

Emails sent by Seattle residents regarding the tree protection ordinance through August 17, 2020. Please note that these the bulk of these emails are providing input to the Director's Rule 13-2020

From: Richard Ellison <climbwall@msn.com>

Sent: Sunday, August 16, 2020 12:48 AM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Stop allowing developers to cut down Seattle's remaining tree. The City has been promising to update the Tree Ordinance for decades, kicking the can down the road. This update of the Director's Rule will be a positive step forward.

Building affordable housing does not require cutting all the trees down! Build taller, not lot line to lot line, with the excuse every inch of open space must be concrete. Save the open space, save the trees, build taller with creative designs. Put the square footage into the sky, with big trees and open space for people to play in and old people to sit in. Where are the kids going to play? Must the new Seattle look like a concrete and steel and glass hothouse? Its gonna be record hot temperatures and the City is allowing all the trees to be cut through ignorance and greed and stupidity. Stop the loss of our limited tree scape. Plant more, preserve more open space, make more open space, don't ClearCut Seattle!

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard

height (DSH) from 30 inches

- 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.

Richard Ellison

climbwall@msn.com

8003 28th Ave NE

Seattle, Washington 98115

From: rebeccagroovypeace@gmail.com <info@email.actionnetwork.org>

Sent: Sunday, August 16, 2020 3:47 AM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

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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.

rebeccagroovypeace@gmail.com

11589 Martin Rd

Rockport, Washington 98283

From: Gayle Janzen <cgjanzen@comcast.net>

Sent: Sunday, August 16, 2020 6:12 AM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: I Urge You to adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

I'm asking you to adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements. It's long past time to move forward with updating Seattle's tree ordinance that currently is allowing way too many of our old growth trees to be clear cut by developers. We desperately need to be saving as many tall trees as we can as they are the ones that we need to combat climate chaos. Planting replacement trees is of course a step in the right direction, but it takes 50 years for them to be able to absorb the amount of CO2 that exceptional trees are now providing for us, free of charge. We are all so tired of seeing so many trees being cut down to be replaced by mega houses. We can have development without cutting down so many trees if more thought is put into the planning process. As it is now, trees appear to be nothing more than irritants standing in the way of developers' profits. That attitude needs to change.

Therefore, Seattle needs to move forward now, WITHOUT the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11

years ago and is long overdue!! How many magnificent trees have we lost during those 11 years???

The following updates as proposed in the draft Director's Rule are great steps forward:

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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

I urge you to consider the following important changes to the draft Director's Rule:

- Change Subject Title to remove words "land division" and replace with "Development"
- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."
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Areas” to ”Tree Protection Areas”.

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Our trees make the city more livable and add so much beauty to our lives. Please protect them.

Gayle Janzen

cgjanzen@comcast.net

11232 Dayton Ave N
Seattle, Washington 98133

From: William Waldman <wwaldmanmd@erols.com>
Sent: Sunday, August 16, 2020 7:41 AM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

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Thank you for protecting our urban forest.

William Waldman

wwaldmanmd@erols.com

3701 S. Hudson St. #526

Seattle, Washington 98118

From: Tony Hacker <info@email.actionnetwork.org>
Sent: Sunday, August 16, 2020 9:04 AM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

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Again, as a citizen who has dealt directly with these issues in our Madison Valley neighborhood, I urge you to adopt these crucial protections for our rapidly dwindling tree canopy. The adoption of Director's Rule 13-2020 with the above proposed amendments is the best opportunity our city has had to begin to return Seattle to being the green city it once was: green with trees not developers' money. Thank you.

Respectfully submitted,
 Tony Hacker - Save Madison Valley

Tony Hacker

tonyhackerphd@gmail.com

515 30th Ave E

Seattle, Washington 98112

From: Kristin McDonnell <info@email.actionnetwork.org>

Sent: Sunday, August 16, 2020 9:06 AM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

Seattle must protect its cherished urban forest now. In addition to creating a aesthetically pleasing environment and a source of pride for neighborhoods with historic trees, trees contribute to their environment by providing oxygen, improving air quality, climate amelioration, conserving water, preserving soil, and supporting wildlife. I strongly urge you to adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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Kristin McDonell

klmcdonell@gmail.com

3232 37th Place S

SEATTLE, Washington 98144

From: Atticus Lee <info@email.actionnetwork.org>
Sent: Sunday, August 16, 2020 9:06 AM
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Atticus Lee

atticusearth@icloud.com

17 N Garden Street

Boise, Cordoba 83706

From: Emily McLuen <em@spanishcaravan.com>

Sent: Sunday, August 16, 2020 9:12 AM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per

SMC 25.11.090

- Tightening tree removal requirements for exceptional trees as hazard trees

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

- Change Subject Title to remove words "land division" and replace with "Development"
- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."
- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as "a group of 3 or more significant trees with overlapping or touching crowns." Include street trees in groves.
- Add "Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages."
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- SECTION 4. Add "The Director shall have the authority to allow replacement trees on both public and private property to meet the goals and objectives of race and social justice under Seattle's Equity and Environment Initiative."
- Under SMC 25.11.090 the Director has the authority to require "one or more trees" to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.
- 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.

Emily McLuen

em@spanishcaravan.com

7544 Sunnyside Ave N

Seattle, Washington 98103

From: Alan Muller <info@email.actionnetwork.org>
Sent: Sunday, August 16, 2020 10:01 AM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

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Thank you for protecting our urban forest.

Alan Muller

venerablelekshay@gmail.com

609 Yesler Way, Apt 2-206

Seattle, Washington 98104-3722

From: kbeardshear@everyactioncustom.com <kbeardshear@everyactioncustom.com>
Sent: Sunday, August 16, 2020 10:01 AM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

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

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

The proposed rule can be strengthened in the following ways:

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

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

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

Sincerely,
Kristi Bierut
133 NW 173rd St Shoreline, WA 98177-3614 kbeardshear@gmail.com

From: Katherine Kaskel <info@email.actionnetwork.org>

Sent: Sunday, August 16, 2020 10:38 AM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

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Thank you for protecting our urban forest.

Katherine Kaskel

kscopy@hotmail.com

7450 E. Green Lake Dr. N.

Seattle , Washington 98115

From: Frances Williams <info@email.actionnetwork.org>

Sent: Sunday, August 16, 2020 10:41 AM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

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Thank you for protecting our urban forest.

Frances Williams

francescababy874@gmail.com

4310 36th Ave W
Seattle, Washington 98199

From: Bernice Maslan <info@email.actionnetwork.org>
Sent: Sunday, August 16, 2020 10:48 AM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: PLEASE adopt, with amendments, SDCI's Director's Rule 13-2020!

CAUTION: External Email

Sandra Pinto de Bader,

Thank you for acting on this promptly. Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. All delays result in fewer trees in our neighborhoods. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

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Bernice Maslan

bmaslan08@gmail.com

9705 1st Ave NW

Seattle, Washington 98117

From: LISA BAUER <info@email.actionnetwork.org>
Sent: Sunday, August 16, 2020 11:22 AM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

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LISA BAUER

lisa.bingbong@gmail.com

6826 49th ave. NE

Seattle, Washington 98115

From: Ed Mast <info@email.actionnetwork.org>

Sent: Sunday, August 16, 2020 11:36 AM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Save Our Trees!

CAUTION: External Email

Sandra Pinto de Bader,

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

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

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

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

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

and to track changes in the tree canopy.

6. Post online all permit requests and permit approvals for public viewing.
7. Expand SDOT's existing tree service provider's registration and certification to register all Tree Service Providers (arborists) working on trees in Seattle.
8. Provide adequate funding in the budget to implement and enforce the updated ordinance.

Ed Mast

edmast1@gmail.com

Seattle

Seattle, Washington 98107

From: Markus Volke <info@email.actionnetwork.org>
Sent: Sunday, August 16, 2020 11:49 AM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

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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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- Tightening tree removal requirements for exceptional trees as hazard trees

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

- Change Subject Title to remove words "land division" and replace with "Development"
- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."
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equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.

- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats and need to be considered at the beginning of the development process. The language of this SEPA code section should be included in the Director's Rule to be certain that the code is complied with.

- SECTION 6. SDCI should adopt SDOT's registration process and requirements to assist Tree Care Providers in complying with city code and regulations. Reduce the number of citations that will remove a Tree Care Provider from being registered with the city to no more than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor's license to ensure they have workers' compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest. We need to keep and nurture our trees!

Regards,
Markus Volke

Markus Volke
volke99@gmail.com
11331 36TH AVE NE
SEATTLE, Washington 98125

From: Ping Shen <zs58@cornell.edu>
Sent: Sunday, August 16, 2020 12:01 PM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

The respect and care with which we treat our trees is representative of the respect and care with which we treat everything else around us - our waters, our land, ourselves. Let's help preserve what we can of these magnificent creatures that provide so much for us humans and upon whom we have already wreaked so much devastation. For us, for your kids, for my kids, for their kids - please adopt this rule and its amendments. Thank you.

Ping Shen

Ping Shen

zs58@cornell.edu

2717 Western Ave #1114

Seattle, Washington 98121

From: diana herbst <info@email.actionnetwork.org>
Sent: Sunday, August 16, 2020 12:02 PM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division,

including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- 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.

diana herbst

smilesdancing4u@yahoo.com

14705 30th Ave NE
shoreline, Washington 98155

From: Aellaheh zare <info@email.actionnetwork.org>
Sent: Sunday, August 16, 2020 12:03 PM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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Thank you for protecting our urban forest.

Aellaheh zare

elahe.gzk@gmail.com

5409 Denver Ave s

Seattle , Washington 98108

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

Sent: Sunday, August 16, 2020 12:06 PM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

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

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest matters to me. Trees provide essential services to people and support over 100 local bird species. King County recently celebrated planting 1 million trees. The city should work in harmony with the county in making trees a priority. We will not successfully combat climate change or improve the resiliency of our watershed and fish without urgent protection of the remaining trees.

I attended design review meetings for some of the most damaging projects within Piper's Creek watershed and have realized how woefully inadequate our tree protections are. This includes a project at 9712 Seventh Avenue NW which will remove all trees. The development at 10420 and 10422 105th Street NW atop a steep ravine above Piper's Creek at the border of Carkeek Park should never have occurred without trees that would help prevent harmful runoff. The boards reviewing these projects do

not have any objectives other than helping the developer. There needs to be a better balance of people and interests.

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

The proposed rule can be strengthened in the following ways:

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

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

Sincerely,
Karen Kunde

9718 6th Ave NW Seattle, WA 98117-2023

karekunde@comcast.net

From: Jill Milstid <info@email.actionnetwork.org>

Sent: Sunday, August 16, 2020 12:08 PM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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requirement continues throughout any subsequent development on all lots in all zones in the city.”

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they have workers' compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

Jill Milstid

milstidjoy@yahoo.com

12420 23rd Ave S

Burien, Washington 98168

From: Julian Adams <JulianPAdams@Hotmail.com>
Sent: Sunday, August 16, 2020 12:10 PM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please Update Seattle's Tree Ordinance

CAUTION: External Email

Sandra Pinto de Bader,

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

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

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

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

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.

Julian Adams

JulianPAdams@Hotmail.com

6735 5th Ave NE

Seattle, Washington 98115

From: Dinah Coble <info@email.actionnetwork.org>

Sent: Sunday, August 16, 2020 12:13 PM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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

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Thank you for protecting our urban forest.

Dinah Coble

dinahross@mac.com

8533 31st Ave NW

Seattle, Washington 98117

From: Heidi Siegelbaum <Heidi@calyxsite.com>

Sent: Sunday, August 16, 2020 12:48 PM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 – Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

You have delayed action on this Rule for an unacceptable period of time and there is no reason to delay. You should follow the advice of your experts, the Urban Forestry Commission. Particularly now at a time of COVID where people are spending more time outside and where climate change can be mitigated in part by green infrastructure including LARGE trees as part of our public health infrastructure, you really have an incumbent duty to pass this now.

Seattle must move forward now, without the delay urged by some for political and spurious reasons, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue. You are violating your public trust obligations. The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard

height (DSH) from 30 inches (in our opinion even 24 inches is too generous- should be 18 inches really)

- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
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Thank you for finally taking action and doing something to protect mature trees when we are facing an existential public health and climate crisis.

Sincerely,

Heidi Siegelbaum and Rob Hyman
3018 NW 85th Street, Seattle, WA. 98117

Heidi Siegelbaum
Heidi@calyxsite.com
3018 NW 85th Street Apartment 5
Seattle, Washington 98117

From: Kenneth Chilcoat <info@email.actionnetwork.org>
Sent: Sunday, August 16, 2020 12:50 PM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
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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

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Thank you for protecting our urban forest.

Kenneth Chilcoat

krchilcoat@gmail.com

23406 48th Ave W

Mountlake Terrace, Washington 98043

From: Gerilyn Denny <info@email.actionnetwork.org>
Sent: Sunday, August 16, 2020 12:57 PM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

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Thank you for protecting our urban forest.

Gerilyn Denny

gerilyndenny1@gmail.com

1800 S Jackson St #205

Seattle, Washington 98144

From: pkarovsky@yahoo.com <info@email.actionnetwork.org>

Sent: Sunday, August 16, 2020 1:18 PM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

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Thank you for protecting our urban forest.

pkarovsky@yahoo.com

533 30th ave E

Seattle, Washington 98112-4204

From: Glenn Bristol <info@email.actionnetwork.org>
Sent: Sunday, August 16, 2020 1:32 PM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

Dear SUFC Commissioners,

I have been a Seattle resident since 2009, and I have seen firsthand how well the existing tree protection rules are enforced by SDOT on its own projects, and the significant laxity or willful ignorance when it comes to private development projects, which do not take these rules seriously, and are happy to clear away trees even in violation. Their flouting of the law needs to stop today. We need to strengthen these rules immediately, and provide funding for rigorous enforcement.

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Thank you for protecting our urban forest.

Glenn Bristol

glennbristol@outlook.com

729 23rd Ave, Lower Unit

Seattle, WA, Washington 98222

From: Angela Crouch <angelina4242@comcast.net>
Sent: Sunday, August 16, 2020 1:32 PM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

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Angela Crouch
angelina4242@comcast.net
2500 Montavista Pl W
Seattle, Washington 98199

From: jack Bautsch <jbautsch@comcast.net>
Sent: Sunday, August 16, 2020 1:33 PM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

Urban tree canopy is so important to our physical, psychological, emotional health as individuals and as a community, and we are losing it at an alarming and depressing rate! We have tried for over a decade to strengthen Seattle's Tree Ordinance. Now is the time to take some action! Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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jack Bautsch

jbautsch@comcast.net

1112 nw 83rd street

seattle, Washington 98117

From: Rea Facer <info@email.actionnetwork.org>

Sent: Sunday, August 16, 2020 1:35 PM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

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Rea Facer

reaxanf@gmail.com

2850 Northwest 56th Street
Seattle, Washington 98107

From: Katrina Spade <info@email.actionnetwork.org>
Sent: Sunday, August 16, 2020 1:47 PM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

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- 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.

Katrina Spade

katrinaspade@gmail.com

202 13th Avenue East

Seattle, Washington 98102

From: Richard Nicol <rlnicol@msn.com>
Sent: Sunday, August 16, 2020 1:51 PM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection

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

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees

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This pandemic has made it clear that our priorities as a society must change. We need to start caring for one another and also to protect the natural world we all share on this planet. Nature, and especially our trees, are a great solace for the massive loss and sorrow that we are currently suffering. Please act to preserve our beautiful trees which are always a source of comfort and now more than ever. Developers should be willing to forego some profit to make the world a better place for all of us, also for them. Every square foot of property need not be ravaged for a few extra dollars. Please adopt Director's Rule 13-2020 immediately. Do not wait until many more of our magnificent trees are lost.

Respectfully and urgently submitted. Richard Nicol in Ballard

Thank you for protecting our urban forest.

Richard Nicol

rlnicol@msn.com

1414 Northwest 62nd Street

Seattle, Washington 98107

From: Jane Nichols <janenic@earthlink.net>

Sent: Sunday, August 16, 2020 1:55 PM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

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Thank you for protecting our urban forest.

Jane Nichols

janenic@earthlink.net

191 35th Ave E

Seattle, Washington 98112

From: Ellen Hale <us_chickens@earthlink.net>

Sent: Sunday, August 16, 2020 2:02 PM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

I am writing to agree heartily with the many tree advocates making this request of the city council. Today, as temperatures rise into the 90's, the cooling role of trees is unmistakable. Cities less 'green' than our Emerald City protect their carbon-storing, bird and beast hosting, rain filtering, soul restoring, soil opening, air purifying things of beauty. We must act now to protect what trees remain — rather than regret their loss later. I have read the ordinance and urge it's passage. I support it for the reasons below.

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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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.

Ellen Hale

us_chickens@earthlink.net

13740 19th Ave NE

Seattle, Washington 98125

From: maggieb180@everyactioncustom.com <maggieb180@everyactioncustom.com>
Sent: Sunday, August 16, 2020 2:05 PM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a supporter of Seattle Audubon, protecting Seattle's urban forest is important to me. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city. I am also a volunteer forest steward for Green Seattle Partnership in Magnuson Park. I have spent the last eight years doing ecological restoration to help native plants reestablish in one of our lovely city parks.

