development Inspector. Her understanding is that SDCI normally does not deal with potential tree code violations on SPR property, but because the SDCI-issued permit required tree protection which apparently was not maintained, she plans to open a case and request an arborist report to determine whether tree protection was reestablished, whether there was tree damage, and what SPR is doing, going forward, to prevent damage. Val will follow up with SDCI review staff to verify whether a revision is required, and she will contact you about your concerns.

Thank you for strong commitment to protecting Seattle's environmentally critical areas. Please be assured that we share your commitment.

Sincerely,

Jesús Aguirre

Superintendent, Seattle Parks and Recreation

cc: Joe Eckhoff, Inspector, Seattle Department of Construction and Inspections

Dan Enrico, Construction Manager, Seattle Parks and Recreation

Redi Karameto, Senior Architect, Seattle Parks and Recreation

Mark Malone, Arborist, Seattle Parks and Recreation

Valerie Patton, Inspection Support Analyst, Seattle Department of Construction and Inspections

Andy Sheffer, Planning and Development Director, Seattle Parks and Recreation

Scott Stevens, Park Engineer, Seattle Parks and Recreation

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**From:** Louise Fox <info@email.actionnetwork.org>

**Sent:** Monday, August 17, 2020 10:31 AM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long

overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees

The following changes to the draft Director's Rule are needed:

- Change Subject Title to remove words "land division" and replace with "Development"
- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."
- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as "a group of 3 or more significant trees with overlapping or touching crowns." Include street trees in groves.
- Add "Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages."
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- SECTION 4. Add "The Director shall have the authority to allow replacement trees on both public and private property to meet the goals and objectives of race and social justice under Seattle's Equity and Environment Initiative."

- Under SMC 25.11.090 the Director has the authority to require “one or more trees” to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.
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Thank you for protecting our urban forest.

Louise Fox

[louise.s.fox@gmail.com](mailto:louise.s.fox@gmail.com)

4220 Ne 125th St

Seattle, Washington 98125-4636

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**From:** Scott Granlund <info@email.actionnetwork.org>  
**Sent:** Monday, August 17, 2020 10:38 AM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI’s Director’s Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Less is not more. I believe the general consensus is that on the whole we need more trees on this planet. Times are changing, the climate is changing, and some will suffer greatly because of this change. On the small local level we can make decisions that will be for the greater good. Keeping trees, building our number of trees are all aspects of positive growth. Of course a heavily diseased and otherwise rotten trees are another matter. In order to keep trees and not bow to development interests (\$\$) that have the opposite plan, we need laws.

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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city.”

- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as “a group of 3 or more significant trees with overlapping or touching crowns.” Include street trees in groves.
- Add “Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages.”
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certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

Scott Granlund

[sgranlund@gmail.com](mailto:sgranlund@gmail.com)

8612 Wabash Ave. S.

Seattle, Washington 98118

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**From:** Diana Gardiner <info@email.actionnetwork.org>  
**Sent:** Monday, August 17, 2020 10:47 AM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

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- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires

- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees

The following changes to the draft Director’s Rule are needed:

- Change Subject Title to remove words “land division” and replace with “Development”
- PURPOSE AND BACKGROUND. add “SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city.”
- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as “a group of 3 or more significant trees with overlapping or touching crowns.” Include street trees in groves.
- Add “Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages.”
- Add “All replacement trees regardless of size are protected trees and can’t be removed.”
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- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats

and need to be considered at the beginning of the development process. The language of this SEPA code section should be included in the Director's Rule to be certain that the code is complied with.

- SECTION 6. SDCI should adopt SDOT's registration process and requirements to assist Tree Care Providers in complying with city code and regulations. Reduce the number of citations that will remove a Tree Care Provider from being registered with the city to no more than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor's license to ensure they have workers' compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

Please act swiftly with no more delay, our Ballard trees come down every day with little to no repercussions.

Diana Gardiner

[diana.shurtlieff@gmail.com](mailto:diana.shurtlieff@gmail.com)

3023 NW 63rd St

Seattle, Washington 98107

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From: macintosh.chat@everyactioncustom.com <macintosh.chat@everyactioncustom.com>

Sent: Monday, August 17, 2020 10:55 AM

To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCI is no longer concerned about the fate of the smaller, non-exceptional trees.
- Protect red alders, black cottonwoods, and bitter cherries. These native trees provide important resources to birds and other wildlife and contribute to our sense of place in Seattle. Following the "right tree, right place" philosophy, these native trees can safely thrive and should be protected like other species.
- Expand the definition of tree groves to stands of six or more trees at least six inches in diameter, including street trees. Tree groves provide important habitat for birds and are becoming less common outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove.
- Require public notice postings on development site and online for removal of Exceptional trees, even when hazardous, to ensure community members know when and where legal tree removal is occurring.
- Require replacement for trees removed from groves and removed hazard trees.
- Align SDCI's proposed Tree Care Provider Acknowledgement with SDOT's Tree Service Provider Registration. Do not automatically renew this form annually. It should be updated each year. Reduce the number of infractions tree service providers can incur in a year before they are removed from the City's list to do business from more than three infractions to more than two infractions.
- Section 4: Preference for planting off-site replacement trees on public property is restrictive. The Director should be able to allow replacement trees not only on public property, but also on private property, where desired by the property owner, in order to meet the City's goals and objectives of race and social justice under Seattle's Equity and Environment Initiative.

The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,

Karen Larson Ph.D.

750 Belmont Ave E Apt 14 Seattle, WA 98102-5986 [macintosh.chat@gmail.com](mailto:macintosh.chat@gmail.com)

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**From:** William Wellborn <mwellborn@earthlink.net>

**Sent:** Monday, August 17, 2020 10:56 AM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Tree Protection!

**CAUTION: External Email**

Sandra Pinto de Bader,

One of the key factors that brought me to Seattle, and keeps me here, has been the tree cover. Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

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The following changes to the draft Director's Rule are needed:

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Thank you for protecting our urban forest.

William Wellborn

[mwellborn@earthlink.net](mailto:mwellborn@earthlink.net)

6535 21st Ave SW  
Seattle , Washington 98106

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**From:** Lisa Bellerio <info@email.actionnetwork.org>  
**Sent:** Monday, August 17, 2020 11:06 AM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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- SECTION 4. Add “The Director shall have the authority to allow replacement trees on both public and private property to meet the goals and objectives of race and social justice under Seattle’s Equity and Environment Initiative.”
- Under SMC 25.11.090 the Director has the authority to require “one or more trees” to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.
- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats and need to be considered at the beginning of the development process. The language of this SEPA code section should be included in the Director’s Rule to be certain that the code is complied with.
- SECTION 6. SDCI should adopt SDOT’s registration process and requirements to assist Tree Care Providers in complying with city code and regulations. Reduce the number of citations that will remove a Tree Care Provider from being registered with the city to no more

than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor's license to ensure they have workers' compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

Lisa Bellerio

[lisabellerio@gmail.com](mailto:lisabellerio@gmail.com)

2513 Perkins Lane West

Seattle , Puerto Rico 981@9

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**From:** Michele Leonard <savethetrees@live.com>  
**Sent:** Monday, August 17, 2020 11:20 AM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by to insome, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches

- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees

The following changes to the draft Director's Rule are needed:

- Change Subject Title to remove words "land division" and replace with "Development"
- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."
- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as "a group of 3 or more significant trees with overlapping or touching crowns." Include street trees in groves.
- Add "Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages."
- Add "All replacement trees regardless of size are protected trees and can't be removed."
- SECTION 2. Change the heading to "TREE PROTECTION". Remove references to "Exceptional Trees" only and change to "Trees". e.g., change "Exceptional Tree Protection Areas" to "Tree Protection Areas".
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the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.

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Simply put: Save trees with protective legislation NOW,. This has been "studied" for years,. The developers keep getting delays and the city keeps losing trees. What color do you want your sky...developer yellow or tree blue?

Thank you for protecting our urban forest.

Michele Leonard

[savethetrees@live.com](mailto:savethetrees@live.com)

13502 Ashworth Ave n

Seattle, Washington 98133

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**From:** Nancy Fasoldt <info@email.actionnetwork.org>

**Sent:** Monday, August 17, 2020 11:27 AM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

Nancy Fasoldt

[fasoldtgardens@gmail.com](mailto:fasoldtgardens@gmail.com)

345 NW 47th St  
Seattle, Washington 98107

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**From:** John Barber <barber-osa@comcast.net>  
**Sent:** Monday, August 17, 2020 11:37 AM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

John Barber

[barber-osa@comcast.net](mailto:barber-osa@comcast.net)

3421 East Superior Street

Seattle, Washington 98122-6557

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**From:** Victoria Nelson <[johnvick@comcast.net](mailto:johnvick@comcast.net)>

**Sent:** Monday, August 17, 2020 11:41 AM

**To:** Pinto de Bader, Sandra <[Sandra.Pinto\\_de\\_Bader@Seattle.gov](mailto:Sandra.Pinto_de_Bader@Seattle.gov)>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

Victoria Nelson

[johnvick@comcast.net](mailto:johnvick@comcast.net)

4502 SW Trenton St.

Seattle, Washington 98136

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From: Ejayanti12@everyactioncustom.com <Ejayanti12@everyactioncustom.com>  
Sent: Monday, August 17, 2020 11:52 AM  
To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCI is no longer concerned about the fate of the smaller, non-exceptional trees.
- Protect red alders, black cottonwoods, and bitter cherries. These native trees provide important resources to birds and other wildlife and contribute to our sense of place in Seattle. Following the "right tree, right place" philosophy, these native trees can safely thrive and should be protected like other species.
- Expand the definition of tree groves to stands of six or more trees at least six inches in diameter, including street trees. Tree groves provide important habitat for birds and are becoming less common outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove.
- Require public notice postings on development site and online for removal of Exceptional trees, even when hazardous, to ensure community members know when and where legal tree removal is occurring.
- Require replacement for trees removed from groves and removed hazard trees.
- Align SDCI's proposed Tree Care Provider Acknowledgement with SDOT's Tree Service Provider Registration. Do not automatically renew this form annually. It should be updated each year. Reduce the number of infractions tree service providers can incur in a year before they are removed from the City's list to do business from more than three infractions to more than two infractions.
- Section 4: Preference for planting off-site replacement trees on public property is restrictive. The Director should be able to allow replacement trees not only on public property, but also on private property, where desired by the property owner, in order to meet the City's goals and objectives of race and social justice under Seattle's Equity and Environment Initiative.

