

Emails sent by Seattle residents regarding the tree protection ordinance through Saturday, August 15, 2020.

Please note that these emails are providing input to the Director's Rule 13-2020

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,

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,
Sue Jackson
1800 S Jackson St Seattle, WA 98144-2177 2020suejackson@gmail.com

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

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Sincerely,
 Rick H Hudson
 2727 NE 94th St Seattle, WA 98115-3476
rhudson@uw.edu

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.

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Sincerely,
Mark Dale

8251 Northrop Pl SW Seattle, WA 98136-2243 para_penguin@yahoo.com

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

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Sincerely,
Matt Sweet
745 Bellevue Ave E Seattle, WA 98102-4484 m@mattsw.com

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

2201 NE 120th St
Seattle, Washington 98125

From: anniethoe@everyactioncustom.com <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,

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Sincerely,
 Annie Thoe
 2201 NE 120th St Seattle, WA 98125-5254 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

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Sincerely,

Marie Braaksma

3225 W Government Way Seattle, WA 98199-1316 mjungmia@gmail.com

From: Imcginty206@everyactioncustom.com <Imcginty206@everyactioncustom.com>

Sent: Friday, August 14, 2020 6:09 AM

To: Pinto de Bader, Sandra <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.

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Sincerely,
Lisa McGinty
3848 47th Ave SW Seattle, WA 98116-3730 lmcginty206@gmail.com

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,

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Sincerely,
Karen Keeley
415 W Fulton St Seattle, WA 98119-2354
keeley.godbout@comcast.net

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

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Sincerely,
 Emily Cordova
 3032 NW 61st St Seattle, WA 98107-2559
emcord@gmail.com

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

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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.

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

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> 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?>

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.

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--->

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

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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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,
Cathy Sarkowsky
304 W Highland Dr Seattle, WA 98119-3547 cathysark@mac.com

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

2201 NE 120th St

Seattle, Washington 98125

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.

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.

Bonnie Miller

bmiller@serv.net

900 University Street, Apt 15BC

Seattle, Washington 98101-1730

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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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.

Karen Costarella

kpcostarella@gmail.com

2220 NE 130th St

Seattle, Washington 98125

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

CAUTION: External Email

Sandra Pinto de Bader,

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Thank you for protecting our urban forest. PLEASE SAVE SEATTLE TREES!

Judith Leconte

tbacgster@gmail.com

P O Box 15505

Seattle, Washington 98115

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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- 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.

Moani Russell
moanirussell@gmail.com
7526 39th Ave NE
Seattle, Washington 98115

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

2568 10th Ave W

Seattle, Washington 98119

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,

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.

CLAYTON SMITH

claytn8@gmail.com

4328 South Holden Street,
SEATTLE, Washington 98118

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

13034 1st Ave NE

Seattle, Washington 98125

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

4310 Sunnyside Avenue North
Seattle, Washington 98103

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

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Thank you for protecting our urban forest.

Anita Shelton

anitamshel@gmail.com

729 N 77th St

Seattle, Washington 98103

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

1215 NW 83rd Street

Seattle, Washington 98117

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

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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.

Barbara Gregory

barbara_gregory@yahoo.com

3538 Northeast 86th Street

Seattle, Washington 98115

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:

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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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- 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."
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Thank you for protecting our urban forest.

Carolyn Rodenberg
carolynrodenberg@mindspring.com
2121 8th Ave West
Seattle, Washington 98119-2240

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

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Thank you for protecting our urban forest.

Arianne Misener

almisener@hotmail.com

7717 Aurora Avenue north

Seattle, Washington 98103

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

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

2220 NE 130th Street

Seattle, Washington 98125

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
8737 29th Ave NW
Seattle, Washington 98117

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

11351 20th Ave NE

Seattle, Washington 98125

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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Thank you for protecting our urban forest.

Muriel Lawty

m.g.lawty@gmail.com

3018 NE 137TH ST, APT 3

SEATTLE, Washington 98125

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
Seattle Green Spaces Coalition. / [SGSC](#)

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."
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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 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:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
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Martin Westerman
artartart@seanet.com
9361 47th Ave. S.W.
Seattle, Washington 98136

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 40th AVE NE and 6850 39th 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 40th 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](http://Seattle.DepartmentofConstructionandInspections)
O: 206-684-5839 | 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>

Sent: Monday, July 27, 2020 4:57 PM

To: Pedersen, Alex <Alex.Pedersen@seattle.gov>; LEG_CouncilMembers <council@seattle.gov>; Torgelson, Nathan <Nathan.Torgelson@seattle.gov>; Emery, Chanda <Chanda.Emery@Seattle.gov>; Durkan, Jenny <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>; DOT_SeattleTrees <Seattle.Trees@seattle.gov>; Pederson, Art <Art.Pederson@seattle.gov>; McGarry, Deborah <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 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:

- 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.

