

#	Directly related to Draft Rule 21-2017	Topic	Who	Comment	Response
1	Yes	Tree Value Calculation	Anna Pedroso	In cases of a tree not surviving, there should be a bond to assure another tree will be planted and penalties for noncompliance should go into a fund to purchase and preserve environmentally sensitive areas.	This suggestion for a bond and for use of penalties would require a code amendment. A replanting plan that is reviewed and approved by qualified SDCI staff is a required part of the code enforcement process.
2	Yes	Tree Value Calculation	Anna Pedroso	When determination the value of an individual tree, it's important to include not just the cost of the replacement tree, but the cost of replanting in an area which should have adequately healthy and appropriate soil for the tree.	The cost of deciduous and coniferous trees found in the Species Rating Guide published by the Pacific Northwest Chapter of the International Society of Arboriculture is based on average costs for both the tree itself and installation costs.
3	Yes	Tree Value Calculation	Don Cave	A cost base approach will need to use much large numbers, if it is to a significant deterrent to cutting. It needs to be in effect the inverse of the "Market" approach – for comparable properties with and without the tree, the property with the tree might worth many thousand less, and the penalties need to compensate for that.	This suggestion would require a code amendment.  Comment acknowledged and shared with other staff working on tree protection issues.
4	Yes	Tree Value Calculation	Don Cave	Coniferous trees (\$60) are more valuable in important ways than deciduous tree (\$72).	We acknowledge the value of conifers but are required to use a basic tree cost founded on a base price per square inch for conifers or deciduous trees. The final rule has been updated to reflect the regional cost of conifer trees as \$57 per square inch.
5	Yes	Tree Value Calculation	Don Cave	The 60% default is compounded of course, when applied to multiple factors – species, condition, location – routinely reducing values to a small fraction, when even the full Pacific Northwest ISA cost is fairly trivial in the context of current development potential yield.	Comment acknowledged and shared with other staff working on tree protection issues.
6	Yes	Tree Value Calculation	Don Cave	Use only condition rating. Don't include the other ratings. The more ratings (multipliers) you include, the less the tree will be valued.	This suggestion would require a code amendment. Comment acknowledged and shared with other staff working on tree protection issues.

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7	Yes	Tree Value Calculation	Jim Davis	There should be an additional factor entitled Climate Crisis Acceleration to supplement the four factors of basic tree costs, species rating, location, and condition rating.	This suggestion would require a code amendment. Comment acknowledged and shared with other staff working on tree protection issues.
8	Yes	Tree Value Calculation	Michaela Wehner	The full and true value of each tree, including carbon impact, be assessed and paid as a penalty by the property owner.	This suggestion would require a code amendment. Comment acknowledged and shared with other staff working on tree protection issues.
9	Yes	Tree Value Calculation	Plant Amnesty	Additional fines should be based on a sliding scale ensuring corporate developers of exceptional means cannot disregard fines as a “cost of business”.	This suggestion would require a code amendment. Comment acknowledged and shared with other staff working on tree protection issues.
10	Yes	Tree Value Calculation	- Plant Amnesty - Brent McFarlane - Sally Jo Gilbert de Vargas - Mary Keeler - Monica Wood - Leia Berg - Polly Freeman	Penalties should include a monetary fee to be put into land acquisition fund to preserve environmentally valuable areas, such as ravines, wetlands, or exceptional habitat.	This suggestion would require a code amendment. Comment acknowledged and shared with other staff working on tree protection issues.
11	Yes	Tree Value Calculation	- Plant Amnesty - Brent McFarlane - Sally Jo Gilbert de Vargas - Mary Keeler	Require that climate calculation using “i-Tree” calculator or similar calculation system be used in addition to all other methods of determining tree value: to include carbon sequestration, pollution reduction, stormwater retention, and cooling effects of trees and tree canopy.	This suggestion would require a code amendment. Comment acknowledged and shared with other staff working on tree protection issues.

