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RE: Council Bill 120207 Tree service provider registration

Dear Councilmembers Strauss and Pederson,

The Urban Forestry Commission (UFC) would like to thank you for proposing and ultimately leading the city council to adopt Council Bill 120207 which establishes a public registration system for tree service providers operating within Seattle and requires all tree service providers operating in the city to register by November 10, 2022. The UFC has long been supportive of this action and is pleased to see this initial step towards updating Seattle's tree protections enacted.

The UFC believes this bill will support urban forest conservation by ensuring that tree service providers are knowledgeable about and beholden to the city's tree protection regulations. By requiring that the service provider has an International Society of Arboriculture (ISA) certified arborist employed or on retainer, we can ensure that our tree care providers are knowledgeable and in compliance with American National Standards Institute (ANSI) Standards.

In addition, the new code requires that tree service providers inform their hiring entity that they are required to post a notice of tree work at least three *business* days prior to when the tree work will be initiated. The UFC supports public posting and notification of tree work because it provides an opportunity for concerned citizens to ensure that tree work will comply with the city's regulations. Relying on citizen oversight of tree regulation protections is clearly a sub-optimal means for enforcing city code. This arrangement places the burden of enforcement on citizens and neighbors as opposed to the city. The UFC would prefer to see a city permit system in place that would help ensure that the city can track and evaluate tree removal directly as opposed to relying on voluntary compliance and citizen oversight. The UFC believes that three business days is insufficient time for citizens to be able to review proposed work and ensure that it follows requirements. If there were a violation, citizens would need time to contact a city department. Seattle Department of Transportation posts notice 14 days in advance and the UFC believes this would be a more appropriate time frame.

Despite our disagreement on the appropriate time interval for tree work notification, we are overall very pleased that the City has taken this important step to ensuring that our valuable urban forest is cared for by knowledgeable and accountable tree service providers.

Thank you,