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

The proposed rule can be strengthened in the following ways:

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

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

The most important thing we can do for Seattle's urban forest is to protect the trees we already have. Each one is so precious!! Please do not let any more vanish from our city. Please strengthen and implement this Director's Rule now and continue working with the Urban Forestry Commission, Seattle communities, and our elected officials to update the City's tree protection ordinance.

Sincerely,
 Barbara Broderick
 3911 NE 82nd St Seattle, WA 98115-4941
 maggieb180@comcast.net

From: Susan Niemann <info@email.actionnetwork.org>
Sent: Sunday, August 16, 2020 2:19 PM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

Susan

Susan Niemann

seniemann@gmail.com

8843 28th Ave nw
Seattle, Washington 98117

From: Sarah Trethewey <info@email.actionnetwork.org>
Sent: Sunday, August 16, 2020 2:23 PM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

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Sarah Trethewey

sarahbtrethewey@gmail.com

530 30th Ave E

Seattle, Washington 98112

From: Janet Way <info@email.actionnetwork.org>
Sent: Sunday, August 16, 2020 2:40 PM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

Janet M Way

940 NE 147th St

Shoreline, WA 98155

August 16, 2020

Nathan Torgelson,
Director Seattle Department of Construction and Inspections (SDCI)
700 5th Ave
Seattle, WA 98124

RE: Urban Forestry Commission (UFC) comments on SDCI Director's Rule 13-2020

Dear Mr Torgelson:

Please accept my comments regarding the SDCI Director's Rule, 13-2020.

I am writing as a Tree Advocate, a member of the TreePAC Board, and an active Sierra Club member (Vice-Chair of Sno-Isle Group). I am also chair of the Shoreline Preservation Society and therefore I feel I have legal standing as a neighbor living almost directly across the City Line and am impacted by decisions and actions taken by Seattle on the matter of Urban Forestry. In addition, I also served on the Community Forestry Council for Department of Natural Resources in 2009, which formulated State Policy on the Evergreen Communities Act. As such, please make me a Party of Record on this matter.

I am strongly supporting the Urban Forestry Commission's recommendations updating the Director's Rule on "Exceptional Trees", and encourage the expansion of these "Significant Trees" and guidance to tree-car providers, on Hazard Trees, and on SEPA requirements.

I support the following elements of the proposed Director's Rule changes, because our region faces dire consequences from impending impacts of Climate Change. These include issues of Health, Environmental Justice, Water and Air Quality, and Economic consequences of loss of Seattle's historic Urban Forest ecosystems. It is vital that Seattle protect its valuable existing trees, especially because only relying on new required tree plantings, leaves the community without the current values these trees provide, especially the shade with prevents "Heat Island Effect." Our existing exceptional and significant trees are our most economic and effective way to prevent Climate Change! On a day like today (August 16. 2020) when temperatures are expected to reach the upper 90 Degree levels, it is very clear why these existing trees are important!

These UFC recommendations should be followed accurately:

A. The UFC supports the following in proposed Director's Rule 13-2020:

- Reducing the upper threshold on exceptional trees to 24 inches diameter at standard (DSH) from 30 inches DSH.
- Clarifying the definition of a significant tree.

- Requiring tree care provider registration with the City.

Acknowledging tree protection and retention starting with the platting process.

- Continuing tree grove protection even if a tree is removed from a grove.
- Acknowledging that exceptional trees removed during development must be replaced under existing SMC 25.11.090.
- Tightening requirements for removal of exceptional trees as hazard trees.
- Expanding the scope of the Director's Rule to include more protections and clarity, and
- Developing a tree tracking worksheet.

B. The UFC recommends adding language on the scope and intent of the Director's Rule 13-2020 to capture current code's intent to maximize retention of existing trees 6 inches DSH and larger throughout the development process. Proposed new text to be added to the Director's Rule: "To meet Seattle's 2035 Comprehensive Plan goals and tree protection code, all development projects in all zones across the city shall be designed to maximize the retention of existing trees 6 inches DSH and larger." The inclusion of this provision would not limit the development potential of a lot as it still allows SDCI the authority to approve removal of significant trees and exceptional trees if necessary, to complete a project. Clarifying that a development project must be "designed to maximize the retention of existing 2 trees" would, however, give SDCI the authority to stop unnecessary clearcutting of lots that is occurring as well as excessive and unnecessary removal of trees not impacted by the development. The priority should be to protect existing trees that are already providing environmental services and benefits to the city, rather than planting replacement trees for those removed. Policies for the protection of exceptional trees would not be altered.

The following information is provided in support of this recommendation: Existing code SMC 23.22 requires that all trees at least six inches DSH be indicated on site plans and retained as much as possible throughout the development process. Several sections of the code already imply this intent:

- SMC 23.22.020 A: "Every preliminary plat application shall consist of one or more maps together with written data including the following... Specific location and description of all trees at least 6 inches in diameter measured 4½ feet above the ground, with species indicated."
- SMC 23.22.054 A: "...if [the Hearing Examiner] finds that the proposed plat...is designed to

maximize the retention of existing trees... then it shall be approved"

- SMC 23.24.020: "Applications for approval of a short subdivision shall include the following: ... F. Specific location and description of all trees at least 6 inches in diameter measured 4.5 feet above the ground, with complete scientific and common names of species indicated."

- SMC 23.24.040 A: "The Director shall, after conferring with appropriate officials, use the following criteria to determine whether to grant, condition, or deny a short plat: ... 7. Whether the proposed division of land is designed to maximize retention of existing trees;" Specifically, as identified in the existing code, "tree" clearly means any tree six inches DSH or larger and does not just refer to exceptional trees. Therefore, the Director's Rule should clarify that maximizing the retention of all significant trees is part of development designs. This follows from the goals in the 2035 Seattle Comprehensive Plan: The 2035 Seattle Comprehensive Plan in the Environment Section, Land Policies states: "EN1.1 Seek to achieve an urban forest that contains a thriving and sustainable mix of tree species and ages, and that creates a contiguous and healthy ecosystem that is valued and cared for by the City and all Seattleites as an essential environmental, economic, and community asset." "EN 1.2 Strive to increase citywide tree canopy coverage to 30 percent by 2037 and to 40% over time." SMC 25.11 further clarifies in the purpose and intent section guidance for protecting trees: SMC 25.11.010: It is the purpose and intent of this chapter to:

"A. Implement the goals and policies of Seattle's Comprehensive Plan especially those in the Environment Element dealing with the protection of the urban forest.

B. To preserve and enhance the city's physical and aesthetic character by preventing untimely and indiscriminate removal and destruction of trees." We note that SMC 25.11 expands tree protection, established by SMC 23, by giving additional protection to exceptional trees. However, to maintain a specific tree species and a thriving urban forest, it is not enough just to maintain the largest specimens. Big, old trees will inevitably die. Trees of varying ages must be protected to replace those that are lost to old age. Otherwise, there will be a significant loss of tree canopy area and volume and its associated environmental services over time. The following section of SMC 25.11 discusses potential exceptional trees: SMC 25.11.050 (General Provisions for exceptional tree determination and tree protection area delineation in Single Family, Residential Small Lot, Lowrise, Midrise, and Commercial zones):

"Exceptional trees and potential exceptional trees shall be identified on site plans and exceptional tree status shall be determined by the Director according to standards promulgated by the Seattle Department of Construction and Inspections." Additionally, SMC 25.11.100 gives the Director broad discretion on protecting trees as outlined in the purpose and intent of SMC 25.11 and its other provisions: "SMC 25.11.100

A. Authority. The Director shall have authority to enforce the provisions of this chapter, to issue permits, impose conditions, and establish administrative procedures and guidelines, conduct inspections, and prepare the forms necessary to carry out the purposes of this chapter."

C. The UFC makes the following additional recommendations on the proposed Director's Rule 13- 2020: SUBJECT Revise the Subject section to read: "Designation of Exceptional and Significant Trees, Tree Protection and Retention, and Tree Removal During Development, Including Tree Service Provider Requirements". This ensures consistency with the UFC recommendation in section

B. of this letter and a consistent capitalization scheme. PURPOSE AND BACKGROUND After the first paragraph add: "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."

SECTION 1.

DEFINITIONS 1. Include the SMC 25.11.020 definition of exceptional tree: "Exceptional tree" means a tree or grove of trees that because of its unique historical, ecological, or aesthetic value constitutes an important community resource and is deemed as such by the Director according to standards promulgated by the Seattle Department of Construction and Inspections.

2. Add a definition for "Tree". The UFC suggests using the International Society of Arboriculture's definition: "Tree" means a woody perennial usually having one dominant trunk and a mature height greater than 5 meters (16 feet). Some trees develop more than one stem or trunk. Trees do not include any species which appear on the King County Noxious Weeds or Weeds of Concern list.

3. Under “Trees not considered exceptional,” the language “have defects or damage that now or in the foreseeable future will result in increased poor health condition and/or limited life expectancy” is vague and open to different interpretations. Consider phrases such as ‘permanent damage’ and ‘continued declining health,’ to reduce guess work and arbitrary timeframes that may vary greatly by species, health, and site conditions. Additionally, the notion of ‘defects in the foreseeable future resulting in limited life expectancy’ is so general that it could arguably be applied to all trees in urban areas. Please avoid dangerously loose definitions that would allow for the continued over-identification of ‘hazard trees.’

4. Please remove special characterization for red alders, black cottonwoods, and bitter cherries as ‘never exceptional.’ This stipulation adds undue complexity to the rules and removes possible tree protections. These red alders, black cottonwoods, and bitter cherries are native trees that have important roles in our ecosystems and for wildlife. Following a “right tree, right place” philosophy, these trees can safely thrive and contribute to our urban canopy.

5. Add the following sentence: “Many significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for large exceptional trees when they die. Development projects must be designed to maximize the retention of existing trees six inches DSH and larger to maintain a diversity of tree species and ages.”

6. Tree groves: The UFC recommends removing the exclusion of street trees from tree groves. Street trees are often planted and maintained by adjacent property owners or unidentified as street trees. This street tree exclusion adds undue complexity and has no ecological basis. They are no different than a grove of trees located across property lines on abutting and/or adjacent lots. UFC also recommends using a reduced significance threshold of six inches for defining trees in a grove. This again reduces complexity and aligns with the rest of the rules and code. Additionally, in that groves are a function of adjoining canopy, not stem size, this threshold would be a more accurate metric to gauge grove function and formation. The UFC also recommends that the minimum number of trees required to constitute a grove be reduced to three. Kirkland, Woodinville and Duvall define a tree grove as three or more trees at least six inches DSH or larger.

SECTION 2. EXCEPTIONAL TREE PROTECTION

1. The UFC urges the removal of “EXCEPTIONAL” from the Director’s Rule heading. Each of these protections listed apply to all trees six inches DSH and larger.

2. Exceptional Trees during Platting. The UFC recommends removing “Exceptional” from

subsection heading. The platting criteria apply to all trees six inches DSH and larger, not just exceptional trees.

3. The UFC recommends adding the following language after the second paragraph: “The tree retention policy initiated to maximize the retention of existing trees six inches DSH and larger during platting in SMC 23 continues through any subsequent development of lots in all zones in the city.”

4. The UFC recommends revising the last sentence to read: “All plats and subsequent development site plans shall contain the following notation: Pruning and removal of trees as well as future development must comply with City of Seattle tree retention regulations including: SMC 23 - Land Use Code; SMC 25.11 - Seattle Tree Protection Code; SMC 25.05 – SEPA; and SMC 25.09 - Environmental Critical Areas Code.

5. Allowable Encroachment in Exceptional Tree Protection Areas During Proposed Development: Remove “Exceptional” from subsection heading. These rules apply to all tree six inches DSH or greater. Clarify in this section that tree protection areas must include all trees being retained, not just exceptional trees.

SECTION 3. EXCEPTIONAL TREE REMOVAL

1. The UFC recommends simplifying the third paragraph, as certified professionals are familiar with the details. The UFC recommends simply stating: “The tree risk assessment must conclude that the exceptional tree is a “high” risk hazard using the tree risk assessment methodology and criteria established by the International Society of Arboriculture (ISA) and that the risk cannot be mitigated by 5 pruning, cabling, bracing or other means that would preserve the tree.” And removing the list of bulleted conditions.

2. Tree Risk Assessment Required for Tree Removal, fourth paragraph: revise the definition of “qualified professional” for clarity. Specifically, it is unclear what “three years’ experience in tree evaluation” means. Candidates for ISA Tree Risk Assessment Qualification must already have three years of full-time experience in arboriculture or a combination of education and practical experience. The UFC suggests aligning the language in this section with the language provided by Kirkland’s code (Section 95.10).

3. Tree Risk Assessment Required for Tree Removal section, fifth paragraph and associated bulleted list. The third bullet: “International Society of Arborists” should be “International Society of Arboriculture.” The “and/or” conjunctions obscure the meaning of this bullet point and the education requirements are not clearly connected to arboriculture or forestry. These

educational requirements may be redundant anyway, as the ISA Certified Arborist credential has clear experiential and educational requirements for eligibility and certification maintenance. Further educational requirements by the city may disproportionately impact arborists who may have not had the resources for post-secondary education. If the educational requirements are necessary, the point could be clarified by the following: • International Society of Arboriculture (ISA) Certified Arborist with at least one of the following: o Associate Degree with at least two courses related to arboriculture or urban forestry; o Two years college-level credits with at least two courses related to arboriculture or urban forestry, and/or o 120 Continuing Education Units relating to tree care.

4. Add statement: The UFC recommends adding the statement that “the Director has the authority to conduct inspections... to enforce the provisions of this chapter” as established in SMC 25.11.100. The UFC believes that 25.11 gives SDCI the authority to enter private property to ensure that violations of the ordinance are not taking place, and recommends adding language to that effect. Violations would include possible illegal removal of exceptional trees or removing more than three significant, nonexceptional trees per year.

SECTION 4. REQUIRED MITIGATION FOR ALLOWED TREE REMOVAL

1. In the first paragraph The UFC recommends adding a sentence at end: “The Director shall have the authority to allow trees to be planted on private property to meet the goals and objectives of race and social justice under Seattle's Equity and Environment Initiative.”
2. Require that a certified arborist either be present on the work site or visit the site and sign off prior to the specific work being done
3. Require that tree removal and replacement applications be posted on development sites and on the City’s website as soon as they are received and for them to remain until exceptional trees can be removed. This includes both healthy and hazard exceptional trees.
4. Tree replacement needs to have an associated timeframe requirement. By what time is the applicant required to replace the removed tree? What if the tree is removed at the start of summer? Best practice in Seattle is to plant trees in autumn. The UFC suggests, “All replacement trees shall be planted in October through December and no later than 12 months after removal. The applicant shall prepare and, if necessary, amend the existing soil conditions...”
5. All replacement trees, regardless of their size, are protected trees. When planted on development sites trees must be maintained by the property owner, or designee for the life of

the project (to be consistent with Director's Rule 11-2020: Landscaping Standards and Green Factor). To help ensure 6 survival and proper establishment of replacement trees wherever they are planted, they shall be watered during the summer months for a minimum of 5 years. If replacement trees die or are removed, they must be replaced.

6. For Table 1, a single column header spans two columns and is not the easily understood; the UFC suggests revising to two headings. The UFC also recommends adding notation to indicate native species as below: Tree Species DSH at which becomes Exceptional ALDER, Sitka – *Alnus sinuate* 6" APPLE, Orchard (Common) – *Malus* sp. 20" ASH, European – *Fraxinus excelsior* 22" ASPEN, Quaking – *Populus tremuloides** 12" *Native to Washington state.

7. For Table 1's record for WILLOW species. All specific epithets, subspecies, and variety names should be lower case, and species varieties should be indicated by "var." instead of "ver." The entry should read: WILLOW (All native species) – *Salix* sp. (*geyeriana* var. *meleina*, *eriocephala* ssp. *mackenzieana*, *hookeriana*, *piperi*, *scouleriana*, *sitchensis*) 8"

8. Preference for replacement trees shall be selected from a City list of comparable native trees or trees that meet future climate criteria. Evergreen trees shall have preference over deciduous trees.

9. Under SMC 25.11.090 the Director has the authority to require "one or more trees" to be planted as replacement trees for exceptional trees removed during development. The number of trees required in such instances should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years or less. Any in lieu fee adopted if the tree or trees cannot be replaced on site must also rise as the size of the removed tree increases.

SECTION 5: USE OF THIS RULE IN THE APPLICATION OF SEPA

1. This section needs to accurately communicate the SEPA requirements as enumerated in SMC 25.05.675 N. These requirements are for protecting special habitats and should be considered at the beginning of the process. The policy language calls for the City to protect special habitats. The specific language should be included, as in previous drafts of this Director's Rule, to leave no ambiguity. Current language suggests it pertains only to perhaps saving an exceptional tree rather than giving protection to trees and vegetation that comprise special or unique habitat, including tree groves. Exact SMC 25.05.675 N. wording below:

2.Policies

a. It is the City's policy to minimize or prevent the loss of wildlife habitat and other vegetation which have substantial aesthetic, educational, ecological, and/or economic value. A high priority shall be given to the preservation and protection of special habitat types. Special habitat types include, but are not limited to, wetlands and associated areas (such as upland nesting areas), 7 and spawning, feeding, or nesting sites. A high priority shall also be given to meeting the needs of state and federal threatened, endangered, and sensitive species of both plants and animals.

b. For projects that are proposed within an identified plant or wildlife habitat or travelway, the decisionmaker shall assess the extent of adverse impacts and the need for mitigation.

c. When the decisionmaker finds that a proposed project would reduce or damage rare, uncommon, unique, or exceptional plant or wildlife habitat, wildlife travelways, or habitat diversity for species (plants or animals) of substantial aesthetic, educational, ecological, or economic value, the decisionmaker may condition or deny the project to mitigate its adverse impacts. Such conditioning or denial is permitted whether or not the project meets the criteria of the overview policy set forth in Section 25.05.665.

d. Mitigating measures may include but are not limited to:

- 1) Relocation of the project on the site;
- 2) Reducing the size or scale of the project;
- 3) Preservation of specific on-site habitats, such as trees or vegetated areas;
- 4) Limitations on the uses allowed on the site;
- 5) Limitations on times of operation during periods significant to the affected species (e.g., spawning season or mating season); and 6) Landscaping and/or retention of existing vegetation.