Susan Seniuk

straw2gold@yahoo.com

11327 20th Avenue NE

Seattle, Washington 98125

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.

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Thank you for protecting our urban forest.

Sincerely, Lisa Westgard

Lisa Westgard

kailine94@hotmail.com

240 S. 198th St

Des Moines, WA, Washington 98148

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

CAUTION: External Email

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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. 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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Mary Ann Gwinn

Mary Gwinn
mgwinn@bookcritics.org
7814 39th Ave. S.W., Seattle
Seattle, Washington 98136

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

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Charna Klein

charnaklein@msn.com

6521 36 Ace NE

Seattle , Washington 98115

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, 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 Roda
1130 N 82nd St Seattle, WA 98103-4460
a.roda@comcast.net

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.”

- 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.

Joni Vanderburg

joni.vanderburg@gmail.com

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

6212 Crow Ln

Austin, Texas 78745

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.

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Thank you for protecting our urban forest.

andrea Faste

amfaste@comcast.net

7713 11th Av NW

Seattle, Washington 98117

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,

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Thank you for protecting our urban forest.

Patricia Ann

purpletea711@yahoo.com

800 Jefferson Street

Seattle , Washington 98104

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

7419 Woodlawn Ave NE

Seattle, Washington 98115

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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Thank you for protecting our urban forest.

Sincerely,

Sonia Lyris

Sonia Lyris

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

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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.

Jo Iacifano

Jojo@jojo-graphics.com

6560 159th Ave NE

Redmond , Washington 98052

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,

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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- 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.

Corrie Watterson

corrie.watterson@gmail.com

3519 E SPRUCE ST

Seattle, Washington 98122

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
8835 Burke Ave N
Seattle , Washington 98103

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

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

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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Meredith Foster

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

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Debbi Pratt

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

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Kimberly Fulton
kjfulton@gmail.com
4517 Renton Ave S
Seattle, Washington 98108

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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SMC 25.11.090

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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.

Scott Mahood

scottmahood@hotmail.com

3530 se hawthorne blvd

portland, Oregon 97214

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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Thank you for protecting our urban forest.

Bonnie Bledsoe

bonnielynnseattle@gmail.com

11010 28th Ave NE
Seattle, Washington 98125

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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Thank you for protecting our urban forest.

Victoria King

vkbirder@gmail.com

7326 55th Ave NE

Seattle, Washington 98115

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

CAUTION: External Email

Sandra Pinto de Bader,

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Barbara Fristoe

bfristoe@mac.com

3418 16th Ave S

Seattle , Washington 98144

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

CAUTION: External Email

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Thomas Everill

thomasjeverill@gmail.com

8051 Dibble Avenue NW

Seattle, Washington 98117

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

CAUTION: External Email

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John Vance

johnvance@gmail.com

3438 23rd Ave W

Seattle, Washington 98199

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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Lori Bellamy

lori@loribellamy.com

12th Ave NW

Seattle, Washington 98117

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

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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.

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

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

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”

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Thank you for protecting our urban forest.

Derek Benedict

dsbened@frontier.com

709 212th PL SW

Lynnwood, Washington 98036

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

9515 40TH AVE NE
SEATTLE, Washington 98115

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,

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Thank you for protecting our urban forest.

Sherry Narens

snarens@yahoo.com

PO Box 99274

Seattle, Washington 98139

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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Areas” to ”Tree Protection Areas”.

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Thank you for protecting our urban forest.

Christina Masters

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

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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Deanna Calef

deanna.lynnapleycalef@gmail.com

10345 Meridian Ave. N.

Seattle, Washington 98133

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,

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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.

Christopher Buckley
christopher_buckley@alumni.stanford.edu
6568 32 32nd Avenue NE
Seattle , Washington 98115-7247

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.

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."

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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

7903 8th Ave S

Seattle, Washington 98108

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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- Tightening tree removal requirements for exceptional trees as hazard trees

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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.

Robin Maynard-Dobbs
rock.robin@comcast.net
322 NW 103rd St
Seattle, Washington 98177

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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- 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.