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			- Monica Wood - Leia Berg		
12	Yes	Tree Value Calculation	Polly Freeman	When we determine tree value, we need to include in the assessment some kind of accepted metric for factoring in their value to climate stability, including the role trees play in carbon sequestration, pollution reduction, stormwater retention as rain increase in intensity, and the cooling effects of trees and tree canopy as we experience hotter summer.	This suggestion would require a code amendment. Comment acknowledged and shared with other staff working on tree protection issues.
13	Yes	Tree Value Calculation	Ron and Deejah Sherman-Peterson	Developers will undoubtedly love it because the cost to them of removing a large, mature tree is negligible after all the arbitrary “deductions” are taken.	Changing the formula would require a code amendment. Comment acknowledged and shared with other staff working on tree protection issues.
14	Yes	Tree Value Calculation	Ron and Deejah Sherman-Peterson	The tree valuation calculation does not address the cost to wildlife.	Changing the formula would require a code amendment. Comment acknowledged and shared with other staff working on tree protection issues.
15	Yes	Tree Value Calculation	Ron and Deejah Sherman-Peterson	We strongly believe that climate change mitigation cost should be included.	This suggestion would require a code amendment. Comment acknowledged and shared with other staff working on tree protection issues.
16	Yes	Tree Value Calculation	Sandra Whiting	Given that SDCI is required to use the Guide for Plant Appraisal, for determining the value of a tree removed without a permit, I think the proposed Director’s Rule is a reasonable approach.	Comment acknowledged and shared with other staff working on tree protection issues.
17	Yes	Tree Value Calculation	Sandra Whiting	I would recommend also that the rating for tree groves removed without a permit and without sufficient information on condition be raised above 75%.	The final rule sets the condition and location ratings for tree groves at 80%.
18	Yes	Tree Value Calculation	Sandra Whiting	I would suggest that using 60% for a condition rating when there is no clear information available regarding the evidence of disease or other hazard is	The final rule sets the condition rating to 70% when there is no clear information available regarding the structural integrity and health of the tree.

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				too generous. In my opinion, the 60% should be raised to 90% or even 100% in the absence of sufficient information.	
19	Yes	Tree Value Calculation	Scott Baker	Several of our Municipal clients have adopted a per inch valuation for illegally removed trees and, we can see that this is working not only to deter violations but also to streamline the process of making the City whole. I suggest this approach and setting a valuation of \$1000.00 per inch diameter.	This suggestion would require a code amendment. Comment acknowledged and shared with other staff working on tree protection issues.
20	Yes	Tree Value Calculation	Scott Baker	Add to that the cost of restoring damages to the site, within reasonable guidelines, and I think the City would succeed in deterring people from illegal cutting.	This suggestion would require a code amendment. Comment acknowledged and shared with other staff working on tree protection issues.
21	Yes	Tree Value Calculation	Sean Dugan	The most significant concerns are the costs to the city in legal fees, the subjectivity of the formulas, and the lack of understanding of where this appraisal process is heading in the arboriculture world. The "Guide" being referred to is in the process of being dramatically changed. The Director's Rule will be fundamentally flawed as it is based on a system that is going to be obsolete.	The code and the rule provide for the use of updated information so that new costs and changes to the formula can be used. Other changes would require a code amendment. Comment acknowledged and shared with other staff working on tree protection issues.
22	Yes	Tree Value Calculation	Sean Dugan	There is also a significant error in the rule, Section 1(3) regarding the price per square inch for confers. The rule states \$60 per square inch, when the Regional Committee states the price to be \$57 per square inch	The final rule has been updated to reflect the regional cost of conifer trees as \$57 per square inch.
23	Yes	Tree Value Calculation	Seattle Urban Forest Commission	The UFC recommends utilizing a simpler valuation method for trees, not following one of the approaches outlined in the Guide for Plant Appraisal as stated in SMC 25.11.100.I. While the Cost Approach appears to be the most appropriate of the options provided, it is still too complex for its ultimate purpose. The UFC feels that having multi-	This suggestion would require a code amendment. Comment acknowledged and shared with other staff working on tree protection issues.