2. The complexity of all the codes and requirements relevant for tree protections again suggests that SDCI needs to, like SDOT has done for street trees, put all the requirements in one manual rather than having people search through many different SMCs, TIPS, and Director's Rules to figure out what to do. Here is SDOT's Street Tree Manual. This would make it a lot easier for residents, developers, tree care providers, and others to understand the code.

SECTION 6. TREE CARE PROVIDER ACKNOWLEDGEMENT

1. The UFC suggests that SDCI follow more closely SDOT's Tree Service Provider Registration language. Change the title of the form to "SDCI Tree Service Provider

Registration” rather than “acknowledgement.” SDOT calls them Tree Service Providers, the UFC recommends using the same term.

2. More than three citations during a one-year period before a tree service provider is removed from the City’s list to do business in Seattle is overly generous. Please reduce the number of citations per oneyear period to two.

3. Require annual registration, same as Seattle business licenses require, so that tree service providers can confirm who their current licensed arborists are and review and acknowledge any updated code language and regulations. Otherwise as personnel change in a company, data filed with the City may quickly become outdated and the company will not be confirming they are aware of any code and regulation changes.

4. The UFC recommends that SDCI require tree service providers to submit the same documents and certifications as SDOT tree service provider registration requires:

- WA state contractor license (L&I) to ensure workers have ability to get worker's compensation if injured.
- City of Seattle Business license - annual 8
- Certificate of Insurance - City of Seattle must be listed as additional insured. (See SDOT Client Assistance Memo (CAM) 2102 for their detailed instructions. Not having Seattle being listed as additional insured opens them up to being sued for accidents and harm.
- If the business has a current Street Use Annual Vehicle Permit, provide the permit number.
- Require that a certified arborist either be present on work site or sign off on all work

5. Require that tree removal and replacement permits be posted on development site where exceptional trees will be removed.

So to sum up, please pass and implement these detailed and valuable recommendations of Seattle’s own Urban Forestry Commission. They will make a huge difference to your community’s Quality of Life, the Health of your constituents, their families and their Environmental Rights to Clean Air, Water and Open Space and Recreation and protection from devastating impacts of Climate Change that is bearing down on all of us, as we speak.

Respectfully Submitted,

Janet M Way

Janet Way

janetway@yahoo.com

940 NE 147th Street

Shoreline, Washington 98155

From: Wendy Lagazzino <lagoz@q.com>

Sent: Sunday, August 16, 2020 2:43 PM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

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.

Wendy Lagozzino

lagoz@q.com

2811 Queen Anne Ave N

Seattle, Washington 98109

From: Steve Dunnington <info@email.actionnetwork.org>

Sent: Sunday, August 16, 2020 2:49 PM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

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- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats and need to be considered at the beginning of the development process. The language of this SEPA code section should be included in the Director’s Rule to be certain that the code is complied with.
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Thank you for protecting our urban forest.

Steve Dunnington

dunnington50@gmail.com

7814 39th Ave SW
Seattle, Washington 98136

From: Abigail Hoehne <info@email.actionnetwork.org>
Sent: Sunday, August 16, 2020 3:12 PM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

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Thank you for protecting our urban forest.

Abigail Hoehne

abigailehoehne@gmail.com

524 N 67th St

Seattle, Washington 98103

From: Pamela Austin <freeandflying@live.com>

Sent: Sunday, August 16, 2020 3:18 PM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

As I sit in my small condo drafting this letter, the temperature outside is expected to reach well into the 90's. Our city residents need the cooling shelter of our precious trees. We have already lost too many of our sheltering trees. Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider

requirements.

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- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees

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

- Change Subject Title to remove words "land division" and replace with "Development"
- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."
- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as "a group of 3 or more significant trees with overlapping or touching crowns." Include street trees in groves.
- Add "Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages."
- Add "All replacement trees regardless of size are protected trees and can't be removed."

- SECTION 2. Change the heading to “TREE PROTECTION”. Remove references to “Exceptional Trees” only and change to “Trees”. e.g., change “Exceptional Tree Protection Areas” to “Tree Protection Areas”.
- SECTION 4. Add “The Director shall have the authority to allow replacement trees on both public and private property to meet the goals and objectives of race and social justice under Seattle’s Equity and Environment Initiative.”
- Under SMC 25.11.090 the Director has the authority to require “one or more trees” to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.
- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats and need to be considered at the beginning of the development process. The language of this SEPA code section should be included in the Director’s Rule to be certain that the code is complied with.
- SECTION 6. SDCI should adopt SDOT’s registration process and requirements to assist Tree Care Providers in complying with city code and regulations. Reduce the number of citations that will remove a Tree Care Provider from being registered with the city to no more than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor’s license to ensure they have workers’ compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

Sincerely,

Pamela Austin

Pamela Austin

freeandflying@live.com

7320 E Green Lake Dr N #204

Seattle, Washington 98115

From: Mary Schlater <info@email.actionnetwork.org>

Sent: Sunday, August 16, 2020 3:19 PM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

Dear Seattle City council members and Mayor Durkan,

I am a resident in the Victory Heights neighborhood in northeast Seattle near Northgate. We have seen a significant amount of large trees cut in our neighborhood with little regard for altering building designs to preserve these irreplaceable trees. There are way too many loopholes in the SDCI building permit process. Just next door to us at 12003 22nd Ave NE, a builder proceeded with cutting trees on a Saturday and did not have first ground inspection in place. SDCI was notified on the Wednesday prior that this was going to occur soon and no one was sent to inspect the property before trees were cut. On the Monday after the trees were cut SDCI said that the first ground inspection was issued on that Monday. Therefore, the builder was not held accountable for proceeding without a permit. Also he removed 2 large Douglas Firs without a SDOT right of way permit in place. The SDOT was notified and they merely came out and took pictures of what was occurring but work continued. They also confirmed that this builder had proceeded without a proper permit in place but again there doesn't seem to have been any consequences to the builder. This does not inspire much confidence that builders will be held accountable even if we do tighten the Director's rule.

There are many other loopholes such as poor enforcement likely due to understaffing and underfunding and lack of accountability on the part of SDCI.

That said, I whole heartedly encourage you to pass this Director's Rule with the amendments listed below because is at least a step in the right direction. Trees should be preserved in all neighborhoods in Seattle, not just the wealthy ones. Everyone should be able to enjoy the Emerald city trees to just a few. While the Council has passed the Green New Deal, I have not seen evidence of preserving what is green in our city particularly our trees. And given COVID 19, Seattle residents need more green space with trees not less. We urgently need to stop the frequent and unabated cutting of our large trees and consider smarter development where as many trees as possible are preserved and protected through requiring altered designs to protect them. And that needs to be properly enforced. I am asking you to do the following,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
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The following changes to the draft Director's Rule are needed:

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Thank you for protecting our urban forest.

Mary Schlater

12003 23rd Ave NE

Seattle, WA, 98125

Email: mschlater7108@gmail.com

Mary Schlater

mschlater7108@gmail.com

12003 23rd Ave NE

Seattle, Washington 98125

From: Shellay Maughan <info@email.actionnetwork.org>

Sent: Sunday, August 16, 2020 3:27 PM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

Shellay Maughan

matertiamat@hotmail.com

3816 ne 113th st
Seattle , Washington 98125

From: Rick Fox <info@email.actionnetwork.org>
Sent: Sunday, August 16, 2020 3:29 PM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

Rick Fox

rickfox@gmail.com

17005 137th pl se

Renton , Washington 98058

From: Christopher King <Cmking@seanet.com>

Sent: Sunday, August 16, 2020 3:36 PM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

This is important!

Christopher King

Cmking@seanet.com

3618 Ashworth Ave N

Seattle, Washington 98103

From: Jill Van Osdell <info@email.actionnetwork.org>
Sent: Sunday, August 16, 2020 3:40 PM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Immediately adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

Jill Van Osdell

jvanos1@hotmail.com

2033 NW 62nd St

Seattle, Washington 98107

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

Sent: Sunday, August 16, 2020 3:45 PM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

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

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

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

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

The proposed rule can be strengthened in the following ways:

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

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

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

Sincerely,
 Diana Kunde
 1506 NE 140th St Seattle, WA 98125-3226 dikunde@sbcglobal.net

From: Carol Olwell <info@email.actionnetwork.org>
Sent: Sunday, August 16, 2020 3:48 PM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

The increasing effects of climate change warrant a change in Seattle's tree policy to give trees better protection.

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Thank you for protecting our urban forest.

Carol Olwell
cjolwell@gmail.com

2117 5th Ave. West
Seattle, Washington 98119-8909

From: Ilse Kluge <info@email.actionnetwork.org>
Sent: Sunday, August 16, 2020 3:50 PM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

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

- Change Subject Title to remove words "land division" and replace with "Development"
- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."
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Thank you for protecting our urban forest.

Ilse Kluge

ivkluge@gmail.com

1550 NW 195th St Unit 105

Shoreline, Washington 98177-2855

From: Judy Siehl <info@email.actionnetwork.org>
Sent: Sunday, August 16, 2020 4:13 PM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

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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I am heartily in favor of these proposed changes. We need trees for so many reasons: shade, lowering air pollution, creating oxygen, beauty, home for birds, to name a few. We need to act now to keep our landscape people friendly and to avoid the "urban canyons" look which can harden the soul. I urge you support our trees, wherever they are, but especially in densely populated areas, not just single home communities. I am hoping that you will consider the needs of ordinary citizens over the wishes of developers. Let's continue to have heart and concern for residents.

Thank you for protecting our urban forest.

Best wishes to you--

Judy Siehl

Judy Siehl

judithsiehl@gmail.com

2040 13th Ave W Apt 21

Seattle, Washington 98119

From: Frank I Backus <info@email.actionnetwork.org>
Sent: Sunday, August 16, 2020 4:23 PM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

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Thank you for protecting our urban forest.

Frank I Backus

frankbackus1@gmail.com

450 NE 100TH ST APT 624

Seattle, Washington 98125-8028

From: Elizabeth Edlund <info@email.actionnetwork.org>

Sent: Sunday, August 16, 2020 5:16 PM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Seattle needs to maintain or grow its tree coverage, not lose it. Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue. Seattle needs to maintain and grow its green canopy, not continue to lose it.

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Thank you for protecting our urban forest.

Sincerely,
Elizabeth Edlund

Elizabeth Edlund
dangermouse66@gmail.com
9917 15th Ave NW
Seattle, Washington 98117

From: Theresa Huey <info@email.actionnetwork.org>
Sent: Sunday, August 16, 2020 5:34 PM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

Theresa Huey

trhuey@aol.com

4220 S Lucile St

Seattle, Washington 98118

From: Andrea Swope <info@email.actionnetwork.org>
Sent: Sunday, August 16, 2020 5:44 PM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Keep Seattle Livable!

CAUTION: External Email

Sandra Pinto de Bader,

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

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

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

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

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

Tree Service Providers (arborists) working on trees in Seattle.

8. Provide adequate funding in the budget to implement and enforce the updated ordinance.

Andrea Swope

andswope@aol.com

232 NW 52ND ST

Seattle, Washington 98107

From: Matt Clark <info@email.actionnetwork.org>

Sent: Sunday, August 16, 2020 5:57 PM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

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Matt Clark

mattus@gmail.com

1240 NE 91St St

Seattle, Washington 98115

From: Amy Bosch <info@email.actionnetwork.org>
Sent: Sunday, August 16, 2020 5:59 PM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

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- Add “All replacement trees regardless of size are protected trees and can’t be removed.”
- SECTION 2. Change the heading to “TREE PROTECTION”. Remove references to “Exceptional Trees” only and change to “Trees”. e.g., change “Exceptional Tree Protection Areas” to “Tree Protection Areas”.
- SECTION 4. Add “The Director shall have the authority to allow replacement trees on both public and private property to meet the goals and objectives of race and social justice under Seattle’s Equity and Environment Initiative.”
- Under SMC 25.11.090 the Director has the authority to require “one or more trees” to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.
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Thank you for protecting our urban forest.

Amy Bosch

boschschesmosch@gmail.com

1128 15th Ave
Seattle, Washington 98122

From: Chandan Rastogi <info@email.actionnetwork.org>
Sent: Sunday, August 16, 2020 6:06 PM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

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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- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
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Thank you for protecting our urban forest.

Chandan Rastogi

chandan0102@hotmail.com

500 3rd Ave W APT 111

Seattle, Washington 98119

From: Jon Lisbin <info@email.actionnetwork.org>

Sent: Sunday, August 16, 2020 6:11 PM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

Do what's right. We only have one earth. Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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Thank you for protecting our urban forest.

Jon Lisbin

lisbinator@gmail.com

32nd ave nw

Seattle, Washington 98117

From: David Reusch <info@email.actionnetwork.org>

Sent: Sunday, August 16, 2020 6:11 PM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

Intelligent development CAN coexist with preservation of our natural resources. The Director's Rule is a sensible way to accomplish this with respect to our invaluable treescape. Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

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Thank you for protecting our urban forest.

David Reusch

dbreusch@me.com

7408 E Green Lake Dr N Apt A

Seattle, Washington 98115

From: Luke Armitstead <info@email.actionnetwork.org>

Sent: Sunday, August 16, 2020 6:37 PM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

Luke Armitstead

lukearmit@gmail.com

1816 27th Ave unit A

Seattle, Washington 98122

From: Jane Dewell <info@email.actionnetwork.org>
Sent: Sunday, August 16, 2020 6:45 PM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

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Jane Dewell
dewelljane@aol.com
11327 23rd Ave NE
Seattle, Washington 98125

From: Susan Price <info@email.actionnetwork.org>
Sent: Sunday, August 16, 2020 6:50 PM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

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Susan Price

prices08@gmail.com

5133 48th Ave NE

Seattle, Washington 98105

From: Reda Tipton <Redabook@comcast.net>

Sent: Sunday, August 16, 2020 6:52 PM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

We love our Emerald City!

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Thank you for protecting our urban forest.

Reda Tipton

Redabook@comcast.net

135 N 105th St, #204
Seattle , Washington 98133

From: Rebecca Collias <info@email.actionnetwork.org>
Sent: Sunday, August 16, 2020 7:08 PM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

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.

Rebecca Collias

rlcdancer@gmail.com

6003 Greenwood Ave N

Seattle, Washington 98103

From: Denise Drrr <drnisederr@live.con>

Sent: Sunday, August 16, 2020 7:09 PM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

Denise Drrr

drnisederr@live.com

2912 4th Ave. W

Seattle , Washington 98119

From: Norah Scully <info@email.actionnetwork.org>

Sent: Sunday, August 16, 2020 7:14 PM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

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.

We are rapidly losing large trees in Seattle and neighbors have been forced to fight hard to save them from developers' bulldozers. With thoughtful design it should be possible to both increase density and retain significant trees. We desperately need stronger protections for trees, now.

Thank you for protecting our urban forest.

Norah Scully

scullynorah@gmail.com

1414 NW 62nd St.

Seattle, Washington 98107

From: jan mik <janmikus@comcast.net>

Sent: Sunday, August 16, 2020 7:39 PM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

jan mik

janmikus@comcast.net

1614 26th Circle

Anacortes, Washington 98221-3879

From: interurban trees <info@email.actionnetwork.org>

Sent: Sunday, August 16, 2020 7:45 PM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please adopt, with amendments, SDCI’s Director’s Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

We have been working on revising Seattle's ailing tree code for over a year now. It needs to be implemented with the guidance of the Seattle Urban Forestry Commission in the near future. In the mean time the Director's Rule 13-2020 with the Forestry Commissions additions with start the process. Please support this measure to prevent the loss of our once famous quality of life here in Seattle!

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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Thank you for protecting our urban forest.

interurban trees

lance_young@yahoo.com

14810 linden ave n

seattle, Washington 98133

From: Patty Young <info@email.actionnetwork.org>
Sent: Sunday, August 16, 2020 7:53 PM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Keep Seattle Livable!

CAUTION: External Email

Sandra Pinto de Bader,

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

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

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

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

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

Patty Young

pypfeifer@gmail.com

14810 Linden Ave N

Shoreline, Washington 98133

From: lance young <info@email.actionnetwork.org>

Sent: Sunday, August 16, 2020 7:54 PM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

Sandra Pinto de Bader,

The heat island affect of urban environments is particularly evident on days like this (98 fahrenheit). Our trees help to reduce this effect in studies showing that a small 4 meter (13 foot) tree can provide as as much cooling effects as two small air conditioners, and it does this for free! Please support this measure and preserve our environment

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lance young

lance_young@yahoo.com

14810 linden ave n

Seattle, Washington 98133

From: Chuck Dolan <info@email.actionnetwork.org>
Sent: Sunday, August 16, 2020 7:59 PM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

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Trees protection is needed in the face of climate change and the City's Green Stormwater Infrastructure goals.