Joan Moritz

jzmoritz@gmail.com

5810 Cowen Place NE Apt 103
Seattle, Washington 98105

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.

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,

Janice Bragg

6235 NE Princeton Way Seattle, WA 98115-7731 jbragg50@comcast.net

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

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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- 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.

Tom Foolery

lazytf@gmail.com

7420 Woodlawn Ave. NE

Seattle, Washington 98115

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 35th Ave NE, Seattle, WA 98115

(206) 523-8243 ext. 112 (work)

(831) 428-6274 (mobile)

joshm@seattleaudubon.org

www.seattleaudubon.org

SEATTLE AUDUBON
FOR BIRDS AND NATURE





August 14, 2020

Public Comments
Department of Construction and Inspections
700 5th Ave, #2000
Seattle, WA 98104
via email to 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 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. **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 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 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 sp.</i> <i>(geyeriana var. meleina, eriocephala ssp.</i> <i>mackenzieana, hookeriana, piperi, scouleriana,</i> <i>sitchensis)*</i>	8"
--	----

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.

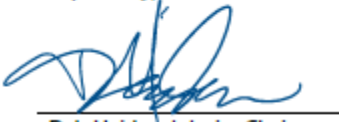
Dept. of Construction and Inspections
RE: DR 13-2020
August 14, 2020
Pg. 8 of 8

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 35th Ave NE, Seattle, WA 98115 / (206) 523-4483 / www.seattleaudubon.org

From: Heather Pihl <info@email.actionnetwork.org>
Sent: Friday, August 14, 2020 7:31 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.

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

124 Warren Ave N.

Seattle, Washington 98109

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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per SMC 25.11.090

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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.

Diedra Roesijadi

diedra@live.com

520 N 77th Street

Seattle, Washington 98103

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

1821 27th Ave

Seattle, Washington 98122

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.

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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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
7103 39th Ave SW
Seattle, Washington 98136-1909

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

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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.

Julie Weisbach

jmweisbach@comcast.net

2241 B Fairview AV E

Seattle, Washington 98102

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.

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.

PLEASE! Kind Regards and Stay Well, Rachel E. LaRoche

Rachel LaRoche
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,

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:

- Change Subject Title to remove words "land division" and replace with "Development"
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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.
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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
NE 92nd Street
Seattle, Washington 98115

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, 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. 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,

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:

- 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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Thank you for protecting our urban forest.

Susan Picquelle

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

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

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removed.”

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Thank you for protecting our urban forest.

Jan Napolitano

ulalume58@gmail.com

2340 48th ave sw apt 1

Seattle , Washington 98116

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,

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.

Nancy Peacock

nbpeacock@gmail.com

2504 NE 117th St

Seattle, Washington 98125-5304

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, 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.
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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. 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

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:

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The following changes to the draft Director's Rule are needed:

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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.

Nancy Shimeall
nshimeall@gmail.com
1525 nw 57th St NW
Seattle, Washington 98107

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,

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.

THOMAS DAVIES

Tomdavies44@gmail.com

3017 NE 90th St

Seattle, Washington 98115-3533

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,

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Thank you for protecting our urban forest.

Catherine Berchok

cberchok@yahoo.com

10040 36th Ave NE

Seattle, Washington 98125

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

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

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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Thank you for protecting our urban forest.

VICKI MORGANSTEVENSON

vickimorgan01@yahoo.com

2412 2ND AVE W
SEATTLE, Washington 98119

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

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Thank you for protecting our urban forest.

Mark Banks

Mark Banks

markbanks@me.com

26201 NE 40th St

Redmond, Washington 98053

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

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Jourdan Keith

jourdankeith@yahoo.com

1744 S Hanford St

Seattle, Washington 98144

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.

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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- 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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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.

Carol Long

carollgetalong@aol.com

3059 38th Ave SW

Seattle, Washington 98126

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 co2, 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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Thank you for protecting our urban forest.

Sonia Popadycz

ofromage@gmail.com

7412B Latona Ave NE

Seattle, Washington 98115

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

12248 Phinney Ave N
Seattle, Washington 98133

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,

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Thank you for protecting our urban forest.

Sincerely, Susan Montacute
4325 Jill PI S, Seattle 98108

Susan Montacute
montacutesm@gmail.com
4325 Jill PI S
Seattle, Washington 98108

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

11512 28th ave NE

Seattle, Washington 98125

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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Melody Winkle

mwinkle@gmail.com

2518 NE 92nd St

Seattle, Washington 98115

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,

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Thank you for protecting our urban forest.