The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
Ella Stockman  
5026 SW Admiral Way Seattle, WA 98116-2315 [Ejayanti12@gmail.com](mailto:Ejayanti12@gmail.com)

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**From:** John Bito <jwb.dontclearcutseattle@ballardview.com>

**Sent:** Monday, August 17, 2020 11:55 AM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Seattle must move forward now to adopt an updated Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements, with the amendments proposed below. This protection for our trees was first proposed by the Seattle City Council 11 years ago and is long overdue.

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Thank you for protecting our urban forest.

John Bito

[jwb.dontclearcutseattle@ballardview.com](mailto:jwb.dontclearcutseattle@ballardview.com)

220 NW 58 St  
Seattle, Washington 98107

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From: kaichenhaun@everyactioncustom.com <kaichenhaun@everyactioncustom.com>  
Sent: Monday, August 17, 2020 11:56 AM  
To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

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Sincerely,

Kai Chenhaun

2236 Prescott Ave SW Seattle, WA 98126-2039 [kaichenhaun@gmail.com](mailto:kaichenhaun@gmail.com)

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**From:** John McNulty <info@email.actionnetwork.org>

**Sent:** Monday, August 17, 2020 11:59 AM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

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- Add "All replacement trees regardless of size are protected trees and can't be removed."
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- SECTION 4. Add "The Director shall have the authority to allow replacement trees on both public and private property to meet the goals and objectives of race and social justice under Seattle's Equity and Environment Initiative."
- Under SMC 25.11.090 the Director has the authority to require "one or more trees" to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.

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Thank you for protecting our urban forest.

John McNulty

[johnm4502@gmail.com](mailto:johnm4502@gmail.com)

4502 SW TRENTON

SEATTLE, Washington 98136

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**From:** Rachael Enderle <info@email.actionnetwork.org>  
**Sent:** Monday, August 17, 2020 12:08 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
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- Tightening tree removal requirements for exceptional trees as hazard trees

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- Change Subject Title to remove words "land division" and replace with "Development"
- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."
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Thank you for protecting our urban forest!

Rachael

Rachael Enderle

[r.kenney@gmail.com](mailto:r.kenney@gmail.com)

7721 31st Ave NE

Seattle, Washington 98115

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**From:** Catherine Endicott <[info@email.actionnetwork.org](mailto:info@email.actionnetwork.org)>

**Sent:** Monday, August 17, 2020 12:09 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

Catherine Endicott  
[cendicott2011@gmail.com](mailto:cendicott2011@gmail.com)  
2812 NW 85TH ST, UNIT a  
SEATTLE, Washington 98117

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**From:** Meredith Regal <info@email.actionnetwork.org>  
**Sent:** Monday, August 17, 2020 12:16 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

Meredith Regal

[regalmeredith@gmail.com](mailto:regalmeredith@gmail.com)

6118 21st Avenue Northeast

Seattle , Washington 98115

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**From:** Dixie Edwards <dixie@watershedgardenworks.com>

**Sent:** Monday, August 17, 2020 12:20 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Trees are natural air conditioners. We must protect large trees for all the benefits they offer. Larger trees make a more pleasant place to live. They add value to communities. Protect them.

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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Thank you for protecting our urban forest.

Dixie Edwards

[dixie@watershedgardenworks.com](mailto:dixie@watershedgardenworks.com)

2039 44th Ave.

Longview, Washington 98632

---

**From:** Susan Helf <info@email.actionnetwork.org>

**Sent:** Monday, August 17, 2020 12:21 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI’s Director’s Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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Thank you for protecting our urban forest.

Susan Helf

[shelf30@gmail.com](mailto:shelf30@gmail.com)

8501 12th Ave. NW, Unit 208  
Seattle, Washington 98117

---

**From:** David Moehring <dmoehring@consultant.com>  
**Sent:** Monday, August 17, 2020 12:22 PM  
**To:** PRC <PRC@seattle.gov>  
**Cc:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>; treepac\_seattlelists.riseup.net <treepac\_seattle@lists.riseup.net>; gigisteven@gmail.com; Whitworth, Allison <Allison.Whitworth@seattle.gov>; DOT\_LA <DOT\_LA@seattle.gov>; Pedersen, Alex <Alex.Pedersen@seattle.gov>; Strauss, Dan <Dan.Strauss@seattle.gov>; An, Noah <Noah.An@seattle.gov>; Thaler, Toby <Toby.Thaler@seattle.gov>  
**Subject:** Exceptional trees must be considered at 1011 NE 71ST ST with proposed rezone of 3034865-LU

**CAUTION: External Email**

Dear PRC,

Yes, up-zoning may be a good thing in certain areas ...  
and ignoring the dozen trees that will be removed is not such a good thing.

This proposal at **7012 Roosevelt Way NE** expands an existing NC2-55 lot to the adjacent property at 1007 NE 71st Street.

The Early Design Guidance (and ADR) excludes any evaluation of the dozen trees... most may be insignificant in nature. However, there is a vary large and likely Exceptional deciduous tree on the proposed eastern edge of the expanded zone. The tree originates on the property of 1011 NE 71st Street with a significant portion of it's critical root zone and canopy being assumed to be removed. Is there an arborist report for this east side of the proposed re-zone?

The problem is that LR zoning requires consideration of Seattle's Exceptional trees; and I do not believe consideration is required for NC zoning. It's just cut and infill... not many questions asked.

The Planner Allison Whitworth should consider the need for an arborist report to consider all tree groves and exceptional trees on the two-lot area, the street trees on NE 71st, and what efforts will be made relative to tree retention and the Seattle tree coverage goals.

Alarming is that the rezone for Neighborhood Commercial is **yielding no neighborhood commercial!** Instead the proposed ground floor has utilities and services along the street in contrast with neighborhood design guidelines for Roosevelt and Seattle. Some residential units are tucked away in the back with no street exposure along NE 71st... a residential street. The ground floor along the sidewalk should be commercial, with services in back, and residential units on the floors 2-5. If no neighborhood commercial, then a better rezone would be lowrise multifamily LR2 or LR3.

Everyone always mentions off-street parking... as they should. The Seattle Times reported that roughly 85%+ of resident households within this area and most of Seattle own at least one car. It seems below grade parking could be considered along with neighborhood commercial. The design report states, however, "Because of the location within a transit-rich area, no vehicle parking is proposed. The project intends to provide high quality housing in a well connected area, and further densify the mixed use corridor along Roosevelt Way NE."

I'm guessing that the profiled residents for this "high-quality housing" without parking might be rather limited.

This is being copied to the two councilpersons in this area and their associated staff.

Thank you,  
David Moehring  
TREETAC Board Member

Image attached: I have marked with orange color the rough location of 2 large trees relative to the proposal. The word "Preferred" is from the architect of the project...

I'm not sure if there cannot be more ground floor relief to set away from the Exceptional trees.



David Moehring  
312-965-0634

---

**From:** Charles Buitron <info@email.actionnetwork.org>

**Sent:** Monday, August 17, 2020 12:22 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

I'm in a neighborhood that is being cleared of all vegetation so multiple row houses are built. Many trees that offer so much to the neighborhood have been cut down. I know developers are pushing to delay and change these sensible proposals. They argue that they can't keep housing affordable with these proposals. That shows a total lack of imagination. There is one clear example of an architect offering his plans to develop a property with the same units and save a beautiful 50 yr old Tulip tree on the property. The developer refused to compromise. Now on this property and all multi family properties spring up boring skinny boxes that still sell for close to a million. Affordable???? This proposal needs to be implemented now. This is a compromise for agreeing to development in our neighborhoods. If this is not adopted expect a well organized uprising in the next election.

Charles B

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- SECTION 6. SDCI should adopt SDOT's registration process and requirements to assist Tree Care Providers in complying with city code and regulations. Reduce the number of citations that will remove a Tree Care Provider from being registered with the city to no more than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor's license to ensure they have workers' compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

Charles Buitron

[chasbuit@yahoo.com](mailto:chasbuit@yahoo.com)

723 N. 50 th St.

Seattle, Washington 98103-6035

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**From:** Shawna Macneale <info@email.actionnetwork.org>  
**Sent:** Monday, August 17, 2020 12:36 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please Strengthen Seattle's Tree Ordinance

**CAUTION: External Email**

Sandra Pinto de Bader,

Seattle's trees and urban forest are vital to keeping our city healthy and livable. Trees and the urban forest comprise a vital green infrastructure. Trees reduce air pollution, storm water runoff and climate impacts like heat island effects, while providing essential habitat for birds and other wildlife. They are important for the physical and mental health of our residents.

Seattle's rapid growth and an outdated tree ordinance are reducing these beneficial effects as trees are removed and not replaced. It is urgent to act now to stop this continued loss of trees, particularly large mature trees and tree groves. It is important to promote environmental equity as trees are replaced.

Please update Seattle's Tree Protection Ordinance as recommended in the latest draft by the Seattle Urban Forestry Commission.

Here are the key provisions that need to be in the updated tree ordinance:

1. Expand the existing Tree Removal and Replacement Permit Program, including 2-week public notice and posting on-site, as used by the Seattle Department of Transportation (SDOT) – to cover all Significant Trees (6" and larger diameter at breast height (DBH)) on private property in all land use zones, both during development and outside development.
2. Require the replacement of all Significant Trees removed with trees that in 25 years will reach equivalent canopy volume – either on site or pay a replacement fee into a City Tree Replacement and Preservation Fund. Allow the Fund to also accept fines, donations, grants and set up easements.
3. Retain current protections for Exceptional Trees and reduce the upper threshold for Exceptional Trees to 24" DBH, protect tree groves and prohibit Significant Trees being removed on undeveloped lots.
4. Allow removal of no more than 2 Significant non-Exceptional Trees in 3 years per lot outside development
5. Establish one citywide database for applying for Tree Removal and Replacement Permits and to track changes in the tree canopy.
6. Post online all permit requests and permit approvals for public viewing.
7. Expand SDOT's existing tree service provider's registration and certification to register all Tree Service Providers (arborists) working on trees in Seattle.
8. Provide adequate funding in the budget to implement and enforce the updated ordinance.