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- Add “Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages.”
- Add “All replacement trees regardless of size are protected trees and can’t be removed.”
- SECTION 2. Change the heading to “TREE PROTECTION”. Remove references to “Exceptional Trees” only and change to “Trees”. e.g., change “Exceptional Tree Protection Areas” to “Tree Protection Areas”.
- SECTION 4. Add “The Director shall have the authority to allow replacement trees on both public and private property to meet the goals and objectives of race and social justice under Seattle’s Equity and Environment Initiative.”

- Under SMC 25.11.090 the Director has the authority to require “one or more trees” to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.
- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats and need to be considered at the beginning of the development process. The language of this SEPA code section should be included in the Director’s Rule to be certain that the code is complied with.
- SECTION 6. SDCI should adopt SDOT’s registration process and requirements to assist Tree Care Providers in complying with city code and regulations. Reduce the number of citations that will remove a Tree Care Provider from being registered with the city to no more than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor’s license to ensure they have workers’ compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

Chuck Dolan

chucklesd2@hotmail.com

1220 NE 97th St

Seattle, Washington 98115

From: Kevin Murphy <info@email.actionnetwork.org>

Sent: Sunday, August 16, 2020 8:25 PM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please adopt, with amendments, SDCI’s Director’s Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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.

Kevin Murphy

kemurphy1972@hotmail.com

526 30th ave east

Seattle, Washington 98112

From: Cynthia Rose <info@email.actionnetwork.org>

Sent: Sunday, August 16, 2020 8:41 PM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per

SMC 25.11.090

- Tightening tree removal requirements for exceptional trees as hazard trees

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

- Change Subject Title to remove words "land division" and replace with "Development"
- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."
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- SECTION 6. SDCI should adopt SDOT's registration process and requirements to assist Tree Care Providers in complying with city code and regulations. Reduce the number of citations that will remove a Tree Care Provider from being registered with the city to no more than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor's license to ensure they have workers' compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

Cynthia Rose

crose1453@gmail.com

11557 23rd Ave NE

Seattle , Washington 98125

From: Karen Gadwell <info@email.actionnetwork.org>

Sent: Sunday, August 16, 2020 8:52 PM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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Thank you for protecting our urban forest.

Karen Gadwell

kgadwell@gmail.com

Seattle

WA, Washington 98125

From: June BlueSpruce <info@email.actionnetwork.org>
Sent: Sunday, August 16, 2020 9:08 PM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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Thank you for protecting our urban forest.

Sincerely yours,
June BlueSpruce
Columbia City - District 2

June BlueSpruce
jbluespruce@gmail.com
5008 44th Ave S
Seattle, Washington 98118-2308

From: Bruce Sarvis <info@email.actionnetwork.org>
Sent: Sunday, August 16, 2020 9:09 PM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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Thank you for protecting our urban forest.

Bruce Sarvis

brucesarvis@hotmail.com

4009 Northeast 115th Street

Seattle, Washington 98125

From: Tracy Tardiff <info@email.actionnetwork.org>

Sent: Sunday, August 16, 2020 9:16 PM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

I am writing because the tree canopy is very important to me. This tree protection rule is overdue. You simply cannot put a price on trees. They are a priceless resource to be protected and managed,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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Require that Tree Care Provider companies have a WA State contractor's license to ensure they have workers' compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

Tracy Tardiff

tctardiff@icloud.com

2603 NE 137th St.

Seattle, Washington 98125

From: Lynn Fitz-Hugh <lynn.fitzhugh@earthlink.net>

Sent: Sunday, August 16, 2020 9:22 PM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

I have been working for 3 years with a succession of city council members all of whom no longer hold office on trying to get a new tree ordinance passed. It is so LONG over due to have this passed that it is outrageous that Master builders who said not a peep in that whole time would not try to stop this! We already have seen so, so many trees lost in the last 5 years of development of Seattle. If we don't act soon the horse will really be already out of the barn in a way that will make our name "the Emerald city" a joke.

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches. A 24 inch tree sequesters and stores a lot of carbon! It is older than you. It deserves to live.
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process. We have to do this to meet our canopy goals
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires. They need to more than register. They need to sign a statement that they have read and will abide by these rules, or lose their tree cutting license.
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees. This is so helpful because people have been playing with this requirement.

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

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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."
- Add "Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages." This is very important we will not meet our tree canopy goals otherwise.

- Add “All replacement trees regardless of size are protected trees and can’t be removed.” If this is not in their you render meaningless the idea of replacement tree.
- SECTION 2. Change the heading to “TREE PROTECTION”. Remove references to “Exceptional Trees” only and change to “Trees”. e.g., change “Exceptional Tree Protection Areas” to “Tree Protection Areas”.
- SECTION 4. Add “The Director shall have the authority to allow replacement trees on both public and private property to meet the goals and objectives of race and social justice under Seattle’s Equity and Environment Initiative.”
- Under SMC 25.11.090 the Director has the authority to require “one or more trees” to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.
- 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.

Lynn Fitz-Hugh

lynn.fitzhugh@earthlink.net

12341 - 35th Ave NE #305
Seattle, Washington 98125

From: invader.gz@everyactioncustom.com <invader.gz@everyactioncustom.com>
Sent: Sunday, August 16, 2020 9:26 PM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

I support the Urban Forestry Commission's recommendations on the Draft Directors rules under consideration.

Sincerely,
Grace Zandt
5963 Rainier Ave S Seattle, WA 98118-2763 invader.gz@gmail.com

From: Cleo Faraone <cleofaraone@comcast.net>
Sent: Sunday, August 16, 2020 9:27 PM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees

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

- Change Subject Title to remove words "land division" and replace with "Development"
- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."
- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as "a group of 3 or more significant trees with overlapping or touching crowns." Include street trees in groves.
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Thank you for protecting our urban forest.

Cleo Faraone

cleofaraone@comcast.net

521 NE 88th St

Seattle, Washington 98115

From: Martha Pruitt <info@email.actionnetwork.org>

Sent: Sunday, August 16, 2020 9:37 PM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please adopt, with amendments, SDCI’s Director’s Rule 13-2020

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

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

- Change Subject Title to remove words "land division" and replace with "Development"
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Thank you for protecting our urban forest.

Martha Pruitt

harleyquin206@gmail.com

814 S Rose St

Seattle , Washington 98108

From: Jalair Box <info@email.actionnetwork.org>

Sent: Sunday, August 16, 2020 10:08 PM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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".

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Thank you for protecting our urban forest.

Jalair Box

jalairbox@gmail.com

5450 Leary Ave NW, Apt 240

Seattle, Washington 98107

From: Adrianna Culver <info@email.actionnetwork.org>

Sent: Sunday, August 16, 2020 10:31 PM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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.

Adrianna Culver

adrianna.culver@gmail.com

10033 Interlake Ave N
Seattle, Washington 98133

From: kevin orme <info@email.actionnetwork.org>
Sent: Sunday, August 16, 2020 10:37 PM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

to the City of Seattle, Department of Construction and Inspections -

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, ****most definitely including**** tree service provider requirements.

Seattle must move forward NOW. This process of increasing protection for our urban forest was first proposed by the Seattle City Council over 11 years ago and is long overdue. The additional almost TWO MORE YEAR DELAY being sought by the Master Builders and similar groups is simply unacceptable! Our urban forest climate crisis is already well underway - such a delay would simply mean we'd have this same conversation two years from now and they'd be asking for two more years' delay, and so on. Stop this endless procrastination and adopt the updated rule with the amendments suggested below, PLEASE!

It's definitely worth pointing out the following updates in the new draft Director's Rule are great steps forward - thanks for adding them! - to wit:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as ****protected trees****, at the start of the platting and short platting process - this definitely helps avoid them getting cut down early on and

then 'oh well'.....

- Requiring Tree Care Providers to register with the City, the same way SDOT already does and has done for a long time;
- **Continuing protection of tree groves as exceptional trees**, even if a tree is removed from the grove
- Making clear that **all exceptional trees removed** during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees

However, it's also true that these next set of changes are absolutely needed to abide by earlier executive orders as well as the intent of the Tree Ordinance itself (protecting Seattle's urban canopy):

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

- Please change the Subject Title to remove the words "land division" and replace them with "Development"
- **PURPOSE AND BACKGROUND.** add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."
- Also add the statement "The purpose of this Director's Rule is to protect and enhance the urban tree canopy of Seattle. Protecting Seattle's urban trees has been shown to have the support of the Citizens of Seattle multiple times over publicly and we hereby acknowledge and honor that intent with this updated Director's Rule.
- **SECTION 1.** Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as "a group of 3 or more significant trees with overlapping or touching crowns." Include street trees in groves.
- Add "Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to

maintain a diversity of tree species and ages.”

- Add “All replacement trees regardless of size are protected trees and can’t be removed.”
- SECTION 2. Change the heading to “TREE PROTECTION”. Remove references to “Exceptional Trees” only and change to “Trees”. e.g., change “Exceptional Tree Protection Areas” to “Tree Protection Areas”.
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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 *absolutely also* rise in direct proportion to the size of the removed tree. The city cannot wait 80 years to replace an 80-year-old western red cedar tree or similar Douglas Fir, Maple or other exceptional tree and expect to maintain any realistic or science-backed canopy goals when these large exceptional trees keep getting removed during development.

Nor is replacement simply enough - it assumes the stewardship of replacement trees will actually be sufficiently funded, that it will consistently and effectively be managed over the several early years needed to ensure new trees survive. Finally, the carbon capture and environmental services these large exceptional trees perform INCREASE over their long lifespan, a scientific fact. Continually allowing them to be removed and 'maybe' replaced is simply irresponsible and serves short term greed, not long-term climate, habitat and canopy goals for urban Seattle.

- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats and need to be considered at the beginning of the development process. The language of this SEPA code section should be included in the Director’s Rule to be certain that the code is complied with.

- SECTION 6. SDCI should adopt SDOT's registration process and requirements to assist Tree Care Providers in complying with city code and regulations.
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- Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor's license to ensure they have workers' compensation.
- Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued.
- Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done, documented IN ADVANCE of any tree-related activity, period.

Thank you for protecting our urban forest.

kevin orme

ovaltinelatte@hotmail.com

502 N 80th St

Seattle, Washington 98103

From: Marci Armitstead <armits@comcast.net>

Sent: Sunday, August 16, 2020 11:02 PM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division,

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Thank you for protecting our urban forest.

Marci Armitstead

armits@comcast.net

419 McGraw
Seattle, Washington 98109

From: Steven Ramos <info@email.actionnetwork.org>
Sent: Sunday, August 16, 2020 11:16 PM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

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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.

Steven Ramos

stevencreative@gmail.com

4229 BROOKLYN AVE NE Apt 4
SEATTLE, Washington 98105

From: Susan Fried <info@email.actionnetwork.org>
Sent: Sunday, August 16, 2020 11:21 PM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection

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

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
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- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees

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

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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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People in places with more trees are healthier and live longer.

Thank you for protecting our urban forest.

Susan Fried

s45fried@yahoo.com

3020 NE 113th St

Seattle, Washington 98125

From: Robert Jellinek <info@email.actionnetwork.org>
Sent: Monday, August 17, 2020 12:03 AM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

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Thank you for protecting our urban forest.

Robert Jellinek

robert.jellinek@gmail.com

824a s orcas st

Seattle, Washington 98108

From: Erika Nedderman <info@email.actionnetwork.org>

Sent: Monday, August 17, 2020 12:11 AM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

Erika Nedderman

Enedderman@gmail.com

7313 17th Avenue Northwest

Seattle, Washington 98117

From: Susan Ward <barrettmw@msn.com>

Sent: Monday, August 17, 2020 12:48 AM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

I urge you to pass, very soon, a new "tree code" which will protect and increase our tree canopy; which will protect the large and mature trees of our city. This is vital to the health and well-being of all our citizens. Our new tree code must take into account the value of trees to Seattle's air and water, to cooler summer temperatures, to preventing run-off into our shared drainage/sewer system and preventing erosion of our hills, and to promoting tranquility and peace of mind in our neighborhoods.

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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Thank you for protecting our urban forest.

Susan Ward

Susan Ward

barrettmw@msn.com

10330 Wallingford N

Seattle, Washington 98133

From: Marsha Adams <adams_marsha@fastmail.fm>
Sent: Monday, August 17, 2020 2:02 AM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please Strengthen Seattle's Tree Ordinance

CAUTION: External Email

Sandra Pinto de Bader,

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

Seattle's rapid growth and an outdated tree ordinance are reducing these beneficial effects as trees are removed and not replaced. It is urgent to act now to stop this continued loss of

trees, particularly large mature trees and tree groves. It is important to promote environmental equity as trees are replaced.

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

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

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

Marsha Adams

adams_marsha@fastmail.fm

1715 SE Mason St Apt A

Shelton, Washington 98584

From: Jesun Firoz <info@email.actionnetwork.org>
Sent: Monday, August 17, 2020 3:28 AM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

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Jesun Firoz

jesunsahariar@gmail.com

2700 NE 125TH ST APT 402

Seattle, Washington 98125

From: Holly Delaney <info@email.actionnetwork.org>
Sent: Monday, August 17, 2020 6:05 AM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

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Holly Delaney

hollyjdelaney@gmail.com

7548 Sunnyside Ave N

Seattle, Washington 98103

From: Caroline Thompson <info@email.actionnetwork.org>

Sent: Monday, August 17, 2020 6:27 AM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

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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.

Within the last year our street lost some incredibly old and beautiful trees to a property developer who has cleared his property. This included the loss of trees that were more than

30" in diameter. If we are a city that really cares about climate change and a livable environment, we need to start implementing and enforcing regulations that make that a reality.

Thank you for protecting our urban forest.

Caroline Thompson

CThomp1603@gmail.com

10302 14th Avenue NW

Seattle, Washington 98177

From: lisa_a_valdez@everyactioncustom.com <lisa_a_valdez@everyactioncustom.com>
Sent: Monday, August 17, 2020 7:06 AM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

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

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

The proposed rule can be strengthened in the following ways:

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

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

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

Sincerely,
 Lisa Valdez
 2907 Montlake Blvd E Seattle, WA 98112-2017 lisa_a_valdez@yahoo.com

From: Joanne Moring <joiemoring@comcast.net>
Sent: Monday, August 17, 2020 7:13 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.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees

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

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Thank you for protecting our urban forest.

Joanne Moring

joiemoring@comcast.net

1011 N 38th St

Seattle, Washington 98103

From: Jack Dunnington <info@email.actionnetwork.org>
Sent: Monday, August 17, 2020 7:21 AM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

Jack Dunnington

jdunnington94@gmail.com

7814 39th Ave SW

Seattle, Washington 98136

From: Analia Bertoni <info@email.actionnetwork.org>

Sent: Monday, August 17, 2020 8:01 AM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

Analia Bertoni

analiachi@yahoo.com

821 South Thistle Street

Seattle, Washington 98108

From: Andra Bell <mcbell@seanet.com>

Sent: Monday, August 17, 2020 8:02 AM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

Yes, I'm signing on to the prewritten form letter, because there is no need to reinvent the wheel here. We must start protecting our tree canopy in Seattle and beyond. It is tragic what City Light does to the trees anyway, all in the name of keeping power lines clear...the V cut is a tragedy. Seriously? We can't start putting utilities underground? In the mean time, at least we can keep the big trees that exist on public and private land. So.

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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Thank you for protecting our urban forest.

Sincerely,
Andra Bell
Seattle

Andra Bell
mcbell@seanet.com
740 N 68th St
Seattle, Washington 98103

From: Joyce Moty <info@email.actionnetwork.org>
Sent: Monday, August 17, 2020 8:17 AM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please Protect Seattle's Trees

CAUTION: External Email

Sandra Pinto de Bader,

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

Seattle's rapid growth and an outdated tree ordinance are reducing these beneficial effects as trees are removed and not replaced. It is urgent to act now to stop this continued loss of

trees, particularly large mature trees and tree groves. It is important to promote environmental equity as trees are replaced.

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

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

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

Joyce Moty

jmmoty@gmail.com

1531 30th Ave. S.

Seattle, Washington 98144

From: Kevin Judson <cinetica@spanishcaravan.com>
Sent: Monday, August 17, 2020 8:42 AM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

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Thank you for protecting our urban forest.

Kevin Judson

cinetica@spanishcaravan.com

7544 Sunnyside Ave N

Seattle, Washington 98103

From: Sandra Lipo <info@email.actionnetwork.org>
Sent: Monday, August 17, 2020 8:45 AM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

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- Add "Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages."
- Add "All replacement trees regardless of size are protected trees and can't be removed."
- SECTION 2. Change the heading to "TREE PROTECTION". Remove references to "Exceptional Trees" only and change to "Trees". e.g., change "Exceptional Tree Protection Areas" to "Tree Protection Areas".
- SECTION 4. Add "The Director shall have the authority to allow replacement trees on both public and private property to meet the goals and objectives of race and social justice under Seattle's Equity and Environment Initiative."
- Under SMC 25.11.090 the Director has the authority to require "one or more trees" to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve

equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.

- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats and need to be considered at the beginning of the development process. The language of this SEPA code section should be included in the Director's Rule to be certain that the code is complied with.

- SECTION 6. SDCI should adopt SDOT's registration process and requirements to assist Tree Care Providers in complying with city code and regulations. Reduce the number of citations that will remove a Tree Care Provider from being registered with the city to no more than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor's license to ensure they have workers' compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

Sandra Lipo

lipo.sandra@gmail.com

3712 W Prosper St

Seattle, Washington 98199

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

Sent: Monday, August 17, 2020 8:52 AM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

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

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

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

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

The proposed rule can be strengthened in the following ways:

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

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

Sincerely,

Lassie Webster
2727 NE 91st St Seattle, WA 98115-3467
lassiewebster@gmail.com

From: Margaret Martin <info@email.actionnetwork.org>

Sent: Monday, August 17, 2020 8:54 AM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- 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.
- 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.

Margaret Martin

billybobmarg@yahoo.com

1024 NE 127th St

Seattle, Washington 98125-4006

From: Martha Baskin <mobaskin@earthlink.net>

Sent: Monday, August 17, 2020 8:54 AM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by the Master Builders Association, among others in adopting this updated Director's Rule with the amendments proposed below.

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

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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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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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.

Martha Baskin

mobaskin@earthlink.net

7534 17th Avenue NW, #B

Seattle, Washington 98117

From: Timothy Colman <info@email.actionnetwork.org>

Sent: Monday, August 17, 2020 9:05 AM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

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
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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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- 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.

We ought to plant trees that live 1000 years, call that profit.

Timothy Colman

calmspot@gmail.com

6521 23RD AVE NE

Seattle, Washington 98115

From: Denise Mahnke <wnps@wnps.org>

Sent: Monday, August 17, 2020 9:30 AM

To: SCI_DRulesComments <SCI_DRulesComments@seattle.gov>

Cc: Durkan, Jenny <Jenny.Durkan@seattle.gov>; LEG_CouncilMembers <council@seattle.gov>; Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: SDCI Director's Rule 13-2020 Designation of Exceptional and Significant Trees

CAUTION: External Email

Hello;

Please accept this public comment letter from the Washington Native Plant Society for review during the public comment period.

Thank you.

Respectfully,

Denise Mahnke

WNPS Business Manager

Washington Native Plant Society

6310 74th St.; Ste. 215E

Seattle, WA 98115

(206)527-3210

To promote the appreciation and conservation of Washington's native plants and their habitats through study, educations, and advocacy.



Washington Native Plant Society
Appreciate, Conserve, and Study Our Native Flora

6310 NE 74th St., Ste 215E, Seattle, Washington 98115
(206) 527-3210

August 17, 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 the Washington Native Plant Society (WNPS), thank you for your work to update the SDCI Director's Rule on exceptional trees and expanding it to cover significant trees, tree protection, retention, and tree removal during land division, including tree service provider requirements. **WNPS urges you to strengthen the proposed Director's Rule per the recommendations below and to adopt and implement the Rule without delay.**

WNPS promotes the appreciation and conservation of Washington's native plants through study, education, and advocacy. **Seattle's urban forest contains at least three dozen tree species native to Washington state.** From towering Douglas firs to vine maples in the understory, these native trees contribute to the city's unmistakable sense of place, support wildlife, and provide important benefits to the people who live, work, and play in the city.

While the proposed Director's Rule offers improvements for tree protection, it is based on the current, ineffective tree protection ordinance. As WNPS wrote to the Seattle City Council in July of 2019, the City needs an updated tree protection ordinance to slow and reverse tree loss.

A new code will need to include stronger, smarter, and simpler tree protections, including tree removal and replacement permits, a fee-in-lieu payment mechanism, and strong funding for code enforcement. The City also needs oversight and accountability for all urban forestry and tree management decisions in the form of a central Urban Forestry Division, preferably housed at the Office of Sustainability and Environment. And we need more city arborists who have the knowledge and skills to help the City make informed management decisions regarding its critical green infrastructure.

Below are WNPS's specific comments and recommendations regarding DR 13-2020

WNPS Supports the following in proposed Director's Rule 13-2020:

- Reducing the upper threshold on exceptional trees to 24 inches diameter at standard height (DSH) from 30 inches DSH.
- Clarifying the definition of a significant tree.
- Requiring tree care provider registration with the City.
- Acknowledging tree protection and retention starting with the platting process.

- Continuing tree grove protection even if a tree is removed from a grove.
- Acknowledging that exceptional trees removed during development must be replaced under existing SMC 25.11.090.
- Tightening requirements for removal of exceptional trees as hazard trees.
- Expanding the scope of the Director's Rule to include more protections and clarity.
- Maintaining lower exceptional tree DSH threshold for slower growing or typically smaller stature Pacific Northwest native trees, such as Gary Oak, Madrona, and Pacific Yew.
- Implementing a worksheet to track tree loss and replacement on private property, knowing that the collected data will be digitized and compiled in a publicly accessible database.

WNPS recommends strengthening the proposed Director's Rule in the following ways:

GLOBAL COMMENT

To fulfil the purpose and intent of existing land use and tree protection codes, as well as to achieve the environmental goals set in the Seattle 2035 Comprehensive Plan, the City must maximize retention of exceptional trees AND trees at least six inches in diameter (SMC 23.22, SMC 25.11.010, 2035 Seattle Comprehensive Plan EN 1.1 & EN 1.2). Maximizing tree retention must be the goal during land division AND throughout any subsequent development on all lots in all zones across the city. The proposed Rule as written does not communicate this and seems to imply that maximizing tree retention is limited to exceptional trees during platting.

Please review and revise the rule accordingly. In addition, WNPS recommends that new text be added to the fourth paragraph of the Purpose and Background section so that it reads: "Applicants shall protect and retain significant and exceptional trees as required per Chapter 25.11 and as further clarified in this Rule. In addition, removal of any stem, root or other tree part on an existing exceptional tree is prohibited unless that action specifically responds to an adopted SMC requirement applicable only when new development is proposed. To meet Seattle's 2035 Comprehensive Plan goals and fulfill the purpose and intent of SMC 23.22 and SMC 25.11, all development projects in all zones across the city shall be designed to maximize the retention of existing trees six inches DSH and larger."

SECTION 1: DEFINITIONS

1. *Trees not considered exceptional, first bullet point:* In this paragraph, the proposed rule excludes trees that "have defects or damage that now or in the foreseeable future will result in increased poor health condition and/or limited life expectancy." This language is so vague and general that one could argue it applies to nearly any tree in an urban environment. Please clarify to avoid a loose definition that would result in the over-identification of hazard trees. Additionally, recognize and emphasize that trees with defects or damage are typically highest value wildlife trees and should be protected unless they meet the removal requirements of section 3.1.
2. *Trees not considered exceptional, second bullet point:* Please protect native trees. WNPS asks that the categorical exclusion of red alders, black cottonwoods, and bitter cherries from exceptional tree status be removed. These native species contribute importantly to our urban ecology. Following the "right tree, right place" philosophy, red alders, black cottonwoods, and bitter cherries can safely thrive and deserve protections.

3. *Tree groves*: Please revise the definition of tree groves. Requiring grove trees to have a DSH of at least twelve inches is inconsistent with protections for significant trees and adds unnecessary complexity to the Rule. WNPS also recommends reducing the number of trees required to meet the definition of a grove. Neighboring cities of Kirkland, Duvall, and Woodinville require just three trees six inches DSH or greater with contiguous canopy to be protected as a grove. WNPS further recommends removing the exclusion of street trees from tree groves. Street trees are no different from trees located across property lines on adjacent lots and there is no ecologic basis to exclude them. Any smaller trees and/or vegetation (excluding any species on the noxious weed list) within the grove should be protected as well.

SECTION 2: EXCEPTIONAL TREE PROTECTION.

1. Please remove "EXCEPTIONAL" from section heading. The section applies to all trees greater than six inches DSH.
2. *Section 2.1. Exceptional Trees During Platting*. Please remove "Exceptional" from subsection heading. The platting rules apply to all trees six inches DSH and larger.
3. *Section 2.2. Allowable Encroachment in Exceptional Tree Protection Areas During Proposed Development*. Again, please remove "Exceptional" from subsection heading. The rule applies to all trees retained during development.
4. *Section 2.3. Tree Groves*. Tree grove protections could be improved by also protecting smaller trees, shrubs and ground cover that may exist in a grove's understory, particularly native species.

SECTION 3: EXCEPTIONAL TREE REMOVAL

1. *Section 3.1. Tree Risk Assessment Required for Tree Removal. Second paragraph*. Please add a requirement for the applicant to post a public notice of hazard tree removal. For example, "This application will require the applicant to submit both an arborist report, a tree risk assessment, and display a public notice at the development site and online for at least 14 days before the tree can be removed." This ensures that neighbors will know when and where legal tree removal is occurring. This should be required for all exceptional trees that SDCI permits for removal and replacement.
2. *Section 3.1. Tree Risk Assessment Required for Tree Removal. Third paragraph and associated bulleted list*: A Tree Risk Assessment Qualified (TRAQ) tree service provider will understand the evaluative criteria established by the International Society of Arboriculture (ISA). The bulleted list attempts to condense too much into too short a space and risks adding confusion for property owners. Please remove the bulleted list all together and revise paragraph 3 to read: "The tree risk assessment must conclude that the exceptional tree is a "high" risk hazard using the tree risk assessment methodology and criteria established by the International Society of Arboriculture and that the risk cannot be mitigated by pruning, cabling, bracing or other methods that would preserve the tree."
3. *Section 3.1. Tree Risk Assessment Required for Tree Removal. Fourth paragraph*. Please revise definition of "qualified professional" for clarity. It is unclear what "three years' experience in tree evaluation" means. Candidates for ISA Tree Risk Assessment Qualification must already have three years of full-time experience in arboriculture or a combination of education and practical experience. Does a "qualified professional" per DR 13-2020 require an additional three years' experience? What exactly does "tree evaluation" mean? Does that mean performing tree risk assessments?

If so, how would a younger TRAQ certified arborist gain experience if experience is required to receive work in the field?

4. *Section 3.1. Tree Risk Assessment Required for Tree Removal. Fifth paragraph and associated bulleted list. The third bullet point:* “International Society of Arborists” should be “International Society of Arboriculture.” The “and/or” conjunctions obscure the meaning of this bullet point and the education requirements are not clearly connected to arboriculture or forestry. These educational requirements may be redundant anyway, as the ISA Certified Arborist credential has clear experiential and educational requirements for eligibility and maintenance. Further educational requirements by the city may disproportionately impact arborists who may have not had the resources for post-secondary education. If the educational requirements are necessary, the point could be clarified by the following:
 - International Society of Arboriculture (ISA) Certified Arborist with at least one of the following:
 - Associate Degree with at least 2 courses related to arboriculture or urban forestry;
 - Two years of college-level credits with at least 2 courses related to arboriculture or urban forestry; and/or
 - 120 Continuing Education Units relating to tree care.

SECTION 4: REQUIRED MITIGATION FOR ALLOWED TREE REMOVAL

1. *First paragraph:* The first sentence reads “Mitigation is required for each exceptional tree that is not hazardous and is removed in association with development in all zones.” Is mitigation *not* required for trees that are not removed in association with development? Mitigation for removal of exceptional hazard trees ought to be required, too. They were exceptional trees before they became hazardous. WNPS understands that the intent here may be to not burden property owners with the replacement of a tree which was removed through no fault of their own. If the city had a fee-in lieu payment scheme for trees which developers were unable to retain or replace on-site, funds from those coffers could be used to assist property owners with these costs in an equitable way.
2. *First paragraph:* Last sentence ends “...preference for off-site replacement shall be on public property.” This preference may prove restrictive and unhelpful as the city works to meet its racial and social justice goals under Seattle’s Equity and Environment Initiative. The Director should have the authority to allow trees to be planted on private property, especially where areas with low canopy and “Disadvantaged” scores on the Racial and Social Equity Index coincide, and where desired by the property owner. Our suggested revision: “...preference for off-site replacement shall be on public or private property, where desired by the property owner, in order to meet the City’s goals and objectives of racial and social justice under Seattle’s Equity and Environment Initiative.”
3. *Third paragraph:* Need to add a timing requirement. By what time is the applicant required to replace the removed tree? What if the tree is removed at the start of summer? It would seem wisest to wait to plant until autumn. We suggest, “All replacement trees shall be planted in October through December and no later than 12 months after removal. The applicant shall prepare and, if necessary, amend the existing soil conditions...”

4. *Fourth paragraph:* To aid the survival of replacement trees, add that replacement trees shall be watered during summer months for the first 5 years. Our suggestion: “The property owner of the site shall water replacement trees from June through September and ensure that the trees remain healthy for at least five years after planting. The property owner shall allow inspection by the City.”
5. *Table 1. Size and Thresholds for Selected Specimen Exceptional Trees:* A single column header spans two columns and is not easily understood. We suggest revising to two headings and adding notation to indicate native species as below:

Tree Species	DSH at which Species Becomes Exceptional
ALDER, Sitka – <i>Alnus sinuate</i>	6”
APPLE, Orchard (Common) – <i>Malus sp.</i>	20”
ASH, European – <i>Fraxinus excelsior</i>	22”
ASPEN, Quaking – <i>Populus tremuloides*</i>	12”
...	...
...	...

*Native to Washington state.

6. *Table 1. Record for WILLOW species:* All specific epithets, subspecies, and variety names should be lower case, and species varieties should be indicated by “var.” instead of “ver.” The entry should read:

WILLOW (All native species) – <i>Salix sp.</i> (<i>geyeriana</i> var. <i>meleina</i> , <i>eriocephala</i> ssp. <i>mackenzieana</i> , <i>hookeriana</i> , <i>piperi</i> , <i>scouleriana</i> , <i>sitchensis</i>)	8”
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SECTION 5: USE OF THIS RULE IN THE APPLICATION OF SEPA

This section of the proposed Rule seems to imply that SEPA and mitigating measures only apply to exceptional trees that are rare, uncommon or unique, form a wildlife travelway, or if they are of substantial, aesthetic, educational, ecological, or economic value. That is not the case. SEPA protections are much broader. This section should adequately communicate as much.

SEPA protects trees and other vegetation beyond our biggest trees. SMC 25.05.675 N.2.a. states “...A high priority shall be given to the preservation and protection of special habitat types. Special habitat types include, but are not limited to, wetlands and associated areas (such as upland nesting areas), and spawning, feeding or nesting sites.” Age and species diversity in our urban forest is critical for supporting an abundance and diversity of flora and fauna in Seattle. Please revise Section 5 to ensure the applications of SEPA are correctly stated.

SECTION 6: TREE CARE PROVIDER ACKNOWLEDGEMENT

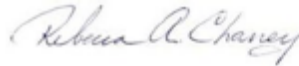
1. The proposed tree care provider acknowledgement would be improved by more closely mirroring SDOT's Tree Service Provider Registration. Consistency between departments will reduce confusion for professionals. Please change the title of the form to "SDCI Tree Service Provider Registration." Please require the following documentation to be included with the registration:
 - Washington State Contractor License (L&I)
 - City of Seattle Business License
 - Certificate of Insurance
 - Street Use Annual Vehicle Permit (if applicable)
2. Registration should not be automatically renewed each year. Please require annual registration to ensure that tree service provider information remains up-to-date and that tree professionals regularly review the code for any updated language or regulations.
3. Please reduce the number of citations during a one-year period before a tree service provider is removed from the City's list to do business from no more than three to no more than two.

Thank you for your work to update the Director's Rule. WNPS urges you to strengthen, adopt, and implement DR 13-2020 without delay. WNPS appreciates the improved tree protections the updated Rule will provide, but we note again that the City needs an updated tree protection ordinance. Please continue working with the Urban Forestry Commission to introduce legislation for City Council's consideration this year.

Respectfully,



Van Bobbitt, President
Washington Native Plant Society



Becky Chaney, Conservation Committee Chair
Washington Native Plant Society



Janka Hobbs, Central Puget Sound Chapter Chair
Washington Native Plant Society

Cc: Mayor Jenny Durkan; Jenny.Durkan@seattle.gov
Seattle City Council; council@seattle.gov
Sandra Pinto de Bader; Sandra.Pinto_de_Bader@seattle.gov

From: Mary Wallon <info@email.actionnetwork.org>
Sent: Monday, August 17, 2020 9:47 AM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without delay in adopting this updated Director's Rule with the amendments proposed below. This process protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
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- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees

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

- Change Subject Title to remove words "land division" and replace with "Development"
- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."
- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as "a group of 3 or more significant trees with overlapping or touching crowns." Include street trees in groves.
- Add "Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects

must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages.”

- Add “All replacement trees regardless of size are protected trees and can’t be removed.”
- SECTION 2. Change the heading to “TREE PROTECTION”. Remove references to “Exceptional Trees” only and change to “Trees”. e.g., change “Exceptional Tree Protection Areas” to “Tree Protection Areas”.
- SECTION 4. Add “The Director shall have the authority to allow replacement trees on both public and private property to meet the goals and objectives of race and social justice under Seattle’s Equity and Environment Initiative.”
- Under SMC 25.11.090 the Director has the authority to require “one or more trees” to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.
- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats and need to be considered at the beginning of the development process. The language of this SEPA code section should be included in the Director’s Rule to be certain that the code is complied with.
- SECTION 6. SDCI should adopt SDOT’s registration process and requirements to assist Tree Care Providers in complying with city code and regulations. Reduce the number of citations that will remove a Tree Care Provider from being registered with the city to no more than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor’s license to ensure they have workers’ compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Thank you for protecting our urban forest.