Marianna Clark

Marianna Clark

mclarksea@yahoo.com

2116 2nd Ave West
Seattle, Washington 98119

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

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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.

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

2324 N 56 St

Seattle, Washington 98103

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

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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”.
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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.

Celine Pardo

celine_pardo@hotmail.com

5705 Phinney Ave N

Seattle, Washington 98103

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,

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

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Thank you for protecting our urban forest.

Marie Anna White

Marie White

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,

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Thank you for protecting our urban forest.

Karla Agapay

agapay.karla@yahoo.com

616 4th Ave W , Unit 102

Seattle, Washington 98119

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,

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Thank you for protecting our urban forest.

Eileen Heideman
ehaideman@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/TreeRegsResearchProjectPhaseIIFinalReport033117.pdf>

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Thank you for protecting our urban forest!

David Moehring

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

Sandra Pinto de Bader,

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Kelly Johnson

soundkj@hotmail.com

8903 20th Ave NE

Seattle , Washington 98115

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

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Paige Heggie

paigeheggie@hotmail.com

4207 Phinney Avenue North, Apt 205

Seattle, Washington 98103

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,

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Thank you for protecting our urban forest.

Lisa Branz

brali7@aol.com

4610 34th Ave w

Seattle, Kasai-Occidental Province 98199

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,

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
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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.

Jennifer Nelson

JennNel@comcast.net

12216 North Park Ave N
Seattle, Washington 98133-8027

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

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Thank you for protecting our urban forest.

Rebecca Watson

rebecca.watson@gmail.com

3932 SW Elmgrove

Seattle , Washington 98136

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
jjshisaka@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

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Stephen Tan

stan@cascadialaw.com

2442 5th Ave. West

Seattle, Washington 98119

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

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

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Christopher Dawe

dawecj@gmail.com

764 n 75th street

Seattle, Washington 98103

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

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BJ Patch

bjpatch@hotmail.com

526 1st Ave So 520

Seattle , Washington 98104

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

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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.

Audrey Meade

audreebee@gmail.com

4126 42nd Ave S

Seattle, Washington 98118

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
- 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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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

1416. E. Aloha St.

Seattle, Washington 98112

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,

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Thank you for protecting our urban forest.

Rebecca Reid

beckruthreid@gmail.com

12763 39th Ave. NE

Seattle, Washington 98125

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

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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- 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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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

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.

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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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.

Annette Ramsay

Ramclan01@gmail.com

11555 6th PL NE

Seattle, Washington 98125

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.
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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

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.

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Thank you for protecting our urban forest.

Colleen Weinstein

colleen@dyggin.com

4112 ne 103rd pl

Seattle , Washington 98125

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,

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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.

Karin de Weille

deweille@gm.slc.edu

7750 38th Ave NE

Seattle, Washington 98115

From: Cassandra 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:

- 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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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.

Kassandra Strople

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.

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Thank you for protecting our urban forest.

Suzette Crockett

suzettecrockett@gmail.com

717 Gladstone St..

Bellingha3, Washington 98225

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,

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.

Bryant Durrell

durrell@innocence.com

806A NW 49th St.

Seattle, Washington 98107

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,

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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SMC 25.11.090

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Thank you for protecting our urban forest.

Amelia Baggett

Ameliapowell@gmail.com

3811 23rd Ave W

Seattle, Washington 98199

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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Thank you for protecting our urban forest.

Amy Vandergon

amyvandergon@gmail.com

1027 Summit Ave E
Seattle, Washington 98102

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,

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Thank you for protecting our urban forest.

Debra Lochner Doyle

doylegnd@aol.com

2802 30th Ave W

Seattle, Washington 98199-2714

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,

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Thank you for protecting our urban forest.

Colin Wright

COLINMSN@MSN.COM

1402 N. 135th Place

Seattle, Washington 98133

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,

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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."
- 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.

Lauren Tucker

ltucker117@comcast.net

3614 SW Trenton St

Seattle, Washington 98126

From: Robert Blumenthal <rblument@comcast.net>
Sent: Saturday, August 15, 2020 9:34 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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Thank you for protecting our urban forest.

Robert Blumenthal

rblument@comcast.net

2812 NE 62nd St.

Seattle, Washington 98115

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

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

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,

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.