Shawna Macneale  
[shawnaum@gmail.com](mailto:shawnaum@gmail.com)  
2614 NE 90th St  
Seattle, Washington 98115

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**From:** Deb Barker <djb124@earthlink.net>  
**Sent:** Monday, August 17, 2020 12:37 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments as detailed below, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including maintenance obligations and tree service provider requirements.

Seattle must move forward NOW WITHOUT DELAY as urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per

SMC 25.11.090

- Tightening tree removal requirements for exceptional trees as hazard trees

The following changes to the draft Director's Rule are needed:

- Change Subject Title to remove words "land division" and replace with "Development"
- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."
- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as "a group of 3 or more significant trees with overlapping or touching crowns." Include street trees in groves.
- Add "Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages."
- Add "All replacement trees regardless of size are protected trees and can't be removed, and also add All replacement trees shall be maintained for a period of four (4) years so that they have a fighting chance to become established in a city that is tree deficient."
- SECTION 2. Change the heading to "TREE PROTECTION". Remove references to "Exceptional Trees" only and change to "Trees". e.g., change "Exceptional Tree Protection Areas" to "Tree Protection Areas".
- SECTION 4. Add "The Director shall have the authority to allow replacement trees on both public and private property to meet the goals and objectives of race and social justice under Seattle's Equity and Environment Initiative."
- Under SMC 25.11.090 the Director has the authority to require "one or more trees" to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise and or double as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.
- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats and need to be considered at the BEGINNING of the development process. The language of

this SEPA code section should be included in the Director's Rule to be certain that the code is complied with. DON' ASSUME that everyone will know or care about the language.

- SECTION 6. SDCI should adopt SDOT's registration process and requirements to assist Tree Care Providers in complying with city code and regulations. Reduce the number of citations that will remove a Tree Care Provider from being registered with the city to no more than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor's license to ensure they have workers' compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Again, there is NO GOOD REASON to delay this Directors Rule NOW. Please do it.

Thank you for protecting our urban forest.

Deb Barker

[djb124@earthlink.net](mailto:djb124@earthlink.net)

6043 48th Avenue SW

Seattle, Washington 98136

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**From:** David Dresser <info@email.actionnetwork.org>  
**Sent:** Monday, August 17, 2020 12:52 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Save our Trees!

**CAUTION: External Email**

Sandra Pinto de Bader,

Seattle's trees and urban forest are vital to keeping our city healthy and livable. Trees and the urban forest comprise a vital green infrastructure. Trees reduce air pollution, storm water

runoff and climate impacts like heat island effects, while providing essential habitat for birds and other wildlife. They are important for the physical and mental health of our residents.

Seattle's rapid growth and an outdated tree ordinance are reducing these beneficial effects as trees are removed and not replaced. It is urgent to act now to stop this continued loss of trees, particularly large mature trees and tree groves. It is important to promote environmental equity as trees are replaced.

Please update Seattle's Tree Protection Ordinance as recommended in the latest draft by the Seattle Urban Forestry Commission.

Here are the key provisions that need to be in the updated tree ordinance:

1. Expand the existing Tree Removal and Replacement Permit Program, including 2-week public notice and posting on-site, as used by the Seattle Department of Transportation (SDOT) – to cover all Significant Trees (6" and larger diameter at breast height (DBH)) on private property in all land use zones, both during development and outside development.
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5. Establish one citywide database for applying for Tree Removal and Replacement Permits and to track changes in the tree canopy.
6. Post online all permit requests and permit approvals for public viewing.
7. Expand SDOT's existing tree service provider's registration and certification to register all Tree Service Providers (arborists) working on trees in Seattle.
8. Provide adequate funding in the budget to implement and enforce the updated ordinance.

David Dresser

[david1936@hotmail.com](mailto:david1936@hotmail.com)

2526 NE 91ST ST  
SEATTLE, Washington 98115-3466

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**From:** Jonathan Pasley <info@email.actionnetwork.org>  
**Sent:** Monday, August 17, 2020 12:53 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements. This has been a long time coming -- the time to pass is now. There is no legit reason to delay.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
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- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees

The following changes to the draft Director's Rule are needed:

- Change Subject Title to remove words "land division" and replace with "Development"
- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."
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- Add "Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages."
- Add "All replacement trees regardless of size are protected trees and can't be removed."
- SECTION 2. Change the heading to "TREE PROTECTION". Remove references to "Exceptional Trees" only and change to "Trees". e.g., change "Exceptional Tree Protection Areas" to "Tree Protection Areas".
- SECTION 4. Add "The Director shall have the authority to allow replacement trees on both public and private property to meet the goals and objectives of race and social justice under Seattle's Equity and Environment Initiative."
- Under SMC 25.11.090 the Director has the authority to require "one or more trees" to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.
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- SECTION 6. SDCI should adopt SDOT's registration process and requirements to assist Tree Care Providers in complying with city code and regulations. Reduce the number of

citations that will remove a Tree Care Provider from being registered with the city to no more than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor's license to ensure they have workers' compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest! And improving the health of all of humanity in regards to climate change.

Jonathan Pasley

[mrconnecto@yahoo.com](mailto:mrconnecto@yahoo.com)

3916 NE 109th ST

Seattle, Washington 981257932

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**From:** Suzanne Grant <suzgrant206@gmail.com>

**Sent:** Monday, August 17, 2020 12:54 PM

**To:** SCI\_DRulesComments <SCI\_DRulesComments@seattle.gov>

**Cc:** Lewis, Andrew <Andrew.Lewis@seattle.gov>; Strauss, Dan <Dan.Strauss@seattle.gov>; Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>; Durkan, Jenny <Jenny.Durkan@seattle.gov>; Torgelson, Nathan <Nathan.Torgelson@seattle.gov>; David Moehring <dmoehring@consultant.com>; heidi calyxsite.com <heidi@calyxsite.com>; Steve Zemke <stevezemke@msn.com>; mkeeler <mkeeler@uw.edu>; Amalia Morsi <amalia.morsi@gmail.com>; Stuart Niven <panorarbor@gmail.com>; Joshua Morris, Seattle Audubon <joshm@seattleaudubon.org>

**Subject:** Draft Director's Rule 13-2020

**CAUTION: External Email**

Hello,

I believe the "new" Director's Rule does not solve the problem of tree removal in Seattle.

Here's the main problem: The new Rule states on p.2: "If both the City and the applicant determine that tree protection is not possible by using all mechanisms available to the applicant per titles 23 and 25, then the Rule provides for tree replacement requirements when *tree removal is allowed*."

Removal of Significant and Exceptional trees should NOT BE ALLOWED! Seattle just had the hottest day on record since the 1960's! Removal of healthy trees will exacerbate the worst effects of climate

change. Most of Seattle's urban trees are in single family zoning where most of the development and tree removal seems to be taking place.

Seattle Parks Arborist, Nick Johnson, and Kevin Bergsrud, Senior Planner @ Seattle Parks led an eye opening walk of dying trees on QA Boulevard last weekend. Diseases exacerbated by warmer, drier weather are killing our mature Birch, Maple, Oak and Chestnut trees. It is absolutely *unconscionable* that the City continues to take down *healthy* trees to reward a lack of creativity by the developer. More times than not, the development could take place *around* the trees! Due to yet another removal of a mature native Hemlock in the Greenlake neighborhood, Stuart Niven, ISA arborist, recently sent an email full of facts about the benefits of trees to SDCI. I hope you took time to read it. Mature Significant and Exceptional trees should NOT BE REMOVED! PERIOD.

Regarding Section 4, p.7: Tree Replacement. It is not exactly truthful to assume that "evergreens that are removed will be replaced by evergreens that achieve comparable size on public property." Where might this happen? And what Parks Employee will take care of it? We were told by Nick Johnson that *there are only 3 Parks employees responsible for watering ALL the Parks trees in Seattle!!* And a deciduous tree that is removed - same issue. The Exceptional Tulip Tree that was removed on QA hill in Dec 2019 will NOT be replaced by a tree species within the same size thresholds - and Hearing Examiner Vance allowed SDCI to cut it down per our hearing in July 2019.

Also: "The property owner of the site shall ensure that the trees planted remain healthy..." Who is going to enforce this policy? I have complained to SDCI per dead trees on new development near my house on QA hill and nothing has been done. Where is the budget for enforcement and maintenance of trees planted on private property? Another lie...

I hope you will follow the suggestions of the Urban Forestry Commission in their letter of July 1, 2020 to Nathan Torgelson. UFC has a comprehensive list of recommendations that I HOPE SDCI will consider and implement in their Director's Rule, including:

1. We need better data - To know if Seattle is gaining or losing tree canopy *area and volume*, SDCI must track the overall loss and gain not just of tree numbers but the size and canopy volume of trees.
2. Establish a separate Urban Forestry Division within SDCI to have a clear path for urban forestry issues decision-making or resolution and increased accountability. Alternatively, oversight authority for tree protection implementation could be assigned to the Office of Sustainability & Environment.

Thank you for listening and considering these suggestions.

Suzanne Grant  
2723 4th Ave W  
Seattle, WA 98119

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**From:** Melanie Davies <info@email.actionnetwork.org>

**Sent:** Monday, August 17, 2020 1:04 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees

The following changes to the draft Director's Rule are needed:

- Change Subject Title to remove words "land division" and replace with "Development"
- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."
- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as "a group of 3 or more significant trees with overlapping or touching crowns." Include street trees in groves.
- Add "Significant trees may become exceptional as they grow in size. They are future

replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages.”