Mary Wallon

mwallon21@gmail.com

9 West Armour Street

Seattle, Washington 98119

From: Wallis Bolz <info@email.actionnetwork.org>

Sent: Monday, August 17, 2020 9:47 AM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

Wallis Bolz, Green Seattle forest steward and Madison Valley resident

Wallis Bolz

wallisbolz@gmail.com

2642 E Ward St

Seattle, Washington 98112

From: Erika Langley <erika@drizzle.com>
Sent: Monday, August 17, 2020 9:52 AM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

This should be a no-brainer. Heritage trees are irreplaceable. This is a classic example of Seattle's sacrificing the beauty and tradition of the city for greed and development. It is shameful.

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Thank you for protecting our urban forest.

Erika Langley

erika@drizzle.com

1708 Nipsic Avenue

Bremerton , Washington 98310

From: Marjorie Cogan <marjiocogan@bethshalomseattle.org>
Sent: Monday, August 17, 2020 10:09 AM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

Marjorie Cogan

marjiecogan@bethshalomseattle.org

6800 35th Ave NE, Congregation Beth Shalom

Seattle, Washington 98115

From: Lon Kissinger <info@email.actionnetwork.org>
Sent: Monday, August 17, 2020 10:14 AM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please Update Seattle's Tree Ordinance

CAUTION: External Email

Sandra Pinto de Bader,

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

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

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

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

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

Lon Kissinger

lkissea@gmail.com

3615 CARR PL N

Seattle, Washington 98103

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

Sent: Monday, August 17, 2020 10:30 AM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Parks' Tree Protection Violations

CAUTION: External Email

Please post this to Urban Forestry.

What of the proposed changes address the different city departments' abuse of Tree Regulations with apparently zero enforcement possibilities with inter departments involved such as SDOT, DCI and Parks playing 'pass the buck' as shown here? Virtually all departments are involved.

August 13, 2020

Dear,

Seattle Parks and Recreation (SPR) is committed to adhering to Seattle's environmental codes for environmentally critical areas, and appreciate your sharing your concerns that the Orchard Street Ravine house demolition is failing to adhere to the ECAs.

Redi Karameto is working with the demolition contractor and with staff from SPR, SDCI, and Green Seattle Partnership to respond to the concerns you raise.

PLANTINGS—As Redi explained when you spoke by phone on August 7, in addition to the hydroseeding noted on the drawings, we will also plant a variety of vegetation to restore the ravine. The plant list was created by Green Seattle Partnership, who support SPR to maintain this ravine.

TREE PROTECTION—On August 10, Redi met onsite with the contractor, SPR arborist Mark Malone, and SDCI inspector Joe Eckhoff. Redi directed the contractor to stop work until they had reinstalled the tree-protection fence and provided a water sprinkler for the remainder of the demolition.

When Mark Malone inspected the tree for possible damage from the lumber that entered the tree-protection zone, he found no damage to the tree. Mark directed Redi to have the contractor reinstall the tree-protection fence and avoid the critical root zone.

Joe Eckhoff observed that the field changes, requested by the contractor to address field demolition access challenges, should have been routed through SDCI. We will update the drawings to show the field changes, and add the tree and plants information to update SDCI records. Joe also directed that the tree-protection fence be set in place, and a water sprinkler provided for the demolition.

Redi can provide you with updated drawings as soon as those are available.

SDCI FOLLOW-UP—We have been in touch with SDCI's Valerie Patton about your concerns, and she has followed up with SDCI reviewers and the Site Development Inspector. Her understanding is that SDCI normally does not deal with potential tree code violations on SPR property, but because the SDCI-issued permit required tree protection which apparently was not maintained, she plans to open a case and request an arborist report to determine whether tree protection was reestablished, whether there was tree damage, and what SPR is doing, going forward, to prevent damage. Val will follow up with SDCI review staff to verify whether a revision is required, and she will contact you about your concerns.

Thank you for strong commitment to protecting Seattle's environmentally critical areas. Please be assured that we share your commitment.

Sincerely,

Jesús Aguirre

Superintendent, Seattle Parks and Recreation

cc: Joe Eckhoff, Inspector, Seattle Department of Construction and Inspections

Dan Enrico, Construction Manager, Seattle Parks and Recreation

Redi Karameto, Senior Architect, Seattle Parks and Recreation

Mark Malone, Arborist, Seattle Parks and Recreation

Valerie Patton, Inspection Support Analyst, Seattle Department of Construction and Inspections

Andy Sheffer, Planning and Development Director, Seattle Parks and Recreation

Scott Stevens, Park Engineer, Seattle Parks and Recreation

From: Louise Fox <info@email.actionnetwork.org>

Sent: Monday, August 17, 2020 10:31 AM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

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Thank you for protecting our urban forest.

Louise Fox

louise.s.fox@gmail.com

4220 Ne 125th St

Seattle, Washington 98125-4636

From: Scott Granlund <info@email.actionnetwork.org>
Sent: Monday, August 17, 2020 10:38 AM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

Less is not more. I believe the general consensus is that on the whole we need more trees on this planet. Times are changing, the climate is changing, and some will suffer greatly because

of this change. On the small local level we can make decisions that will be for the greater good. Keeping trees, building our number of trees are all aspects of positive growth. Of course a heavily diseased and otherwise rotten trees are another matter. In order to keep trees and not bow to development interests (\$\$) that have the opposite plan, we need laws.

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overlapping or touching crowns.” Include street trees in groves.

- Add “Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages.”
- 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.

Scott Granlund

sgranlund@gmail.com

8612 Wabash Ave. S.

Seattle, Washington 98118

From: Diana Gardiner <info@email.actionnetwork.org>
Sent: Monday, August 17, 2020 10:47 AM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the

grove

- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090

- Tightening tree removal requirements for exceptional trees as hazard trees

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

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Thank you for protecting our urban forest.

Please act swiftly with no more delay, our Ballard trees come down every day with little to no repercussions.

Diana Gardiner

diana.shurtlieff@gmail.com

3023 NW 63rd St

Seattle, Washington 98107

From: macintosh.chat@everyactioncustom.com <macintosh.chat@everyactioncustom.com>

Sent: Monday, August 17, 2020 10:55 AM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

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

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

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

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

The proposed rule can be strengthened in the following ways:

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

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

Sincerely,

Karen Larson Ph.D.

750 Belmont Ave E Apt 14 Seattle, WA 98102-5986 macintosh.chat@gmail.com

From: William Wellborn <mwellborn@earthlink.net>
Sent: Monday, August 17, 2020 10:56 AM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Tree Protection!

CAUTION: External Email

Sandra Pinto de Bader,

One of the key factors that brought me to Seattle, and keeps me here, has been the tree cover. Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

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

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Thank you for protecting our urban forest.

William Wellborn

mwellborn@earthlink.net

6535 21st Ave SW

Seattle , Washington 98106

From: Lisa Bellerio <info@email.actionnetwork.org>
Sent: Monday, August 17, 2020 11:06 AM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

Lisa Bellerio

lisabellerio@gmail.com

2513 Perkins Lane West

Seattle , Puerto Rico 981@9

From: Michele Leonard <savethetrees@live.com>
Sent: Monday, August 17, 2020 11:20 AM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

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Simply put: Save trees with protective legislation NOW,. This has been "studied" for years,. The developers keep getting delays and the city keeps losing trees. What color do you want your sky...developer yellow or tree blue?

Thank you for protecting our urban forest.

Michele Leonard

savethetrees@live.com

13502 Ashworth Ave n

Seattle, Washington 98133

From: Nancy Fasoldt <info@email.actionnetwork.org>
Sent: Monday, August 17, 2020 11:27 AM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

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Thank you for protecting our urban forest.

Nancy Fasoldt

fasoldtgardens@gmail.com

345 NW 47th St

Seattle, Washington 98107

From: John Barber <barber-osa@comcast.net>

Sent: Monday, August 17, 2020 11:37 AM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

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John Barber

barber-osa@comcast.net

3421 East Superior Street

Seattle, Washington 98122-6557

From: Victoria Nelson <johnvick@comcast.net>

Sent: Monday, August 17, 2020 11:41 AM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

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
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SMC 25.11.090

- Tightening tree removal requirements for exceptional trees as hazard trees

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

- Change Subject Title to remove words "land division" and replace with "Development"
- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."
- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as "a group of 3 or more significant trees with overlapping or touching crowns." Include street trees in groves.
- Add "Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages."
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- SECTION 2. Change the heading to "TREE PROTECTION". Remove references to "Exceptional Trees" only and change to "Trees". e.g., change "Exceptional Tree Protection Areas" to "Tree Protection Areas".
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- Under SMC 25.11.090 the Director has the authority to require "one or more trees" to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.
- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats and need to be considered at the beginning of the development process. The language of this

SEPA code section should be included in the Director's Rule to be certain that the code is complied with.

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Thank you for protecting our urban forest.

Victoria Nelson

johnvick@comcast.net

4502 SW Trenton St.

Seattle, Washington 98136

From: Ejayanti12@everyactioncustom.com <Ejayanti12@everyactioncustom.com>
Sent: Monday, August 17, 2020 11:52 AM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

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

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

The proposed rule can be strengthened in the following ways:

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

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

Sincerely,
 Ella Stockman
 5026 SW Admiral Way Seattle, WA 98116-2315 Ejayanti12@gmail.com

From: John Bito <jwb.dontclearcutseattle@ballardview.com>
Sent: Monday, August 17, 2020 11:55 AM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

John Bito

jwb.dontclearcutseattle@ballardview.com

220 NW 58 St
Seattle, Washington 98107

From: kaichenhaun@everyactioncustom.com <kaichenhaun@everyactioncustom.com>
Sent: Monday, August 17, 2020 11:56 AM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

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Sincerely,
 Kai Chenhaun
 2236 Prescott Ave SW Seattle, WA 98126-2039 kaichenhaun@gmail.com

From: John McNulty <info@email.actionnetwork.org>
Sent: Monday, August 17, 2020 11:59 AM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

John McNulty

johnm4502@gmail.com

4502 SW TRENTON

SEATTLE, Washington 98136

From: Rachael Enderle <info@email.actionnetwork.org>
Sent: Monday, August 17, 2020 12:08 PM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

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Thank you for protecting our urban forest!

Rachael

Rachael Enderle

r.kenney@gmail.com

7721 31st Ave NE

Seattle, Washington 98115

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

Sent: Monday, August 17, 2020 12:09 PM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

Catherine Endicott

cendicott2011@gmail.com

2812 NW 85TH ST, UNIT a

SEATTLE, Washington 98117

From: Meredith Regal <info@email.actionnetwork.org>

Sent: Monday, August 17, 2020 12:16 PM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

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Thank you for protecting our urban forest.

Meredith Regal

regalmeredith@gmail.com

6118 21st Avenue Northeast
Seattle , Washington 98115

From: Dixie Edwards <dixie@watershedgardenworks.com>
Sent: Monday, August 17, 2020 12:20 PM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

Trees are natural air conditioners. We must protect large trees for all the benefits they offer. Larger trees make a more pleasant place to live. They add value to communities. Protect them.

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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.

Dixie Edwards

dixie@watershedgardenworks.com

2039 44th Ave.

Longview, Washington 98632

From: Susan Helf <info@email.actionnetwork.org>
Sent: Monday, August 17, 2020 12:21 PM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division,

including tree service provider requirements.

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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- 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.
- 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.

Susan Helf

shelf30@gmail.com

8501 12th Ave. NW, Unit 208
Seattle, Washington 98117

From: David Moehring <dmoehring@consultant.com>
Sent: Monday, August 17, 2020 12:22 PM
To: PRC <PRC@seattle.gov>
Cc: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>; treepac_seattlelists.riseup.net <treepac_seattle@lists.riseup.net>; gigisteven@gmail.com; Whitworth, Allison <Allison.Whitworth@seattle.gov>; DOT_LA <DOT_LA@seattle.gov>; Pedersen, Alex <Alex.Pedersen@seattle.gov>; Strauss, Dan <Dan.Strauss@seattle.gov>; An, Noah <Noah.An@seattle.gov>; Thaler, Toby <Toby.Thaler@seattle.gov>
Subject: Exceptional trees must be considered at 1011 NE 71ST ST with proposed rezone of 3034865-LU

CAUTION: External Email

Dear PRC,

Yes, up-zoning may be a good thing in certain areas ...
and ignoring the dozen trees that will be removed is not such a good thing.

This proposal at **7012 Roosevelt Way NE** expands an existing NC2-55 lot to the adjacent property at 1007 NE 71st Street.

The Early Design Guidance (and ADR) excludes any evaluation of the dozen trees... most may be insignificant in nature. However, there is a vary large and likely Exceptional deciduous tree on the proposed eastern edge of the expanded zone. The tree originates on the property of 1011 NE 71st Street with a significant portion of it's critical root zone and canopy being assumed to be removed. Is there an arborist report for this east side of the proposed re-zone?

The problem is that LR zoning requires consideration of Seattle's Exceptional trees; and I do not believe consideration is required for NC zoning. It's just cut and infill... not many questions asked.

The Planner Allison Whitworth should consider the need for an arborist report to consider all tree groves and exceptional trees on the two-lot area,

the street trees on NE 71st, and what efforts will be made relative to tree retention and the Seattle tree coverage goals.

Alarming is that the rezone for Neighborhood Commercial is **yielding no neighborhood commercial!** Instead the proposed ground floor has utilities and services along the street in contrast with neighborhood design guidelines for Roosevelt and Seattle. Some residential units are tucked away in the back with no street exposure along NE 71st... a residential street. The ground floor along the sidewalk should be commercial, with services in back, and residential units on the floors 2-5. If no neighborhood commercial, then a better rezone would be lowrise multifamily LR2 or LR3.

Everyone always mentions off-street parking... as they should. The Seattle Times reported that roughly 85%+ of resident households within this area and most of Seattle own at least one car. It seems below grade parking could be considered along with neighborhood commercial. The design report states, however, "Because of the location within a transit-rich area, no vehicle parking is proposed. The project intends to provide high quality housing in a well connected area, and further densify the mixed use corridor along Roosevelt Way NE."

I'm guessing that the profiled residents for this "high-quality housing" without parking might be rather limited.

This is being copied to the two councilpersons in this area and their associated staff.

Thank you,
David Moehring
TREETAC Board Member

Image attached: I have marked with orange color the rough location of 2 large trees relative to the proposal. The word "Preferred" is from the architect of the project...

I'm not sure if there cannot be more ground floor relief to set away from the Exceptional trees.

Scheme C - Preferred / Code Compliant



1007 NE 71st St LR1(M)

Project Number: 3034865-LU identified as 7012 ROOSEVELT WAY NE rezones the adjacent LR1(M1) to NC2-55 (M)

Date of Application: 07/30/2020 Date Application Deemed Complete: 08/10/2020

Council Land Use Action to rezone a parcel of land from Low-rise 1 (M1) (LR1(M1)) to Neighborhood Commercial 2-55 (NC2-55(M)). Project includes a 6-story, 91-unit apartment building (69 small efficiency dwelling units, 16 efficiency dwelling units, 6 apartments). No parking proposed. Existing buildings to be demolished. Administrative Design Guidance conducted done under 3035227-EG. The top of this image is north.

This map is for illustrative purposes only. In the event of omissions, errors or differences, the documents in Seattle DCI's files will control.

Comments may be submitted through: 08/31/2020

The following approvals are required:

Contract Rezone rezone from LR1 (M1) to NC2-55 (M).

Administrative Design Review

SEPA Environmental Determination (This project is subject to the Optional DNS Process (WAC 197-11-

355) and Early DNS Process (SMC 25.05.355). This comment period may be the only opportunity to comment on the environmental impacts of this proposal.

David Moehring
312-965-0634

From: Charles Buitron <info@email.actionnetwork.org>
Sent: Monday, August 17, 2020 12:22 PM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

I'm in a neighborhood that is being cleared of all vegetation so multiple row houses are built. Many trees that offer so much to the neighborhood have been cut down. I know developers are pushing to delay and change these sensible proposals. They argue that they can't keep housing affordable with these proposals. That shows a total lack of imagination. There is one clear example of an architect offering his plans to develop a property with the same units and save a beautiful 50 yr old Tulip tree on the property. The developer refused to compromise. Now on this property and all multi family properties spring up boring skinny boxes that still sell for close to a million. Affordable???? This proposal needs to be implemented now. This is a compromise for agreeing to development in our neighborhoods. If this is not adopted expect a well organized uprising in the next election.

Charles B

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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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"
- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."
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- SECTION 2. Change the heading to "TREE PROTECTION". Remove references to "Exceptional Trees" only and change to "Trees". e.g., change "Exceptional Tree Protection Areas" to "Tree Protection Areas".
- SECTION 4. Add "The Director shall have the authority to allow replacement trees on both public and private property to meet the goals and objectives of race and social justice under Seattle's Equity and Environment Initiative."
- Under SMC 25.11.090 the Director has the authority to require "one or more trees" to be

planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve 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.