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
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 overdue.

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Thank you for protecting our urban forest.

Bernie Bowers

bernieb3@comcast.net

7553 Earl Avenue Northwest

Seattle, Washington 98117

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,

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Thank you for protecting our urban forest.

Diana Blackham

dianablackham@comcast.net

2511 W Fulton St

Seattle, Washington 98199

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,

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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.

Lucy Bowers-Wildblood

mz.beatdizzy@gmail.com

1425 Broadway #20090

Seattle, Washington 98122

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:

- 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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Thank you for protecting our urban forest.

Paul Gates

pjmgates@gmail.com

5250 35th Avenue Northeast

Seattle, Washington 98105

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

1000 Queen Anne Ave N., Apt 103.

Seattle, Washington 98109-3641

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
- 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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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.

Catherine Englehart
cathy@cathyenglehart.com
5029 Roosevelt Way NE
Seattle, Washington 98105

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.

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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 - Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
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- Change Subject Title to remove words “land division” and replace with “Development”
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Thank you for protecting our urban forest.

mindie lee

mindimudd@comcast.net

7412 east green lake drive, unit A

Seattle, Washington 98115

From: Rob Zisette <rzisette@herrerainc.com>

Sent: Saturday, August 15, 2020 11:46 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,

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.

Our urban forest is very important to me and everyone I know. Thanks for protecting it.

Rob Zisette

rzisette@herrerainc.com

3519 Burke Ave N

Seattle, Washington 98103

From: Barbara O'Steen <info@email.actionnetwork.org>

Sent: Saturday, August 15, 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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- 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.

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

4364 SW Cloverdale St.

Seattle, Washington 988136

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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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.

Ginger Goldman

gingergold@comcast.net

3801 Chilberg Pl sw

Seattle , Washington 98116

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,

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Thank you for protecting our urban forest.

Sharon LeVine

sweetumsseattle@yahoo.com

2819 4th Ave West

Seattle, Washington 98119-2338

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

CAUTION: External Email

Sandra Pinto de Bader,

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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:

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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.

Ramona Gault

sheepspinner@gmail.com

1305 N 167th St.

Shoreline, Washington 98133

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.

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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Thank you for protecting our urban forest.

Kristin Tregillus

ktregillus@comcast.net

2722 31st Ave. S.

Seattle, Washington 98144

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,

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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. These rules are reasonable guidelines for developers to work around.

Don Syverson
Architect (retired)

Don Syverson
dsy.ans@gmail.com
4707 35th Ave NE
Seattle, Washington 98105

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

1723 W Followthru Dr

Tampa, Florida 33612

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

4917 2nd Ave NW

Seattle, Washington 98107

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,

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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- Designating trees 10 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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Thank you for protecting our urban forest.

gabe shulman

gabeshulman@hotmail.com

3318 19th Ave S

Seattle, Washington 98144

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,

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Thank you for protecting our urban forest.

Erin Branigan

braniganerin@yahoo.com

1900 NE 105TH ST
SEATTLE, Washington 98125

From: debrathe1too@everyactioncustom.com <debrathe1too@everyactioncustom.com>
Sent: Saturday, August 15, 2020 2:09 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,
Deb Dur

3301 Beacon Ave S Apt 10 Seattle, WA 98144-6358 debrathe1too@hotmail.com

From: Catherine Ruha <info@email.actionnetwork.org>

Sent: Saturday, August 15, 2020 2:20 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

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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.

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

1541 NE 91st Street

Seattle, Washington 98115

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

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.

A beautiful city cannot claim to be so unless it has a substantial canopy of trees. Vincent DeLuca

Vincent DeLuca

vince.deluca13@comcast.net

3715 sw Hanford st

Seattle , Washington 98126

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

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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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.

Richard Huey

huey.rick@gmail.com

1710 Bradner PI S

Seattle, Washington 98144

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

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.

tnight@pobox.com

3617 23rd Ave W

Seattle, Washington 98199

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 in 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

Tom Hundley
hundleythomasr@gmail.com
5564 29th Ave NE
Seattle, Washington 98105

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.

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Thank you for protecting our urban forest.

Summer Montacute

summermontacute@gmail.com

4325 Jill Place South

Seattle, Washington 98108

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,

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Thank you for protecting our urban forest.

Cynthia Young

pearl206@aol.com

1523 NE 98th ST

Maple Leaf in North Seattle, Washington 98115

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
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

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.
- 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 Keeler

mkeeler@uw.edu

1102 NW 83rd St

Seattle, Washington 98117

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.