- Add “All replacement trees regardless of size are protected trees and can’t be removed.”
- SECTION 2. Change the heading to “TREE PROTECTION”. Remove references to “Exceptional Trees” only and change to “Trees”. e.g., change “Exceptional Tree Protection Areas” to “Tree Protection Areas”.
- SECTION 4. Add “The Director shall have the authority to allow replacement trees on both public and private property to meet the goals and objectives of race and social justice under Seattle’s Equity and Environment Initiative.”
- Under SMC 25.11.090 the Director has the authority to require “one or more trees” to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.
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- SECTION 6. SDCI should adopt SDOT’s registration process and requirements to assist Tree Care Providers in complying with city code and regulations. Reduce the number of citations that will remove a Tree Care Provider from being registered with the city to no more than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor’s license to ensure they have workers’ compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

Melanie Davies

[melaniedavies81@gmail.com](mailto:melaniedavies81@gmail.com)

2130 North 90th Street  
Seattle, Washington 98103

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**From:** Julia Shettler <jhelen@uw.edu>  
**Sent:** Monday, August 17, 2020 1:07 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Hi,

My name is Julia and I have lived in Green Lake area my entire life. Living here, I've had the chance to see the huge boom in population in Seattle -- and with it, lots of development of multi-family homes, condos, and more.

Our city is beginning to look more and more like New York, San Francisco and Los Angeles in a bad way: it is turning in to a concrete jungle. Trees are needlessly chopped down by overseas developers and little consideration is given to our urban forest and environment.

It is indisputable that trees enhance quality of life, help the environment, and more. It is a false dichotomy that we must chop down trees to accommodate Seattle's population growth. This is a narrative pushed by developers to maximize their profits on buildings (after all, constructing buildings around trees is a little harder than just chopping them down).

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long

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Thank you for protecting our urban forest.

Julia Shettler

[jhelen@uw.edu](mailto:jhelen@uw.edu)

7419 Woodlawn Ave NE

Seattle, Washington 98115

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**From:** Barbara Goldoftas <bgoldoft@alum.mit.edu>  
**Sent:** Monday, August 17, 2020 1:07 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI’s Director’s Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

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maintain a diversity of tree species and ages.”

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- Under SMC 25.11.090 the Director has the authority to require “one or more trees” to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.
- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats and need to be considered at the beginning of the development process. The language of this SEPA code section should be included in the Director’s Rule to be certain that the code is complied with.
- SECTION 6. SDCI should adopt SDOT’s registration process and requirements to assist Tree Care Providers in complying with city code and regulations. Reduce the number of citations that will remove a Tree Care Provider from being registered with the city to no more than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor’s license to ensure they have workers’ compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

Barbara Goldoftas

[bgoldoft@alum.mit.edu](mailto:bgoldoft@alum.mit.edu)

16028 27th Ave NE  
Shoreline , Washington 98155

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**From:** Kathryn Neumann <info@email.actionnetwork.org>  
**Sent:** Monday, August 17, 2020 1:13 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees

The following changes to the draft Director's Rule are needed:

- Change Subject Title to remove words “land division” and replace with “Development”
- PURPOSE AND BACKGROUND. add “SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city.”
- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as “a group of 3 or more significant trees with overlapping or touching crowns.” Include street trees in groves.
- Add “Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages.”
- Add “All replacement trees regardless of size are protected trees and can’t be removed.”
- SECTION 2. Change the heading to “TREE PROTECTION”. Remove references to “Exceptional Trees” only and change to “Trees”. e.g., change “Exceptional Tree Protection Areas” to “Tree Protection Areas”.
- SECTION 4. Add “The Director shall have the authority to allow replacement trees on both public and private property to meet the goals and objectives of race and social justice under Seattle’s Equity and Environment Initiative.”
- Under SMC 25.11.090 the Director has the authority to require “one or more trees” to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.
- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats and need to be considered at the beginning of the development process. The language of this SEPA code section should be included in the Director’s Rule to be certain that the code is complied with.
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than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor's license to ensure they have workers' compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

Kathryn Neumann

[lushgardensseattle@gmail.com](mailto:lushgardensseattle@gmail.com)

7221 5th Ave NW

Seattle, Washington 98117

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**From:** Brent McFarlane <info@email.actionnetwork.org>

**Sent:** Monday, August 17, 2020 1:23 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt new Seattle Tree protections with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches

- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees

The following changes to the draft Director's Rule are needed:

- Change Subject Title to remove words "land division" and replace with "Development"
- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."
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- Under SMC 25.11.090 the Director has the authority to require "one or more trees" to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of

the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.

- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats and need to be considered at the beginning of the development process. The language of this SEPA code section should be included in the Director's Rule to be certain that the code is complied with.
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Thank you for protecting our urban forest.

Brent McFarlane

[mcfarmer@me.com](mailto:mcfarmer@me.com)

12248 Phinney Ave N

Seattle, Washington 98133

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**From:** Jeffrey West <info@email.actionnetwork.org>  
**Sent:** Monday, August 17, 2020 1:27 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adop SDCI's Director's Rule 13-2020 with listed modifications

**CAUTION: External Email**

Sandra Pinto de Bader,

I support the adoption, with amendments, SDCI's Director's Rule 13-2020 – Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move without the proposed delay in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are positive steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees

The following modifications to the draft Director's Rule are needed:

- Change Subject Title to remove words "land division" and replace with "Development"
- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."
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- Add "Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages."

- Add “All replacement trees regardless of size are protected trees and can’t be removed.”
- SECTION 2. Change the heading to “TREE PROTECTION”. Remove references to “Exceptional Trees” only and change to “Trees”. e.g., change “Exceptional Tree Protection Areas” to “Tree Protection Areas”.
- SECTION 4. Add “The Director shall have the authority to allow replacement trees on both public and private property to meet the goals and objectives of race and social justice under Seattle’s Equity and Environment Initiative.”
- Under SMC 25.11.090 the Director has the authority to require “one or more trees” to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.
- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats and need to be considered at the beginning of the development process. The language of this SEPA code section should be included in the Director’s Rule to be certain that the code is complied with.
- SECTION 6. SDCI should adopt SDOT’s registration process and requirements to assist Tree Care Providers in complying with city code and regulations. Reduce the number of citations that will remove a Tree Care Provider from being registered with the city to no more than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor’s license to ensure they have workers’ compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Jeffrey West

[jeffreykwest@gmail.com](mailto:jeffreykwest@gmail.com)

7333 Earl Ave NW

Seattle, Washington 98117

**From:** Emanuel Jacobowitz <info@email.actionnetwork.org>  
**Sent:** Monday, August 17, 2020 1:29 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** It's time to adopt SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

I write in support of SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements, with certain amendments for greater effect. I am a member of Plant for the Planet Seattle. Seattle's urban forest is one of the finest in the nation, providing shade, shelter, beauty, emotional health, and even food for our residents. But canopy is diminishing every year, and we will lose our "Emerald City" if we do not improve our regulations.

Seattle should not delay further. Increasing the protection for our tree canopy was first proposed by the Seattle City Council 11 years ago. These changes are long overdue.

The draft Director's Rule includes several important improvements:

- It allows protection of more trees--6 inches diameter at standard height and larger. the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designated "Exceptional" trees may grow to 30" diameter at standard height.
- Requiring Tree Care Providers to register with the City (SDOT requires this).
- When exceptional trees are removed for development, they must be replaced, without exception.
- Removing an exceptional tree as a "hazard tree" becomes less easy.

I agree with the Seattle Urban Forestry Commission that the draft rule does not go far enough and should be changed as follows:

- Change Subject Title to remove words "land division" and replace with "Development"
- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."
- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland,

Woodinville, and Duvall all define a tree grove as “a group of 3 or more significant trees with overlapping or touching crowns.” Include street trees in groves.

- Add “Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages.”
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- SECTION 2. Change the heading to “TREE PROTECTION”. Remove references to “Exceptional Trees” only and change to “Trees”. e.g., change “Exceptional Tree Protection Areas” to “Tree Protection Areas”.
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- Under SMC 25.11.090 the Director has the authority to require “one or more trees” to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.
- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats and need to be considered at the beginning of the development process. The language of this SEPA code section should be included in the Director’s Rule to be certain that the code is complied with.
- SECTION 6. SDCI should adopt SDOT’s registration process and requirements to assist Tree Care Providers in complying with city code and regulations. Reduce the number of citations that will remove a Tree Care Provider from being registered with the city to no more than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor’s license to ensure they have workers’ compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting the greenbelt.

Emanuel Jacobowitz

[mannyjac1@gmail.com](mailto:mannyjac1@gmail.com)

11518 25th Ave NE

Seattle, Washington 98125

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**From:** kevin orme <info@email.actionnetwork.org>

**Sent:** Monday, August 17, 2020 1:41 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Part 2

**CAUTION: External Email**

Sandra Pinto de Bader,

Besides my comments already submitted last night (sunday aug 16) as to the Director's Rule updates specifically, I would also refer you to these two articles on the important POLICY reasons for protecting trees in Seattle and urban areas generally - especially when we in the PNW are lucky enough to have more trees than most other places on earth already!?!?:

A Guide to Preserving Trees in Development Projects

- This publication explains tree health and environmental considerations and details how to preserve trees.-

<https://extension.psu.edu/a-guide-to-preserving-trees-in-development-projects>

Article: Trees help cities thrive: Here's why we need them more than ever

- As city populations soar, it might seem like there isn't much room for trees. But ecologists say these climatic powerhouses are an often overlooked solution to the health and environmental issues greater density brings.

<https://www.dw.com/en/trees-extreme-weather-heat-stress-water-drought-health-green-parks-cities-climate-change/a-54210247>

## Protecting Urban Forests

...City trees, of course, have enormous benefits beyond their physical beauty. They clean the air, cool the climate, control stormwater runoff, prevent soil erosion and lower energy costs. Studies show that they also reduce stress in city dwellers, lower crime, increase property values and reduce illness.

<https://www.americanforests.org/blog/protecting-urban-forests/>

kevin orme

[ovaltinelatte@hotmail.com](mailto:ovaltinelatte@hotmail.com)

502 N 80th

seattle, Washington 98103

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**From:** Kyle Hammond <info@email.actionnetwork.org>  
**Sent:** Monday, August 17, 2020 1:47 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

### CAUTION: External Email

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process

- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees

The following changes to the draft Director’s Rule are needed:

- Change Subject Title to remove words “land division” and replace with “Development”
- PURPOSE AND BACKGROUND. add “SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city.”
- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as “a group of 3 or more significant trees with overlapping or touching crowns.” Include street trees in groves.
- Add “Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages.”
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- SECTION 2. Change the heading to “TREE PROTECTION”. Remove references to “Exceptional Trees” only and change to “Trees”. e.g., change “Exceptional Tree Protection Areas” to “Tree Protection Areas”.
- SECTION 4. Add “The Director shall have the authority to allow replacement trees on both public and private property to meet the goals and objectives of race and social justice under Seattle’s Equity and Environment Initiative.”
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removed during development.

- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats and need to be considered at the beginning of the development process. The language of this SEPA code section should be included in the Director's Rule to be certain that the code is complied with.
- SECTION 6. SDCI should adopt SDOT's registration process and requirements to assist Tree Care Providers in complying with city code and regulations. Reduce the number of citations that will remove a Tree Care Provider from being registered with the city to no more than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor's license to ensure they have workers' compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

Kyle Hammond

[kylehammond2017@gmail.com](mailto:kylehammond2017@gmail.com)

5228 20th Ave NE

Seattle, Washington 98105

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**From:** Mike Ewanciw <info@email.actionnetwork.org>  
**Sent:** Monday, August 17, 2020 1:47 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division,

including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

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- SECTION 2. Change the heading to "TREE PROTECTION". Remove references to "Exceptional Trees" only and change to "Trees". e.g., change "Exceptional Tree Protection

Areas” to ”Tree Protection Areas”.

- SECTION 4. Add “The Director shall have the authority to allow replacement trees on both public and private property to meet the goals and objectives of race and social justice under Seattle’s Equity and Environment Initiative.”
- Under SMC 25.11.090 the Director has the authority to require “one or more trees” to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.
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Thank you for protecting our urban forest.

Mike Ewanciw

[mikewan@aol.com](mailto:mikewan@aol.com)

11325 Alton Ave. NE

Seattle, Washington 98125

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**From:** Dale Reite <dhale2000@comcast.net>

**Sent:** Monday, August 17, 2020 1:52 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

How can we delay these sensible guidelines with what we know about the benefits of urban trees. Developers will always make their money and only require more imagination to develop multi family units that will be more attractive to the buyer and the neighborhood with existing trees. Please pass this now. It's overdue by what I've seen in my neighborhood.

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

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The following changes to the draft Director's Rule are needed:

- Change Subject Title to remove words "land division" and replace with "Development"
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requirement continues throughout any subsequent development on all lots in all zones in the city.”

- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as “a group of 3 or more significant trees with overlapping or touching crowns.” Include street trees in groves.
- Add “Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages.”
- Add “All replacement trees regardless of size are protected trees and can’t be removed.”
- SECTION 2. Change the heading to “TREE PROTECTION”. Remove references to “Exceptional Trees” only and change to “Trees”. e.g., change “Exceptional Tree Protection Areas” to “Tree Protection Areas”.
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- Under SMC 25.11.090 the Director has the authority to require “one or more trees” to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.
- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats and need to be considered at the beginning of the development process. The language of this SEPA code section should be included in the Director’s Rule to be certain that the code is complied with.
- SECTION 6. SDCI should adopt SDOT’s registration process and requirements to assist Tree Care Providers in complying with city code and regulations. Reduce the number of citations that will remove a Tree Care Provider from being registered with the city to no more than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor’s license to ensure they have workers’ compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a

certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

Dale Reite

[dhale2000@comcast.net](mailto:dhale2000@comcast.net)

723 N. 50 th St.

Seattle, Washington 98103-6035

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**From:** Donna Sellers <info@email.actionnetwork.org>  
**Sent:** Monday, August 17, 2020 1:52 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires

- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees

The following changes to the draft Director’s Rule are needed:

- Change Subject Title to remove words “land division” and replace with “Development”
- PURPOSE AND BACKGROUND. add “SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city.”
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Thank you for protecting our urban forest.

Donna Sellers

[dlsellers2000@yahoo.com](mailto:dlsellers2000@yahoo.com)

7413 Woodlawn Ave NE

Seattle, Washington 98115

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**From:** Barry Pollack <info@email.actionnetwork.org>  
**Sent:** Monday, August 17, 2020 1:53 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Save Our Trees!

**CAUTION: External Email**

Sandra Pinto de Bader,

Seattle's trees and urban forest are vital to keeping our city healthy and livable. Trees and the urban forest comprise a vital green infrastructure. Trees reduce air pollution, storm water

runoff and climate impacts like heat island effects, while providing essential habitat for birds and other wildlife. They are important for the physical and mental health of our residents.

Seattle's rapid growth and an outdated tree ordinance are reducing these beneficial effects as trees are removed and not replaced. It is urgent to act now to stop this continued loss of trees, particularly large mature trees and tree groves. It is important to promote environmental equity as trees are replaced.

Please update Seattle's Tree Protection Ordinance as recommended in the latest draft by the Seattle Urban Forestry Commission.

Here are the key provisions that need to be in the updated tree ordinance:

1. Expand the existing Tree Removal and Replacement Permit Program, including 2-week public notice and posting on-site, as used by the Seattle Department of Transportation (SDOT) – to cover all Significant Trees (6" and larger diameter at breast height (DBH)) on private property in all land use zones, both during development and outside development.
2. Require the replacement of all Significant trees removed with trees that in 25 years will reach equivalent canopy volume – either on site or pay a replacement fee into a City Tree Replacement and Preservation Fund. Allow the Fund to also accept fines, donations, grants and set up easements.
3. Retain current protections for Exceptional Trees and reduce the upper threshold for Exceptional Trees to 24" DBH, protect tree groves and prohibit Significant Trees being removed on undeveloped lots.
4. Allow removal of no more than 2 Significant non-Exceptional Trees in 3 years per lot outside development
5. Establish one citywide database for applying for Tree Removal and Replacement Permits and to track changes in the tree canopy.
6. Post online all permit requests and permit approvals for public viewing.
7. Expand SDOT's existing tree service provider's registration and certification to register all Tree Service Providers (arborists) working on trees in Seattle.
8. Provide adequate funding in the budget to implement and enforce the updated ordinance.

Barry Pollack

[barrypollack@gmail.com](mailto:barrypollack@gmail.com)

2222 NE 92nd Street, #315  
Seattle, Washington 98115

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**From:** Rachel Pearson <rpse@comcast.net>  
**Sent:** Monday, August 17, 2020 1:56 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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Thank you for protecting our urban forest.

Rachel Pearson

[rpse@comcast.net](mailto:rpse@comcast.net)

5527 36th Ave NE

Seattle, Washington 98105

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**From:** Jennifer Mannheim <jennifer@Mannheim.us>  
**Sent:** Monday, August 17, 2020 2:03 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

Jennifer Mannheim

[jennifer@Mannheim.us](mailto:jennifer@Mannheim.us)

1203 NW 83rd St

Seattle, Washington 98117

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**From:** Elissa Favero <info@email.actionnetwork.org>

**Sent:** Monday, August 17, 2020 2:07 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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Thank you for protecting our urban forest, Elissa Favero

Elissa Favero

[05ecfster@gmail.com](mailto:05ecfster@gmail.com)

312 NE 42ND ST  
SEATTLE, Washington 98105

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**From:** Toni Cross <seasonco@comcast.net>  
**Sent:** Monday, August 17, 2020 2:09 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

Sincerely,

Toni Cross  
Certified Professional Horticulturist

Toni Cross  
[seasonco@comcast.net](mailto:seasonco@comcast.net)  
368 NW 47th Street  
SEATTLE, Washington 98107

---

**From:** Leslie Reed <info@email.actionnetwork.org>  
**Sent:** Monday, August 17, 2020 2:13 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

Leslie Reed

[lesizmor12@yahoo.com](mailto:lesizmor12@yahoo.com)

3646 39th Ave W

Seattle, Washington 98199

---

**From:** Katie Thien <info@email.actionnetwork.org>  
**Sent:** Monday, August 17, 2020 2:15 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please impose consequences on developers for clearing trees!

**CAUTION: External Email**

Sandra Pinto de Bader,

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- Change Subject Title to remove words "land division" and replace with "Development"
- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."
- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as "a group of 3 or more significant trees with overlapping or touching crowns." Include street trees in groves.
- Add "Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to

maintain a diversity of tree species and ages.”

- Add “All replacement trees regardless of size are protected trees and can’t be removed.”
- SECTION 2. Change the heading to “TREE PROTECTION”. Remove references to “Exceptional Trees” only and change to “Trees”. e.g., change “Exceptional Tree Protection Areas” to “Tree Protection Areas”.
- SECTION 4. Add “The Director shall have the authority to allow replacement trees on both public and private property to meet the goals and objectives of race and social justice under Seattle’s Equity and Environment Initiative.”
- Under SMC 25.11.090 the Director has the authority to require “one or more trees” to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.
- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats and need to be considered at the beginning of the development process. The language of this SEPA code section should be included in the Director’s Rule to be certain that the code is complied with.
- SECTION 6. SDCI should adopt SDOT’s registration process and requirements to assist Tree Care Providers in complying with city code and regulations. Reduce the number of citations that will remove a Tree Care Provider from being registered with the city to no more than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor’s license to ensure they have workers’ compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

Katie Thien

[katiethien2810@gmail.com](mailto:katiethien2810@gmail.com)

4750 21st Ave NE  
Seattle, Washington 98105

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**From:** Margaret Nims <margot888@comcast.net>  
**Sent:** Monday, August 17, 2020 2:30 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

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- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
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Thank you for protecting our urban forest.

Margaret Nims

[margot888@comcast.net](mailto:margot888@comcast.net)

2722 NE 87th Street

SEATTLE, Washington 98115

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From: [cuhrollin@everyactioncustom.com](mailto:cuhrollin@everyactioncustom.com) <[cuhrollin@everyactioncustom.com](mailto:cuhrollin@everyactioncustom.com)>  
Sent: Monday, August 17, 2020 2:37 PM  
To: Pinto de Bader, Sandra <[Sandra.Pinto\\_de\\_Bader@Seattle.gov](mailto:Sandra.Pinto_de_Bader@Seattle.gov)>  
Subject: In Regards to the Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a horticulture student, a child raised by an Urban Planner and a Landscape Architect, as well as a supporter of Seattle Audubon, protecting Seattle's urban forest is of utmost importance to me. Trees, especially mature specimens, provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city. We need to conserve and promote preservation of our mature trees which provide clean air, cooler temperatures, habitat, soil amelioration and so much more. The need for trees to remain and be preserved is more important on various scales than their removal. Their removal goes against the natural ecological processes and degrades soil integrity, water quality and promotes soil erosion.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees

greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCI is no longer concerned about the fate of the smaller, non-exceptional trees.