Charles Buitron

chasbuit@yahoo.com

723 N. 50 th St.

Seattle, Washington 98103-6035

From: Shawna Macneale <info@email.actionnetwork.org>

Sent: Monday, August 17, 2020 12:36 PM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please Strengthen Seattle's Tree Ordinance

CAUTION: External Email

Sandra Pinto de Bader,

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

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

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

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

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

Tree Service Providers (arborists) working on trees in Seattle.

8. Provide adequate funding in the budget to implement and enforce the updated ordinance.

Shawna Macneale

shawnaum@gmail.com

2614 NE 90th St

Seattle, Washington 98115

From: Deb Barker <djb124@earthlink.net>

Sent: Monday, August 17, 2020 12:37 PM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

Please adopt, with amendments as detailed below, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including maintenance obligations and tree service provider requirements.

Seattle must move forward NOW WITHOUT DELAY as urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
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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."
- Add "All replacement trees regardless of size are protected trees and can't be removed, and also add All replacement trees shall be maintained for a period of four (4) years so that they have a fighting chance to become established in a city that is tree deficient."
- SECTION 2. Change the heading to "TREE PROTECTION". Remove references to "Exceptional Trees" only and change to "Trees". e.g., change "Exceptional Tree Protection Areas" to "Tree Protection Areas".
- SECTION 4. Add "The Director shall have the authority to allow replacement trees on both public and private property to meet the goals and objectives of race and social justice under Seattle's Equity and Environment Initiative."
- Under SMC 25.11.090 the Director has the authority to require "one or more trees" to be planted as replacement trees for removed exceptional trees during development. The number of trees required should increase with the size of the tree removed, with a goal to achieve

equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise and or double as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.

- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats and need to be considered at the BEGINNING of the development process. The language of this SEPA code section should be included in the Director's Rule to be certain that the code is complied with. DON' ASSUME that everyone will know or care about the language.
- SECTION 6. SDCI should adopt SDOT's registration process and requirements to assist Tree Care Providers in complying with city code and regulations. Reduce the number of citations that will remove a Tree Care Provider from being registered with the city to no more than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor's license to ensure they have workers' compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

Again, there is NO GOOD REASON to delay this Directors Rule NOW. Please do it.

Thank you for protecting our urban forest.

Deb Barker

djb124@earthlink.net

6043 48th Avenue SW

Seattle, Washington 98136

From: David Dresser <info@email.actionnetwork.org>
Sent: Monday, August 17, 2020 12:52 PM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Save our Trees!

CAUTION: External Email

Sandra Pinto de Bader,

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

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

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

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

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2. Require the replacement of all Significant trees removed with trees that in 25 years will reach equivalent canopy volume – either on site or pay a replacement fee into a City Tree Replacement and Preservation Fund. Allow the Fund to also accept fines, donations, grants and set up easements.
3. Retain current protections for Exceptional Trees and reduce the upper threshold for Exceptional Trees to 24" DBH, protect tree groves and prohibit Significant Trees being removed on undeveloped lots.
4. Allow removal of no more than 2 Significant non-Exceptional Trees in 3 years per lot outside development
5. Establish one citywide database for applying for Tree Removal and Replacement Permits and to track changes in the tree canopy.
6. Post online all permit requests and permit approvals for public viewing.
7. Expand SDOT's existing tree service provider's registration and certification to register all

Tree Service Providers (arborists) working on trees in Seattle.

8. Provide adequate funding in the budget to implement and enforce the updated ordinance.

David Dresser

david1936@hotmail.com

2526 NE 91ST ST

SEATTLE, Washington 98115-3466

From: Jonathan Pasley <info@email.actionnetwork.org>

Sent: Monday, August 17, 2020 12:53 PM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements. This has been a long time coming -- the time to pass is now. There is no legit reason to delay.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

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Thank you for protecting our urban forest! And improving the health of all of humanity in regards to climate change.

Jonathan Pasley

mrconnecto@yahoo.com

3916 NE 109th ST

Seattle, Washington 981257932

From: Suzanne Grant <suzgrant206@gmail.com>

Sent: Monday, August 17, 2020 12:54 PM

To: SCI_DRulesComments <SCI_DRulesComments@seattle.gov>

Cc: Lewis, Andrew <Andrew.Lewis@seattle.gov>; Strauss, Dan <Dan.Strauss@seattle.gov>; Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>; Durkan, Jenny <Jenny.Durkan@seattle.gov>; Torgelson, Nathan <Nathan.Torgelson@seattle.gov>; David Moehring <dmoehring@consultant.com>; heidi calyxsite.com <heidi@calyxsite.com>; Steve Zemke <stevezemke@msn.com>; mkeeler <mkeeler@uw.edu>; Amalia Morsi <amalia.morsi@gmail.com>; Stuart Niven <panorarbor@gmail.com>;

Joshua Morris, Seattle Audubon <joshm@seattleaudubon.org>

Subject: Draft Director's Rule 13-2020

CAUTION: External Email

Hello,

I believe the “new” Director’s Rule does not solve the problem of tree removal in Seattle.

Here’s the main problem: The new Rule states on p.2: "If both the City and the applicant determine that tree protection is not possible by using all mechanisms available to the applicant per titles 23 and 25, then the Rule provides for tree replacement requirements when *tree removal is allowed*."

Removal of Significant and Exceptional trees should NOT BE ALLOWED! Seattle just had the hottest day on record since the 1960’s! Removal of healthy trees will exacerbate the worst effects of climate change. Most of Seattle’s urban trees are in single family zoning where most of the development and tree removal seems to be taking place.

Seattle Parks Arborist, Nick Johnson, and Kevin Bergsrud, Senior Planner @ Seattle Parks led an eye opening walk of dying trees on QA Boulevard last weekend. Diseases exacerbated by warmer, drier weather are killing our mature Birch, Maple, Oak and Chestnut trees. It is absolutely *unconscionable* that the City continues to take down *healthy* trees to reward a lack of creativity by the developer. More times than not, the development could take place *around* the trees! Due to yet another removal of a mature native Hemlock in the Greenlake neighborhood, Stuart Niven, ISA arborist, recently sent an email full of facts about the benefits of trees to SDCI. I hope you took time to read it. Mature Significant and Exceptional trees should NOT BE REMOVED! PERIOD.

Regarding Section 4, p.7: Tree Replacement. It is not exactly truthful to assume that "evergreens that are removed will be replaced by evergreens that achieve comparable size on public property." Where might this happen? And what Parks Employee will take care of it? We were told by Nick Johnson that *there are only 3 Parks employees responsible for watering ALL the Parks trees in Seattle!!* And a deciduous tree that is removed - same issue. The Exceptional Tulip Tree that was removed on QA hill in Dec 2019 will NOT be replaced by a tree species within the same size thresholds - and Hearing Examiner Vance allowed SDCI to cut it down per our hearing in July 2019.

Also: “The property owner of the site shall ensure that the trees planted remain healthy...” Who is going to enforce this policy? I have complained to SDCI per dead trees on new development near my house on QA hill and nothing has been done. Where is the budget for enforcement and maintenance of trees planted on private property? Another lie...

I hope you will follow the suggestions of the Urban Forestry Commission in their letter of July 1, 2020 to Nathan Torgelson. UFC has a comprehensive list of recommendations that I HOPE SDCI will consider and implement in their Director’s Rule, including:

1. We need better data - To know if Seattle is gaining or losing tree canopy *area and volume*, SDCI must track the overall loss and gain not just of tree numbers but the size and canopy volume of trees.
2. Establish a separate Urban Forestry Division within SDCI to have a clear path for urban forestry issues decision-making or resolution and increased accountability. Alternatively, oversight authority for tree protection implementation could be assigned to the Office of Sustainability & Environment.

Thank you for listening and considering these suggestions.

Suzanne Grant
2723 4th Ave W
Seattle, WA 98119

From: Melanie Davies <info@email.actionnetwork.org>

Sent: Monday, August 17, 2020 1:04 PM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

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.

Melanie Davies

melaniedavies81@gmail.com

2130 North 90th Street

Seattle, Washington 98103

From: Julia Shettler <jhelen@uw.edu>
Sent: Monday, August 17, 2020 1:07 PM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

Hi,

My name is Julia and I have lived in Green Lake area my entire life. Living here, I've had the chance to see the huge boom in population in Seattle -- and with it, lots of development of multi-family homes, condos, and more.

Our city is beginning to look more and more like New York, San Francisco and Los Angeles in a bad way: it is turning in to a concrete jungle. Trees are needlessly chopped down by overseas developers and little consideration is given to our urban forest and environment.

It is indisputable that trees enhance quality of life, help the environment, and more. It is a false dichotomy that we must chop down trees to accommodate Seattle's population growth. This is a narrative pushed by developers to maximize their profits on buildings (after all, constructing buildings around trees is a little harder than just chopping them down).

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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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 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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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.

Julia Shettler

jhelen@uw.edu

7419 Woodlawn Ave NE

Seattle, Washington 98115

From: Barbara Goldoftas <bgoldoft@alum.mit.edu>
Sent: Monday, August 17, 2020 1:07 PM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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Thank you for protecting our urban forest.

Barbara Goldoftas

bgoldoft@alum.mit.edu

16028 27th Ave NE

Shoreline , Washington 98155

From: Kathryn Neumann <info@email.actionnetwork.org>

Sent: Monday, August 17, 2020 1:13 PM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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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.

Kathryn Neumann

lushgardensseattle@gmail.com

7221 5th Ave NW

Seattle, Washington 98117

From: Brent McFarlane <info@email.actionnetwork.org>

Sent: Monday, August 17, 2020 1:23 PM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please adopt new Seattle Tree protections with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

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Thank you for protecting our urban forest.

Brent McFarlane

mcfarmer@me.com

12248 Phinney Ave N

Seattle, Washington 98133

From: Jeffrey West <info@email.actionnetwork.org>

Sent: Monday, August 17, 2020 1:27 PM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please adop SDCI's Director's Rule 13-2020 with listed modifications

CAUTION: External Email

Sandra Pinto de Bader,

I support the adoption, with amendments, SDCI's Director's Rule 13-2020 – Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move without the proposed delay in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are positive steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
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The following modifications to the draft Director's Rule are needed:

- Change Subject Title to remove words "land division" and replace with "Development"
- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."
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Jeffrey West

jeffreykwest@gmail.com

7333 Earl Ave NW

Seattle, Washington 98117

From: Emanuel Jacobowitz <info@email.actionnetwork.org>

Sent: Monday, August 17, 2020 1:29 PM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: It's time to adopt SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

I write in support of SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements, with certain amendments for greater effect. I am a member of Plant for the Planet Seattle. Seattle's urban forest is one of the finest in the nation, providing shade, shelter, beauty, emotional health, and even food for our residents. But canopy is diminishing every year, and we will lose our "Emerald City" if we do not improve our regulations.

Seattle should not delay further. Increasing the protection for our tree canopy was first proposed by the Seattle City Council 11 years ago. These changes are long overdue.

The draft Director's Rule includes several important improvements:

- It allows protection of more trees--6 inches diameter at standard height and larger. the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designated "Exceptional" trees may grow to 30" diameter at standard height.
- Requiring Tree Care Providers to register with the City (SDOT requires this).
- When exceptional trees are removed for development, they must be replaced, without exception.

- Removing an exceptional tree as a "hazard tree" becomes less easy.

I agree with the Seattle Urban Forestry Commission that the draft rule does not go far enough and should be changed as follows:

- Change Subject Title to remove words "land division" and replace with "Development"
- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."
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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 the greenbelt.

Emanuel Jacobowitz

mannyjac1@gmail.com

11518 25th Ave NE

Seattle, Washington 98125

From: kevin orme <info@email.actionnetwork.org>

Sent: Monday, August 17, 2020 1:41 PM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Part 2

CAUTION: External Email

Sandra Pinto de Bader,

Besides my comments already submitted last night (sunday aug 16) as to the Director's Rule updates specifically, I would also refer you to these two articles on the important POLICY

reasons for protecting trees in Seattle and urban areas generally - especially when we in the PNW are lucky enough to have more trees than most other places on earth already!?!?:

A Guide to Preserving Trees in Development Projects

- This publication explains tree health and environmental considerations and details how to preserve trees.-

<https://extension.psu.edu/a-guide-to-preserving-trees-in-development-projects>

Article: Trees help cities thrive: Here's why we need them more than ever

- As city populations soar, it might seem like there isn't much room for trees. But ecologists say these climatic powerhouses are an often overlooked solution to the health and environmental issues greater density brings.

<https://www.dw.com/en/trees-extreme-weather-heat-stress-water-drought-health-green-parks-cities-climate-change/a-54210247>

Protecting Urban Forests

...City trees, of course, have enormous benefits beyond their physical beauty. They clean the air, cool the climate, control stormwater runoff, prevent soil erosion and lower energy costs. Studies show that they also reduce stress in city dwellers, lower crime, increase property values and reduce illness.

<https://www.americanforests.org/blog/protecting-urban-forests/>

kevin orme

ovaltinelatte@hotmail.com

502 N 80th

seattle, Washington 98103

From: Kyle Hammond <info@email.actionnetwork.org>

Sent: Monday, August 17, 2020 1:47 PM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
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- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
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- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees

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

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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.”

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Thank you for protecting our urban forest.

Kyle Hammond
kylehammond2017@gmail.com
5228 20th Ave NE
Seattle, Washington 98105

From: Mike Ewanciw <info@email.actionnetwork.org>
Sent: Monday, August 17, 2020 1:47 PM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

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SMC 25.11.090

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Thank you for protecting our urban forest.

Mike Ewanciw

mikewan@aol.com

11325 Alton Ave. NE

Seattle, Washington 98125

From: Dale Reite <dhale2000@comcast.net>

Sent: Monday, August 17, 2020 1:52 PM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

How can we delay these sensible guidelines with what we know about the benefits of urban trees. Developers will always make their money and only require more imagination to develop

multi family units that will be more attractive to the buyer and the neighborhood with existing trees. Please pass this now. It's overdue by what I've seen in my neighborhood.

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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Thank you for protecting our urban forest.

Dale Reite

dhale2000@comcast.net

723 N. 50 th St.

Seattle, Washington 98103-6035

From: Donna Sellers <info@email.actionnetwork.org>

Sent: Monday, August 17, 2020 1:52 PM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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Thank you for protecting our urban forest.

Donna Sellers

dlsellers2000@yahoo.com

7413 Woodlawn Ave NE

Seattle, Washington 98115

From: Barry Pollack <info@email.actionnetwork.org>
Sent: Monday, August 17, 2020 1:53 PM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Save Our Trees!

CAUTION: External Email

Sandra Pinto de Bader,

Seattle's trees and urban forest are vital to keeping our city healthy and livable. Trees and the urban forest comprise a vital green infrastructure. Trees reduce air pollution, storm water

runoff and climate impacts like heat island effects, while providing essential habitat for birds and other wildlife. They are important for the physical and mental health of our residents.

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

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

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

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

Barry Pollack

barrynpollack@gmail.com

2222 NE 92nd Street, #315
Seattle, Washington 98115

From: Rachel Pearson <rpse@comcast.net>
Sent: Monday, August 17, 2020 1:56 PM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

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Thank you for protecting our urban forest.

Rachel Pearson

rpse@comcast.net

5527 36th Ave NE

Seattle, Washington 98105

From: Jennifer Mannheim <jennifer@Mannheim.us>

Sent: Monday, August 17, 2020 2:03 PM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

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Jennifer Mannheim

jennifer@Mannheim.us

1203 NW 83rd St

Seattle, Washington 98117

From: Elissa Favero <info@email.actionnetwork.org>
Sent: Monday, August 17, 2020 2:07 PM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090
- Tightening tree removal requirements for exceptional trees as hazard trees

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

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Thank you for protecting our urban forest, Elissa Favero

Elissa Favero

05ecfster@gmail.com

312 NE 42ND ST

SEATTLE, Washington 98105

From: Toni Cross <seasonco@comcast.net>

Sent: Monday, August 17, 2020 2:09 PM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

Sincerely,

Toni Cross
Certified Professional Horticulturist

Toni Cross
seasonco@comcast.net
368 NW 47th Street
SEATTLE, Washington 98107

From: Leslie Reed <info@email.actionnetwork.org>
Sent: Monday, August 17, 2020 2:13 PM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

Leslie Reed

lesizmor12@yahoo.com

3646 39th Ave W

Seattle, Washington 98199

From: Katie Thien <info@email.actionnetwork.org>
Sent: Monday, August 17, 2020 2:15 PM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please impose consequences on developers for clearing trees!

CAUTION: External Email

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

Katie Thien

katiethien2810@gmail.com

4750 21st Ave NE

Seattle, Washington 98105

From: Margaret Nims <margot888@comcast.net>

Sent: Monday, August 17, 2020 2:30 PM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

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Thank you for protecting our urban forest.

Margaret Nims

margot888@comcast.net

2722 NE 87th Street
SEATTLE, Washington 98115

From: cuhrollin@everyactioncustom.com <cuhrollin@everyactioncustom.com>
Sent: Monday, August 17, 2020 2:37 PM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: In Regards to the Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

As a horticulture student, a child raised by an Urban Planner and a Landscape Architect, as well as a supporter of Seattle Audubon, protecting Seattle's urban forest is of utmost importance to me. Trees, especially mature specimens, provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city. We need to conserve and promote preservation of our mature trees which provide clean air, cooler temperatures, habitat, soil amelioration and so much more. The need for trees to remain and be preserved is more important on various scales than their removal. Their removal goes against the natural ecological processes and degrades soil integrity, water quality and promotes soil erosion.