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.

Martha Rost

generalrost@comcast.net

1621 East Garfield Street

Seattle, Washington 98112

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 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.

joanie parsons

joanie@parsonspr.com

3047 NW 64

seattle, Washington 98107

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

CAUTION: External Email

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.

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.

Amy Hansen

pittle.r.us@gmail.com

8 Deboer Farm Ln

Asbury, New Jersey 08802

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:

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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."
- 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.

Sarajane Siegfried
Sarajane3h@comcast.net
11811 33rd Ave. NE
Seattle, Washington 98125

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 for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

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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:

- 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.

Mary Kennedy

marykatkennedy@gmail.com

7307 23rd Ave NW

Seattle, Washington 98117

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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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”.
- 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.

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

8021 11th Ave NW

Seattle, Washington 98117

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.

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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- 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.

Theano Petersen

THEANO PETERSEN

theano@comcast.net

2552 13th Ave W

Seattle, Washington 98119

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,

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 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.

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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Thank you for protecting our urban forest.

Lindsey Heller

jadelinny@gmail.com

20717 Hubbard Rd

Lynnwood, Washington 98036-7253

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

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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Thank you for protecting our urban forest.

Janet Matulia

janet.matulia@gmail.com

1958 Harvard Ave E, 201

SEATTLE, Washington 98102

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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Thank you for protecting our urban forest.

Lori Cohen

loricohen99@gmail.com

1725 NE Naomi Place

Seattle, Washington 98115

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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Thank you for protecting our urban forest.

Mia Darshan

miadarshan@gmail.com

7467 Woodlawn Ave NE

Seattle, Washington 98115

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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Sudarshan Rangaraj

suddy85248@gmsil.com

7467, Woodlawn Avenue ne

Seattle, Washington 98115

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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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.

Gordon Dass Adams

gordondass@yahoo.com

PO BOX 15268

Seattle, Washington 98115-0268

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!

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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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.

Karen Keeley

keeley.godbout@comcast.net

415 W Fulton St

Seattle, Washington 98119

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

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. We desperately need to save what's left. Future generations are depending on our doing the right thing.

Mark MacIntyre

mmseattleite@yahoo.com

1000 Bellevue Place East #8

Seattle, Washington 98102

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

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 Balich

smb@nwlink.com

331 w kinnear

Seattle, Washington 98119

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

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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SMC 25.11.090

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Thank you for protecting our urban forest.

Christa Barke

christab6@gmail.com

805 - 4th Ave. N., Apt. 108

Seattle, Washington 98109

From: Rick Lee <ricklee1@comcast.net>
Sent: Saturday, August 15, 2020 8:10 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,

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Thank you for protecting our urban forest.

Rick Lee

ricklee1@comcast.net

5210 37ave NE

Seattle, Washington 98105

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,

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Thank you for protecting our urban forest.

Kira Baum

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

2835 W Elmore St

Seattle, Washington 98199

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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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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- 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.

Tricia Sills

tcell2@yahoo.com

1743, NE 89th St

Seattle, Washington 98115

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,

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 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:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
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Woody Wheeler

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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Thank you for protecting our urban forest.

Sarah Stanley

sarah-stanley@live.com

1618 3 rd Ave W

Seattle , Washington 98119

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

3410 W Viewmont Way W

Seattle, Washington 98199

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

CAUTION: External Email

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Amber Wong

amberwong@msn.com

8651 Inverness Drive NE

Seattle , Washington 98115

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

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..Siobhan Wilder

Siobhan Wilder

bluecrowcafe@gmail.com

1528 4th Avenue West

Seattle, Washington 98119

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

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Erika Flesher

eflesher@swissnet.us

16611 NE 19th Pl

Bellevue, Washington 98008-2661

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,

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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.

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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.

shannon mcclendon
sllgatsby@yahoo.com
9025 Burke Ave N
seattle , Washington 98103

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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Thank you for protecting our urban forest.

Kathleen Myers

kdm00001@gmail.com

1336 1/2 13th Avenue South
Seattle, Washington 98144

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

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Francesca giambartolomei

FMGIAMBA@YAHOO.IT

1015 NE 105TH ST.

SEATTLE, Washington 98125

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

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

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Flora Petersen

floramarina@comcast.net

4206 NE 65th St

Seattle, Washington 98115

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

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Seattle, Washington 98115