- Protect red alders, black cottonwoods, and bitter cherries. These native trees provide important resources to birds and other wildlife and contribute to our sense of place in Seattle. Following the "right tree, right place" philosophy, these native trees can safely thrive and should be protected like other species. Protecting our biodiversity has global impacts, as does destroying them.
- Expand the definition of tree groves to stands of six or more trees at least six inches in diameter, including street trees. Tree groves provide important habitat for birds and are becoming less common outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove.
- Require public notice postings on development site and online for removal of Exceptional trees, even when hazardous, to ensure community members know when and where legal tree removal is occurring.
- Require replacement for trees removed from groves and removed hazard trees.
- Align SDCI's proposed Tree Care Provider Acknowledgement with SDOT's Tree Service Provider Registration. Do not automatically renew this form annually. It should be updated each year. Reduce the number of infractions tree service providers can incur in a year before they are removed from the City's list to do business from more than three infractions to more than two infractions. This will help to ensure those with proper education about plant health and anatomy are performing the work. Section 4: Preference for planting off-site replacement trees on public property is restrictive. The Director should be able to allow replacement trees not only on public property, but also on private property, where desired by the property owner, in order to meet the City's goals and objectives of race and social justice under Seattle's Equity and Environment Initiative.

The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
Carolyn Rubenkonig  
8218 210th Pl SW Edmonds, WA 98026-7048 [cuhrollin@gmail.com](mailto:cuhrollin@gmail.com)

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**From:** Kaitlyn Lindsay <[info@email.actionnetwork.org](mailto:info@email.actionnetwork.org)>

**Sent:** Monday, August 17, 2020 3:03 PM

**To:** Pinto de Bader, Sandra <[Sandra.Pinto\\_de\\_Bader@Seattle.gov](mailto:Sandra.Pinto_de_Bader@Seattle.gov)>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

Kaitlyn Lindsay

[kaitie.e.lindsay22@gmail.com](mailto:kaitie.e.lindsay22@gmail.com)

9317 40th Ave NE  
Seattle , Alberta 98115

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**From:** Diane McCutcheon <info@email.actionnetwork.org>  
**Sent:** Monday, August 17, 2020 3:10 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Save Our Trees!

**CAUTION: External Email**

Sandra Pinto de Bader,

Seattle's trees and urban forest are vital to keeping our city healthy and livable. Trees and the urban forest comprise a vital green infrastructure. Trees reduce air pollution, storm water runoff and climate impacts like heat island effects, while providing essential habitat for birds and other wildlife. They are important for the physical and mental health of our residents.

Seattle's rapid growth and an outdated tree ordinance are reducing these beneficial effects as trees are removed and not replaced. It is urgent to act now to stop this continued loss of trees, particularly large mature trees and tree groves. It is important to promote environmental equity as trees are replaced.

Please update Seattle's Tree Protection Ordinance as recommended in the latest draft by the Seattle Urban Forestry Commission.

Here are the key provisions that need to be in the updated tree ordinance:

1. Expand the existing Tree Removal and Replacement Permit Program, including 2-week public notice and posting on-site, as used by the Seattle Department of Transportation (SDOT) – to cover all Significant Trees (6" and larger diameter at breast height (DBH)) on private property in all land use zones, both during development and outside development.
2. Require the replacement of all Significant trees removed with trees that in 25 years will reach equivalent canopy volume – either on site or pay a replacement fee into a City Tree Replacement and Preservation Fund. Allow the Fund to also accept fines, donations, grants

and set up easements.

3. Retain current protections for Exceptional Trees and reduce the upper threshold for Exceptional Trees to 24" DBH, protect tree groves and prohibit Significant Trees being removed on undeveloped lots.
4. Allow removal of no more than 2 Significant non-Exceptional Trees in 3 years per lot outside development
5. Establish one citywide database for applying for Tree Removal and Replacement Permits and to track changes in the tree canopy.
6. Post online all permit requests and permit approvals for public viewing.
7. Expand SDOT's existing tree service provider's registration and certification to register all Tree Service Providers (arborists) working on trees in Seattle.
8. Provide adequate funding in the budget to implement and enforce the updated ordinance. Lets not become a City that destroys our Beauty for the almighty dollar.

Diane McCutcheon

[243454duncan@gmail.com](mailto:243454duncan@gmail.com)

3130 NE 117th St, Known forever-  
Seattle, Washington 98125

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**From:** Kathleen Kerkof <info@email.actionnetwork.org>  
**Sent:** Monday, August 17, 2020 3:13 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

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With good planning, there is no reason we can't have both new housing and trees! Thinking that we always must sacrifice the environment in order to have progress is a continuation of the outdated, limited thinking that has created our current world of climate change, pollution, ecological collapse and extinction of species at an ever accelerating pace!. I would like to close with a quote from a Joni Mitchell song: " and don't it always seems to go that you don't know what you've got till it's gone!"

Thank you for protecting our urban forest

Kathleen Kerkof

[katkerkof@hotmail.com](mailto:katkerkof@hotmail.com)

2235 NW 64th St

Seattle, Washington 98107

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**From:** Andrea Lin <info@email.actionnetwork.org>  
**Sent:** Monday, August 17, 2020 3:15 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

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Andrea Lin

[asdf.lina@gmail.com](mailto:asdf.lina@gmail.com)

815 W Argand St

Seattle, Washington 98119

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**From:** Linda Berlage Metz <info@email.actionnetwork.org>  
**Sent:** Monday, August 17, 2020 3:40 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Dear SDCI,

I agree with the contents of this form letter. I am also adding a personal note.

I live in a 1909 Ballard house, and in my yard there stands an exceptional Black Walnut tree that is at least 80 years old.

Over the past 20 years I have witnessed Eagles, Crows, Robins, Scrub Jays, Chickadees, Flickers, Raccoons, Possums, Squirrels, and yes, Rats, use the tree for food, nests, rest, and play. It helps to cool my yard and house in the summer. In the Fall I collect the walnut husks to use for a clothing dye, and make a delicious Italian liqueur with the nuts!

My point is, these elder trees are beautiful, and serve so many purposes. They are irreplaceable. I am not against new development, but taking down healthy trees of all sizes for development needs to be reconsidered.

We need more, and better tree protections, now! Future Seattle residents will say we were wise if we take bold steps to protect our trees.

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- SECTION 6. SDCI should adopt SDOT’s registration process and requirements to assist Tree Care Providers in complying with city code and regulations. Reduce the number of citations that will remove a Tree Care Provider from being registered with the city to no more than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor’s license to ensure they have workers’ compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

Linda Berlage Metz  
Ballard

Linda Berlage Metz  
[ljbmetz@gmail.com](mailto:ljbmetz@gmail.com)

824 NW 54th Street  
Seattle, Washington 98107

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**From:** Ginny Allemann <vallemann@comcast.net>  
**Sent:** Monday, August 17, 2020 3:43 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees

The following changes to the draft Director's Rule are needed:

- Change Subject Title to remove words “land division” and replace with “Development”
- PURPOSE AND BACKGROUND. add “SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city.”
- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as “a group of 3 or more significant trees with overlapping or touching crowns.” Include street trees in groves.
- Add “Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages.”
- Add “All replacement trees regardless of size are protected trees and can’t be removed.”
- SECTION 2. Change the heading to “TREE PROTECTION”. Remove references to “Exceptional Trees” only and change to “Trees”. e.g., change “Exceptional Tree Protection Areas” to “Tree Protection Areas”.
- SECTION 4. Add “The Director shall have the authority to allow replacement trees on both public and private property to meet the goals and objectives of race and social justice under Seattle’s Equity and Environment Initiative.”
- Under SMC 25.11.090 the Director has the authority to require “one or more trees” to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.
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than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor's license to ensure they have workers' compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

Stop paving paradise! We need trees more than ever! And we need big ones! Come on Seattle! Don't bow (again) to developers!

Thank you.

Ginny Allemann

[vallemann@comcast.net](mailto:vallemann@comcast.net)

2344 Federal Ave. E.

Seattle, Washington 98102

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**From:** Irene Svete <info@email.actionnetwork.org>  
**Sent:** Monday, August 17, 2020 3:45 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

As a resident of Capitol Hill and a member of Seattle Audubon, I've been watching my neighborhood's tree canopy vanish year by year. It has to stop. Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated

Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

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The following changes to the draft Director's Rule are needed:

- Change Subject Title to remove words "land division" and replace with "Development"
- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."
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public and private property to meet the goals and objectives of race and social justice under Seattle's Equity and Environment Initiative."

- Under SMC 25.11.090 the Director has the authority to require "one or more trees" to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.
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Thank you for protecting our urban forest.

Irene Svete

[varina8@hotmail.com](mailto:varina8@hotmail.com)

308 E Republican St. Apt 803

Seattle , Washington 98102

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**From:** CHRISTINE ZIEMNIK <xnik@comcast.net>

**Sent:** Monday, August 17, 2020 3:55 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** trees

**CAUTION: External Email**

As a former Tree Steward who has, with groups, planted many trees on Beacon Hill, I fully support efforts to maintain and protect trees from falling victim to developers or homeowners whose interests are bottom lines and zero maintenance.

Thank you.