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

The proposed rule can be strengthened in the following ways:

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

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

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

Sincerely,
 Carolyn Rubenkonig
 8218 210th PI SW Edmonds, WA 98026-7048 cuhrollin@gmail.com

From: Kaitlyn Lindsay <info@email.actionnetwork.org>
Sent: Monday, August 17, 2020 3:03 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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Thank you for protecting our urban forest.

Kaitlyn Lindsay

kaitie.e.lindsay22@gmail.com

9317 40th Ave NE

Seattle , Alberta 98115

From: Diane McCutcheon <info@email.actionnetwork.org>

Sent: Monday, August 17, 2020 3:10 PM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Save Our Trees!

CAUTION: External Email

Sandra Pinto de Bader,

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

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

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

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

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

and to track changes in the tree canopy.

6. Post online all permit requests and permit approvals for public viewing.
7. Expand SDOT's existing tree service provider's registration and certification to register all Tree Service Providers (arborists) working on trees in Seattle.
8. Provide adequate funding in the budget to implement and enforce the updated ordinance. Lets not become a City that destroys our Beauty for the almighty dollar.

Diane McCutcheon

243454duncan@gmail.com

3130 NE 117th St, Known forever-
Seattle, Washington 98125

From: Kathleen Kerkof <info@email.actionnetwork.org>
Sent: Monday, August 17, 2020 3:13 PM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
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- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires
- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090

- Tightening tree removal requirements for exceptional trees as hazard trees

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

- Change Subject Title to remove words “land division” and replace with “Development”
- PURPOSE AND BACKGROUND. add “SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city.”
- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as “a group of 3 or more significant trees with overlapping or touching crowns.” Include street trees in groves.
- Add “Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages.”
- Add “All replacement trees regardless of size are protected trees and can’t be removed.”
- SECTION 2. Change the heading to “TREE PROTECTION”. Remove references to “Exceptional Trees” only and change to “Trees”. e.g., change “Exceptional Tree Protection Areas” to “Tree Protection Areas”.
- SECTION 4. Add “The Director shall have the authority to allow replacement trees on both public and private property to meet the goals and objectives of race and social justice under Seattle’s Equity and Environment Initiative.”
- Under SMC 25.11.090 the Director has the authority to require “one or more trees” to be planted as replacement trees for removed exceptional trees during development. The number

of trees required should increase with the size of the tree removed, with a goal to achieve equivalent canopy area and volume in 25 years. Any in-lieu fee must also rise as the size of the removed tree increases. The city can not wait 80 years to replace an 80-year-old western red cedar tree and expect to maintain its canopy goals as large exceptional trees are removed during development.

- SECTION 5. SEPA requirements under SMC 25.05.675 N are for protecting special habitats and need to be considered at the beginning of the development process. The language of this SEPA code section should be included in the Director's Rule to be certain that the code is complied with.

- SECTION 6. SDCI should adopt SDOT's registration process and requirements to assist Tree Care Providers in complying with city code and regulations. Reduce the number of citations that will remove a Tree Care Provider from being registered with the city to no more than 2 per year. Require annual registration same as Seattle business licenses require. Require that Tree Care Provider companies have a WA State contractor's license to ensure they have workers' compensation. Require they have a certificate of insurance that lists the city as an additional insured so the city cannot be sued. Require that all jobs either have a certified arborist on the work site or that they have visited the site and officially sign off on the specific work being done.

With good planning, there is no reason we can't have both new housing and trees! Thinking that we always must sacrifice the environment in order to have progress is a continuation of the outdated, limited thinking that has created our current world of climate change, pollution, ecological collapse and extinction of species at an ever accelerating pace!. I would like to close with a quote from a Joni Mitchell song: " and don't it always seems to go that you don't know what you've got till it's gone!"

Thank you for protecting our urban forest

Kathleen Kerkof

katkerkof@hotmail.com

2235 NW 64th St

Seattle, Washington 98107

From: Andrea Lin <info@email.actionnetwork.org>
Sent: Monday, August 17, 2020 3:15 PM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

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.

Andrea Lin

asdf.lina@gmail.com

815 W Argand St

Seattle, Washington 98119

From: Linda Berlage Metz <info@email.actionnetwork.org>

Sent: Monday, August 17, 2020 3:40 PM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

Dear SDCI,

I agree with the contents of this form letter. I am also adding a personal note.

I live in a 1909 Ballard house, and in my yard there stands an exceptional Black Walnut tree that is at least 80 years old.

Over the past 20 years I have witnessed Eagles, Crows, Robins, Scrub Jays, Chickadees, Flickers, Raccoons, Possums, Squirrels, and yes, Rats, use the tree for food, nests, rest, and play. It helps to cool my yard and house in the summer. In the Fall I collect the walnut husks to use for a clothing dye, and make a delicious Italian liqueur with the nuts!

My point is, these elder trees are beautiful, and serve so many purposes. They are irreplaceable. I am not against new development, but taking down healthy trees of all sizes for development needs to be reconsidered.

We need more, and better tree protections, now! Future Seattle residents will say we were wise if we take bold steps to protect our trees.

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.

Linda Berlage Metz
Ballard

Linda Berlage Metz
ljbmetz@gmail.com
824 NW 54th Street
Seattle, Washington 98107

From: Ginny Allemann <vallemann@comcast.net>
Sent: Monday, August 17, 2020 3:43 PM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

Stop paving paradise! We need trees more than ever! And we need big ones! Come on Seattle! Don't bow (again) to developers!

Thank you.

Ginny Allemann

vallemann@comcast.net

2344 Federal Ave. E.

Seattle, Washington 98102

From: Irene Svete <info@email.actionnetwork.org>
Sent: Monday, August 17, 2020 3:45 PM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

As a resident of Capitol Hill and a member of Seattle Audubon, I've been watching my neighborhood's tree canopy vanish year by year. It has to stop. Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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Thank you for protecting our urban forest.

Irene Svete

varina8@hotmail.com

308 E Republican St. Apt 803

Seattle , Washington 98102

From: CHRISTINE ZIEMNIK <xnik@comcast.net>
Sent: Monday, August 17, 2020 3:55 PM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: trees

CAUTION: External Email

As a former Tree Steward who has, with groups, planted many trees on Beacon Hill, I fully support efforts to maintain and protect trees from falling victim to developers or homeowners whose interests are bottom lines and zero maintenance.

Thank you.

Christine Ziemnik

From: nicole.gomez@gmail.com <info@email.actionnetwork.org>
Sent: Monday, August 17, 2020 4:22 PM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

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Thank you for protecting our urban forest.

nicole.gomez@gmail.com

343 NW 80th Street

Seattle, Washington 98117

From: Atticus Bishop <info@email.actionnetwork.org>

Sent: Monday, August 17, 2020 4:26 PM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

Atticus Bishop

atticusbishop@mac.com

18183 Normandy Terrace SW

Normandy Park, Washington 98166

From: Emily O'Connor <eoconnor21@jesuitmail.org>

Sent: Monday, August 17, 2020 4:26 PM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020!! Protect Nature!

CAUTION: External Email

Sandra Pinto de Bader,

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- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090

- Tightening tree removal requirements for exceptional trees as hazard trees

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

- Change Subject Title to remove words "land division" and replace with "Development"

- PURPOSE AND BACKGROUND. add "SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city."

- SECTION 1. Reduce the number of trees and sizes required to be a tree grove. Kirkland, Woodinville, and Duvall all define a tree grove as "a group of 3 or more significant trees with overlapping or touching crowns." Include street trees in groves.

- Add "Significant trees may become exceptional as they grow in size. They are future replacements in the urban forest for exceptional trees when they die. Development projects must be designed to maximize the retention of both exceptional and significant trees to maintain a diversity of tree species and ages."

- 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.

The city is prettier with trees!

Sincerely,

Emily O'Connor

Emily O'Connor

eoconnor21@jesuitmail.org

2075 NE Josephine dr.

Hillsboro, Oregon 97124

From: susannah white <susannahw@comcast.net>
Sent: Monday, August 17, 2020 4:32 PM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please Update Seattle's Tree Ordinance

CAUTION: External Email

Sandra Pinto de Bader,

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

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

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

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

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

Tree Service Providers (arborists) working on trees in Seattle.

8. Provide adequate funding in the budget to implement and enforce the updated ordinance.

susannah white

susannahw@comcast.net

3634 Bagley Ave North

SEATTLE, Washington 98103

From: Meredith Radella <mrad15@comcast.net>

Sent: Monday, August 17, 2020 4:35 PM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

Seattle must move forward now, without the delay urged by some, in adopting this updated Director's Rule with the amendments proposed below. This process of increasing protection for our urban forest was first proposed by the Seattle City Council 11 years ago and is long overdue.

The following updates as proposed in the draft Director's Rule are great steps forward:

- Reducing the upper threshold on exceptional trees to 24 inches in diameter at standard height (DSH) from 30 inches
- Designating trees 6 inches DSH and larger as protected trees, starting in the platting and short platting process
- Requiring Tree Care Providers to register with the City as the Seattle Dept. of Transportation already requires

- Continuing protection of tree groves as exceptional trees, even if a tree is removed from the grove
- Making clear that all exceptional trees removed during development must be replaced per SMC 25.11.090

- Tightening tree removal requirements for exceptional trees as hazard trees

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

- Change Subject Title to remove words “land division” and replace with “Development”
- PURPOSE AND BACKGROUND. add “SMC 23 requires that all trees 6 inches DSH and larger must be indicated on all site plans throughout the platting and sub-platting process, and that projects must be designed to maximize the retention of existing trees. This requirement continues throughout any subsequent development on all lots in all zones in the city.”
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Thank you for protecting our urban forest.

Meredith Radella

mrاد15@comcast.net

4808 3rd Ave NW

Seattle, Washington 98107

From: Terry Tazioli <info@email.actionnetwork.org>
Sent: Monday, August 17, 2020 4:44 PM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

I'm certain you're received many of these. I hope a lot of these.

Time for dawdling on this is over. What is this city without its beauty, without its health, without its sanctuary for all of us? Our city's forests are our treasures. Don't bury them.

Thank you.

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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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.

Terry Tazioli

ttazioli@me.com

8427 34th Ave. SW

Seattle, Washington 98126

From: annbstevens50@everyactioncustom.com <annbstevens50@everyactioncustom.com>
Sent: Monday, August 17, 2020 4:46 PM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

For many years I have been tracking the neglect of tree protection in Seattle. Trees provide essential services to people and support over 100 local bird species. Both people and birds need a healthy, growing, and equitably distributed urban forest to thrive in our city. Cities around Seattle are doing a much better job of protecting trees.

Do not further delay improving the directors rule on tree protection. Many years have already passed without the administrative rules being strengthened and enforced.

Thank you for your work on proposed Director's Rule 13-2020. It offers some immediate improvements for tree protection, including expanding protections for big tree to 24 inches dbh, tightening removal of hazard trees, emphasizing tree retention during land division, registering arborists, and beginning to track trees on private property.

The proposed rule can be strengthened in the following ways:

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

- Protect red alders and bitter cherries. These native trees provide important resources to birds and other wildlife and contribute to our sense of place in Seattle. Following the "right tree, right place" philosophy, these native trees can safely thrive and should be protected like other species.
- Expand the definition of tree groves to stands of six or more trees at least six inches in diameter, including street trees. Tree groves provide important habitat for birds and are becoming less common outside of parks and natural areas. We must do more to protect them and there is also no ecological reason why street trees should not be allowed to contribute to or be protected as part of a grove.
- Require public notice postings on development site and online for removal of Exceptional trees, even when hazardous, to ensure community members know when and where legal tree removal is occurring.
- Require replacement for trees removed from groves and removed hazard trees.

Require replacement trees to replace the canopy removed within 25 years.

Increase the fee paid to replace trees as the size of the trees removed increases

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

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

Sincerely,
Ann Stevens
7014 21st Ave NE Seattle, WA 98115-5714 annbstevens50@gmail.com

From: Cynthia Slate <info@email.actionnetwork.org>

Sent: Monday, August 17, 2020 4:51 PM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Director's Rule 13-2020-not good enough

CAUTION: External Email

Sandra Pinto de Bader,

This rule doesn't grow canopy in neighborhoods, what it does is save current trees. There are less the 17% canopy in my neighborhood and all of our trees, except 8 of them are under 24 inches. We need to reforest our neighborhoods that don't have enough trees. How does this grow our canopy to prevent asthma and other health issues? It doesn't. This protects wealthy neighborhoods that still have 30% canopy.

*We need to require that if you have the space on a planting strip, you should plant a large tree. So many planting strips are just grass only even though they are 10 and 12 feet wide. Require trees be planted on these planting strips.

* We need more native conifers -require that all native conifers are protected at 6 inches. 24 inches is too late, to save bird species.

*This doesn't go far enough to give each neighborhood the canopy % we need to be healthy.

*Please add stronger requirements to grow native trees.

SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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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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Thank you for protecting our urban forest.

Cynthia Slate

cynthiaslate@gmail.com

7743 12th ave NW

Seattle, Washington 98117

From: William Gould Gould <willwrite@msn.com>

Sent: Monday, August 17, 2020 4:52 PM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

I urge you to stop delaying implementing this.

We can;t wait any longer. Our inaction on this is a travesty and betrayal of trust to our children and future generations.

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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Thank you for protecting our urban forest.

William Gould Gould

willwrite@msn.com

3527 46th Ave NE

SEATTLE, Washington 98105-5324

From: Janet Kimball <info@email.actionnetwork.org>

Sent: Monday, August 17, 2020 5:05 PM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

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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. Wedgwood is blessed with lovely, mature trees. With the heat today (Monday, August 17), they offer a respite and shade.

Janet Kimball

hughandjanetkimball@yahoo.com

8051 28th AVE NE

SEATTLE, Washington 98115

From: Rosemary Fisher <info@email.actionnetwork.org>
Sent: Monday, August 17, 2020 5:23 PM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Save our Trees!

CAUTION: External Email

Sandra Pinto de Bader,

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

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

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

Rosemary Fisher

rosemr2001@yahoo.com

7305 42nd Ave NE

Seattle, Washington 98115

From: samanthamalay@everyactioncustom.com <samanthamalay@everyactioncustom.com>
Sent: Monday, August 17, 2020 5:59 PM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Proposed Director's Rule 13-2020 Relating to Tree Protection

CAUTION: External Email

Dear Urban Forestry Policy Advisor Sandra Pinto de Bader,

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

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

The proposed rule can be strengthened in the following ways:

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

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

Sincerely,
Samantha Malay
4507 A 15th Ave S Seattle, WA 98108-1819 samanthamalay@yahoo.com

From: Stephen Shettler <info@email.actionnetwork.org>

Sent: Monday, August 17, 2020 6:40 PM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

I've been living in Seattle I was 4 and I'm now 18 heading into college at the UW. It's been hard seeing development come at the cost of trees when thoughtful planning could incorporate both density and an urban forest.

Please adopt, with amendments, SDCI's Director's Rule 13-2020 - Designation of Exceptional and Significant Trees, Tree Protection, Retention, and Tree Removal during land division, including tree service provider requirements.

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.

Stephen Shettler

stephenshettler02@gmail.com

7419 Woodlawn Ave NE

Seattle, Washington 98115

From: Nancy Barcus <nwbarcus@comcast.net>

Sent: Monday, August 17, 2020 7:04 PM

To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>

Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

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 Barcus

nwbarcus@comcast.net

350 N 75th
Seattle, Washington 98103

From: Olivia Mcapine <info@email.actionnetwork.org>
Sent: Monday, August 17, 2020 7:20 PM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

Sandra Pinto de Bader,

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Thank you for protecting our urban forest.

Olivia Mcapine

oliviakmcalpine@gmail.com

6534 49th ave ne

Seattle, Washington WA

From: Margaret Cummings <peggyc@seanet.com>
Sent: Monday, August 17, 2020 8:09 PM
To: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: Please adopt, with amendments, SDCI's Director's Rule 13-2020

CAUTION: External Email

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Thank you for protecting our urban forest.

Margaret Cummings

peggyc@seanet.com

3116 SW Trenton

Seattle , Washington 98126

From: peg <mpegrose@gmail.com>

Sent: Monday, August 17, 2020 8:18 PM

To: SCI_DRulesComments <SCI_DRulesComments@seattle.gov>
Cc: Pinto de Bader, Sandra <Sandra.Pinto_de_Bader@Seattle.gov>
Subject: SDCI Directors Rule 13-2020- SMC 25.11

CAUTION: External Email

I am writing in support of the proposed changes in the Directors Rule 13-2020 submitted by the UFC via a formal letter. Personally I have spent many years as a professional landscape architect frustrated by Seattle's weak and confusing tree protection requirement. I volunteered on the Urban Forestry Commission for several years with the primary goal of new ordinance language. Thus these changes are very important to me.

I agree that the tree protection requirements need to be gathered in one location - linked or direct reference - it is too confusing currently.,

The one recommendation in the UFC letter I have a bit of a question about is the definition of tree - this is always tricky - as the professional definition does not accommodate our native Big leaf mapes, vine maples and river birch as they often do not have dominant leaders.

I encourage you to move with the UFC recommendations to the directors rule.

and... I just saw orcas!!!!

--

Peg Staeheli
206-854-1741