Christine Ziemnik

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**From:** nicole.gomez@gmail.com <info@email.actionnetwork.org>

**Sent:** Monday, August 17, 2020 4:22 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
  - Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
  - Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
  - Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
  - Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
  - Tightening tree removal requirements for exceptional trees as hazard trees
- The following changes to the draft Director's Rule are needed:
- Change Subject Title to remove words "land division" and replace with "Development"

- **PURPOSE AND BACKGROUND.** add “SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city.”
- **SECTION 1.** Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as “a group of 3 or more significant trees with overlapping or touching crowns.” Include street trees in groves.
- Add “Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages.”
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- **SECTION 2.** Change the heading to “TREE PROTECTION”. Remove references to “Exceptional Trees” only and change to “Trees”. e.g., change “Exceptional Tree Protection Areas” to “Tree Protection Areas”.
- **SECTION 4.** Add “The Director shall have the authority to allow replacement trees on both public and private property to meet the goals and objectives of race and social justice under Seattle’s Equity and Environment Initiative.”
- Under SMC 25.11.090 the Director has the authority to require “one or more trees” to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.
- **SECTION 5.** SEPA requirements under SMC 25.05.675 N are for protecting special habitats and need to be considered at the beginning of the development process. The language of this SEPA code section should be included in the Director’s Rule to be certain that the code is complied with.
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Require that Tree Care Provider companies have a WA State contractor's license to ensure they have workers' compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

[nicole.gomez@gmail.com](mailto:nicole.gomez@gmail.com)

343 NW 80th Street

Seattle, Washington 98117

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**From:** Atticus Bishop <info@email.actionnetwork.org>  
**Sent:** Monday, August 17, 2020 4:26 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

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- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees

The following changes to the draft Director’s Rule are needed:

- Change Subject Title to remove words “land division” and replace with “Development”
- PURPOSE AND BACKGROUND. add “SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city.”
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removed during development.

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Thank you for protecting our urban forest.

Atticus Bishop

[atticusbishop@mac.com](mailto:atticusbishop@mac.com)

18183 Normandy Terrace SW

Normandy Park, Washington 98166

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**From:** Emily O'Connor <eoconnor21@jesuitmail.org>

**Sent:** Monday, August 17, 2020 4:26 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020!! Protect Nature!

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division,

including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

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- Tightening tree removal requirements for exceptional trees as hazard trees

The following changes to the draft Director's Rule are needed:

- Change Subject Title to remove words "land division" and replace with "Development"
- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."
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- Add "All replacement trees regardless of size are protected trees and can't be removed."
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Areas” to ”Tree Protection Areas”.

- SECTION 4. Add “The Director shall have the authority to allow replacement trees on both public and private property to meet the goals and objectives of race and social justice under Seattle’s Equity and Environment Initiative.”
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Thank you for protecting our urban forest.

The city is prettier with trees!

Sincerely,

Emily O’Connor

Emily O’Connor

[eoconnor21@jesuitmail.org](mailto:eoconnor21@jesuitmail.org)

2075 NE Josephine dr.  
Hillsboro, Oregon 97124

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**From:** susannah white <susannahw@comcast.net>  
**Sent:** Monday, August 17, 2020 4:32 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please Update Seattle's Tree Ordinance

**CAUTION: External Email**

Sandra Pinto de Bader,

Seattle's trees and urban forest are vital to keeping our city healthy and livable. Trees and the urban forest comprise a vital green infrastructure. Trees reduce air pollution, storm water runoff and climate impacts like heat island effects, while providing essential habitat for birds and other wildlife. They are important for the physical and mental health of our residents.

Seattle's rapid growth and an outdated tree ordinance are reducing these beneficial effects as trees are removed and not replaced. It is urgent to act now to stop this continued loss of trees, particularly large mature trees and tree groves. It is important to promote environmental equity as trees are replaced.

Please update Seattle's Tree Protection Ordinance as recommended in the latest draft by the Seattle Urban Forestry Commission.

Here are the key provisions that need to be in the updated tree ordinance:

1. Expand the existing Tree Removal and Replacement Permit Program, including 2-week public notice and posting on-site, as used by the Seattle Department of Transportation (SDOT) – to cover all Significant Trees (6" and larger diameter at breast height (DBH)) on private property in all land use zones, both during development and outside development.
2. Require the replacement of all Significant Trees removed with trees that in 25 years will reach equivalent canopy volume – either on site or pay a replacement fee into a City Tree Replacement and Preservation Fund. Allow the Fund to also accept fines, donations, grants

and set up easements.

3. Retain current protections for Exceptional Trees and reduce the upper threshold for Exceptional Trees to 24" DBH, protect tree groves and prohibit Significant Trees being removed on undeveloped lots.
4. Allow removal of no more than 2 Significant non-Exceptional Trees in 3 years per lot outside development
5. Establish one citywide database for applying for Tree Removal and Replacement Permits and to track changes in the tree canopy.
6. Post online all permit requests and permit approvals for public viewing.
7. Expand SDOT's existing tree service provider's registration and certification to register all Tree Service Providers (arborists) working on trees in Seattle.
8. Provide adequate funding in the budget to implement and enforce the updated ordinance.

susannah white

[susannahw@comcast.net](mailto:susannahw@comcast.net)

3634 Bagley Ave North

SEATTLE, Washington 98103

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**From:** Meredith Radella <[mrاد15@comcast.net](mailto:mrاد15@comcast.net)>

**Sent:** Monday, August 17, 2020 4:35 PM

**To:** Pinto de Bader, Sandra <[Sandra.Pinto\\_de\\_Bader@Seattle.gov](mailto:Sandra.Pinto_de_Bader@Seattle.gov)>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long

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The following changes to the draft Director's Rule are needed:

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- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."
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Thank you for protecting our urban forest.

Meredith Radella

[mrاد15@comcast.net](mailto:mrاد15@comcast.net)

4808 3rd Ave NW

Seattle, Washington 98107

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**From:** Terry Tazioli <info@email.actionnetwork.org>  
**Sent:** Monday, August 17, 2020 4:44 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI’s Director’s Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

I'm certain you're received many of these. I hope a lot of these.

Time for dawdling on this is over. What is this city without its beauty, without its health, without its sanctuary for all of us? Our city's forests are our treasures. Don't bury them.

Thank you.

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees

The following changes to the draft Director's Rule are needed:

- Change Subject Title to remove words "land division" and replace with "Development"
- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."

- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as “a group of 3 or more significant trees with overlapping or touching crowns.” Include street trees in groves.
- Add “Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages.”
- Add “All replacement trees regardless of size are protected trees and can’t be removed.”
- SECTION 2. Change the heading to “TREE PROTECTION”. Remove references to “Exceptional Trees” only and change to “Trees”. e.g., change “Exceptional Tree Protection Areas” to “Tree Protection Areas”.
- SECTION 4. Add “The Director shall have the authority to allow replacement trees on both public and private property to meet the goals and objectives of race and social justice under Seattle’s Equity and Environment Initiative.”
- Under SMC 25.11.090 the Director has the authority to require “one or more trees” to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.
- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats and need to be considered at the beginning of the development process. The language of this SEPA code section should be included in the Director’s Rule to be certain that the code is complied with.
- SECTION 6. SDCI should adopt SDOT’s registration process and requirements to assist Tree Care Providers in complying with city code and regulations. Reduce the number of citations that will remove a Tree Care Provider from being registered with the city to no more than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor’s license to ensure they have workers’ compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a

certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

Terry Tazioli

[ttazioli@me.com](mailto:ttazioli@me.com)

8427 34th Ave. SW

Seattle, Washington 98126

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From: annbstevens50@everyactioncustom.com <annbstevens50@everyactioncustom.com>

Sent: Monday, August 17, 2020 4:46 PM

To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

For many years I have been tracking the neglect of tree protection in Seattle. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city. Cities around Seattle are doing a much better job of protecting trees.

Do not further delay improving the directors rule on tree protection. Many years have already passed without the administrative rules being strengthened and enforced.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big tree to 24 inches dbh, tightening removal of hazard trees, emphasizing tree retention during land division, registering arborists, and beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCI is no longer concerned about the fate of the smaller, non-exceptional trees.

- Protect red alders and bitter cherries. These native trees provide important resources to birds and other wildlife and contribute to our sense of place in Seattle. Following the "right tree, right place" philosophy, these native trees can safely thrive and should be protected like other species.
- Expand the definition of tree groves to stands of six or more trees at least six inches in diameter, including street trees. Tree groves provide important habitat for birds and are becoming less common outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove.
- Require public notice postings on development site and online for removal of Exceptional trees, even when hazardous, to ensure community members know when and where legal tree removal is occurring.
- Require replacement for trees removed from groves and removed hazard trees.

Require replacement trees to replace the canopy removed within 25 years.

Increase the fee paid to replace trees as the size of the trees removed increases

- Section 4: Preference for planting off-site replacement trees on public property is restrictive. The Director should be able to allow replacement trees not only on public property, but also on private property, where desired by the property owner, in order to meet the City's goals and objectives of race and social justice under Seattle's Equity and Environment Initiative.

The most important thing we can do for Seattle's urban forest is to protect the trees we already have!!! Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,

Ann Stevens

7014 21st Ave NE Seattle, WA 98115-5714 [annbstevens50@gmail.com](mailto:annbstevens50@gmail.com)

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**From:** Cynthia Slate <info@email.actionnetwork.org>

**Sent:** Monday, August 17, 2020 4:51 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Director's Rule 13-2020-not good enough

**CAUTION: External Email**

Sandra Pinto de Bader,

This rule doesn't grow canopy in neighborhoods, what it does is save current trees. There are less the 17% canopy in my neighborhood and all of our trees, except 8 of them are under 24 inches. We need to reforest our neighborhoods that don't have enough trees. How does this

grow our canopy to prevent asthma and other health issues? It doesn't. This protects wealthy neighborhoods that still have 30% canopy.

\*We need to require that if you have the space on a planting strip, you should plant a large tree. So many planting strips are just grass only even though they are 10 and 12 feet wide. Require trees be planted on these planting strips.

\* We need more native conifers -require that all native conifers are protected at 6 inches. 24 inches is too late, to save bird species.

\*This doesn't go far enough to give each neighborhood the canopy % we need to be healthy.

\*Please add stronger requirements to grow native trees.

SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees

The following changes to the draft Director's Rule are needed:

- Change Subject Title to remove words "land division" and replace with "Development"
- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and

larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city.”

- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as “a group of 3 or more significant trees with overlapping or touching crowns.” Include street trees in groves.
- Add “Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages.”
- Add “All replacement trees regardless of size are protected trees and can’t be removed.”
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- Under SMC 25.11.090 the Director has the authority to require “one or more trees” to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.
- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats and need to be considered at the beginning of the development process. The language of this SEPA code section should be included in the Director’s Rule to be certain that the code is complied with.
- SECTION 6. SDCI should adopt SDOT’s registration process and requirements to assist Tree Care Providers in complying with city code and regulations. Reduce the number of citations that will remove a Tree Care Provider from being registered with the city to no more

than 2 per year.

Thank you for protecting our urban forest.

Cynthia Slate

[cynthiaslate@gmail.com](mailto:cynthiaslate@gmail.com)

7743 12th ave NW

Seattle, Washington 98117

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**From:** William Gould Gould <willwrite@msn.com>

**Sent:** Monday, August 17, 2020 4:52 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

I urge you to stop delaying implementing this.

We can't wait any longer. Our inaction on this is a travesty and betrayal of trust to our children and future generations.

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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Transportation already requires

- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
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Thank you for protecting our urban forest.

William Gould Gould

[willwrite@msn.com](mailto:willwrite@msn.com)

3527 46th Ave NE

SEATTLE, Washington 98105-5324

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**From:** Janet Kimball <info@email.actionnetwork.org>  
**Sent:** Monday, August 17, 2020 5:05 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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Thank you for protecting our urban forest. Wedgwood is blessed with lovely, mature trees. With the heat today (Monday, August 17), they offer a respite and shade.

Janet Kimball

[hughandjanetkimball@yahoo.com](mailto:hughandjanetkimball@yahoo.com)

8051 28th AVE NE

SEATTLE, Washington 98115

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**From:** Rosemary Fisher <info@email.actionnetwork.org>

**Sent:** Monday, August 17, 2020 5:23 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Save our Trees!

**CAUTION: External Email**

Sandra Pinto de Bader,

Seattle's trees and urban forest are vital to keeping our city healthy and livable. Trees and the urban forest comprise a vital green infrastructure. Trees reduce air pollution, storm water runoff and climate impacts like heat island effects, while providing essential habitat for birds and other wildlife. They are important for the physical and mental health of our residents.

Seattle's rapid growth and an outdated tree ordinance are reducing these beneficial effects as trees are removed and not replaced. It is urgent to act now to stop this continued loss of trees, particularly large mature trees and tree groves. It is important to promote environmental equity as trees are replaced.

Please update Seattle's Tree Protection Ordinance as recommended in the latest draft by the Seattle Urban Forestry Commission.

Here are the key provisions that need to be in the updated tree ordinance:

1. Expand the existing Tree Removal and Replacement Permit Program, including 2-week public notice and posting on-site, as used by the Seattle Department of Transportation (SDOT) – to cover all Significant Trees (6" and larger diameter at breast height (DBH)) on private property in all land use zones, both during development and outside development.
2. Require the replacement of all Significant trees removed with trees that in 25 years will reach equivalent canopy volume – either on site or pay a replacement fee into a City Tree Replacement and Preservation Fund. Allow the Fund to also accept fines, donations, grants and set up easements.
3. Retain current protections for Exceptional Trees and reduce the upper threshold for Exceptional Trees to 24" DBH, protect tree groves and prohibit Significant Trees being removed on undeveloped lots.
4. Allow removal of no more than 2 Significant non-Exceptional Trees in 3 years per lot outside development
5. Establish one citywide database for applying for Tree Removal and Replacement Permits and to track changes in the tree canopy.

6. Post online all permit requests and permit approvals for public viewing.
7. Expand SDOT's existing tree service provider's registration and certification to register all Tree Service Providers (arborists) working on trees in Seattle.
8. Provide adequate funding in the budget to implement and enforce the updated ordinance.

Rosemary Fisher

[rosemr2001@yahoo.com](mailto:rosemr2001@yahoo.com)

7305 42nd Ave NE

Seattle, Washington 98115

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From: samanthamalay@everyactioncustom.com <samanthamalay@everyactioncustom.com>  
Sent: Monday, August 17, 2020 5:59 PM  
To: Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big trees, emphasizing tree retention during land division, registering arborists, and by beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

- Please accurately communicate the existing code's intent to maximize tree retention throughout the development process, not just during land division, and not just for Exceptional trees. For example, SMC 23.22 requires applicants during the platting process to indicate the species and location of all trees greater than 6" in diameter on the site to maximize their retention. This requirement makes no sense if after platting, SDCI is no longer concerned about the fate of the smaller, non-exceptional trees.
- Protect red alders, black cottonwoods, and bitter cherries. These native trees provide important resources to birds and other wildlife and contribute to our sense of place in Seattle. Following the "right tree, right place" philosophy, these native trees can safely thrive and should be protected like other species.

- Expand the definition of tree groves to stands of six or more trees at least six inches in diameter, including street trees. Tree groves provide important habitat for birds and are becoming less common outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove.
- Require public notice postings on development site and online for removal of Exceptional trees, even when hazardous, to ensure community members know when and where legal tree removal is occurring.
- Require replacement for trees removed from groves and removed hazard trees.
- Align SDCI's proposed Tree Care Provider Acknowledgement with SDOT's Tree Service Provider Registration. Do not automatically renew this form annually. It should be updated each year. Reduce the number of infractions tree service providers can incur in a year before they are removed from the City's list to do business from more than three infractions to more than two infractions.
- Section 4: Preference for planting off-site replacement trees on public property is restrictive. The Director should be able to allow replacement trees not only on public property, but also on private property, where desired by the property owner, in order to meet the City's goals and objectives of race and social justice under Seattle's Equity and Environment Initiative.

The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,  
Samantha Malay  
4507 A 15th Ave S Seattle, WA 98108-1819 [samanthamalay@yahoo.com](mailto:samanthamalay@yahoo.com)

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**From:** Stephen Shettler <info@email.actionnetwork.org>

**Sent:** Monday, August 17, 2020 6:40 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

I've been living in Seattle I was 4 and I'm now 18 heading into college at the UW. It's been hard seeing development come at the cost of trees when thoughtful planning could incorporate both density and an urban forest.

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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The following changes to the draft Director's Rule are needed:

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- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."
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- Add "Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages."
- Add "All replacement trees regardless of size are protected trees and can't be removed."

- SECTION 2. Change the heading to “TREE PROTECTION”. Remove references to “Exceptional Trees” only and change to “Trees”. e.g., change “Exceptional Tree Protection Areas” to “Tree Protection Areas”.
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Thank you for protecting our urban forest.

Stephen Shettler

[stephenshettler02@gmail.com](mailto:stephenshettler02@gmail.com)

7419 Woodlawn Ave NE

Seattle, Washington 98115

**From:** Nancy Barcus <nwbarcus@comcast.net>  
**Sent:** Monday, August 17, 2020 7:04 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

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- Tightening tree removal requirements for exceptional trees as hazard trees

The following changes to the draft Director's Rule are needed:

- Change Subject Title to remove words "land division" and replace with "Development"
- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."
- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland,

Woodinville, and Duvall all define a tree grove as “a group of 3 or more significant trees with overlapping or touching crowns.” Include street trees in groves.

- Add “Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages.”
- Add “All replacement trees regardless of size are protected trees and can’t be removed.”
- SECTION 2. Change the heading to “TREE PROTECTION”. Remove references to “Exceptional Trees” only and change to “Trees”. e.g., change “Exceptional Tree Protection Areas” to “Tree Protection Areas”.
- SECTION 4. Add “The Director shall have the authority to allow replacement trees on both public and private property to meet the goals and objectives of race and social justice under Seattle’s Equity and Environment Initiative.”
- Under SMC 25.11.090 the Director has the authority to require “one or more trees” to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.
- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats and need to be considered at the beginning of the development process. The language of this SEPA code section should be included in the Director’s Rule to be certain that the code is complied with.
- SECTION 6. SDCI should adopt SDOT’s registration process and requirements to assist Tree Care Providers in complying with city code and regulations. Reduce the number of citations that will remove a Tree Care Provider from being registered with the city to no more than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor’s license to ensure they have workers’ compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

Nancy Barcus

[nwbarcus@comcast.net](mailto:nwbarcus@comcast.net)

350 N 75th

Seattle, Washington 98103

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**From:** Olivia Mcapine <info@email.actionnetwork.org>  
**Sent:** Monday, August 17, 2020 7:20 PM  
**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>  
**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
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SMC 25.11.090

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Thank you for protecting our urban forest.

Olivia Mcapine

[oliviakmcalpine@gmail.com](mailto:oliviakmcalpine@gmail.com)

6534 49th ave ne

Seattle, Washington WA

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**From:** Margaret Cummings <peggyc@seanet.com>

**Sent:** Monday, August 17, 2020 8:09 PM

**To:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** Please adopt, with amendments, SDCI's Director's Rule 13-2020

**CAUTION: External Email**

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Thank you for protecting our urban forest.

Margaret Cummings

[peggyc@seanet.com](mailto:peggyc@seanet.com)

3116 SW Trenton

Seattle , Washington 98126

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**From:** peg <mpegrose@gmail.com>

**Sent:** Monday, August 17, 2020 8:18 PM

**To:** SCI\_DRulesComments <SCI\_DRulesComments@seattle.gov>

**Cc:** Pinto de Bader, Sandra <Sandra.Pinto\_de\_Bader@Seattle.gov>

**Subject:** SDCI Directors Rule 13-2020- SMC 25.11

**CAUTION: External Email**

I am writing in support of the proposed changes in the Directors Rule 13-2020 submitted by the UFC via a formal letter. Personally I have spent many years as a professional landscape architect frustrated by

Seattle's weak and confusing tree protection requirement. I volunteered on the Urban Forestry Commission for several years with the primary goal of new ordinance language. Thus these changes are very important to me.

I agree that the tree protection requirements need to be gathered in one location - linked or direct reference - it is too confusing currently.,

The one recommendation in the UFC letter I have a bit of a question about is the definition of tree - this is always tricky - as the professional definition does not accommodate our native Big leaf mapes, vine maples and river birch as they often do not have dominant leaders.

I encourage you to move with the UFC recommendations to the directors rule.

and... I just saw orcas!!!!

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*Peg Staeheli*  
206-854-1741

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