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				part calculations for penalty assessment adds challenges to code enforcement through undue complexity. This complicated formula leads to a code that cannot be understood by property owners, the public, or many tree work professionals. Ideally, the penalty scheme should be simple enough to apply and provide a significant enough penalty to deter violation.	
24	Yes	Tree Value Calculation	Seattle Urban Forest Commission	We also recommend using multiplying weighing factors based on whether the illegal removal involves a grove.	This suggestion would require a code amendment. Comment acknowledged and shared with other staff working on tree protection issues.
25	Yes	Tree Value Calculation	Seattle Urban Forest Commission	We suggest that no discounting factors be applied, and the tree appraisal value of the most valuable tree species be used, unless the offender can prove otherwise.	This suggestion would require a code amendment. Comment acknowledged and shared with other staff working on tree protection issues.
26	Yes	Tree Value Calculation	Sherry Perkins	It's about time Seattle started enforcing the protection of trees and including their value as a carbon sink.	Changes to the trunk formula would require a code amendment. Comment acknowledged and shared with other staff working on tree protection issues.
27	Yes	Tree Value Calculation	Steve Zemke – Chair of Friends of Seattle's Urban Forest	As to the actual calculation of tree appraisal values, we are not certain why these values do not start at 100% and be adjusted downward based on actual evaluation in the field.	This suggestion would require a code amendment. SDCI needs a consistent approach that multiple inspectors who have varying levels of expertise can use across the entire city when trees are already damaged or removed. Under current code requirements, using a factor adjusted to a more average point is an approach that will help us sustain our penalty system.
28	Yes	Tree Value Calculation	Steve Zemke – Chair of Friends of Seattle's	Consideration should be given to owner's ability to pay.	SDCI has the ability to reduce penalties either as part of a court settlement or by settling before a lawsuit is filed. In those situations, we can take into account factors such as whether a replanting plan has been approved and installed, an owner's ability to pay,

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			Urban Forest		whether the cutting was to increase profits, and other factors.
29	Yes	Tree Value Calculation	Steve Zemke – Chair of Friends of Seattle’s Urban Forest	The tree valuation should also include the effect of trees reducing the heat effects on building, reducing air pollution from high traffic areas or areas with few trees.	Location values can take solar and shading impacts into account. Reducing air pollution is not currently recognized as part of the formula and would require a code amendment.
30	Yes	Tree Value Calculation	Steve Zemke – Chair of Friends of Seattle’s Urban Forest	We think a 100% valuation should be placed on a tree being exceptional tree either individually or in a tree grove.	This suggestion would require a code amendment. SDCI needs a consistent approach that multiple inspectors who have varying levels of expertise can use across the entire city when trees are already damaged or removed. Under current code requirements, using a factor adjusted to a more average point is an approach that will help us sustain our penalty system.
31	Yes	Tree Value Calculation	Steve Zemke – Chair of Friends of Seattle’s Urban Forest	We think that conifers (\$60) should get a higher valuation.	We acknowledge the value of conifers but are required to use a basic tree cost founded on a base price per square inch for conifers or deciduous trees. The final rule has been updated to reflect the regional cost of conifer trees as \$57 per square inch.
32	Yes	Tree Value Calculation	TreePAC	A minimum of 125% ratings should be applied to the tree formula for trees removed or damaged with groves.	This suggestion would require a code amendment. Comment acknowledged and shared with other staff working on tree protection issues.
33	Yes	Tree Value Calculation	TreePAC	A penalty should be assessed for neglected new trees and sabotaged trees.	If new trees are planted as a condition of a land use or building permit approval, SDCI can require those trees to be replanted if we are made aware of the problem. If we gather proof that a protected tree was “sabotaged” we can assess penalties under the existing code.

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34	Yes	Tree Value Calculation	TreePAC	Exceptional trees must result in penalties over the 100% tree rating evaluation. A factor of 1.25 should be applied to removed or damaged exceptional trees.	This suggestion would require a code amendment. Comment acknowledged and shared with other staff working on tree protection issues.
35	Yes	Tree Value Calculation	TreePAC	Heritage trees must result in penalties over the 100% tree rating evaluation. A factor of 3.00 should be applied to removed or damaged heritage trees.	This suggestion would require a code amendment. Comment acknowledged and shared with other staff working on tree protection issues.
36	Yes	Tree Value Calculation	TreePAC	Start with the assumption that 100% value for species rating, condition rating, and location rating and adjust downward if necessary for specific tree or trees being evaluated. The examples in the Director's Rule result in civil penalty amounts that range from 25 to 30% of the basic tree cost. This reduced value is insufficient in discouraging tree removal.	This suggestion would require a code amendment. SDCI needs a consistent approach that multiple inspectors who have varying levels of expertise can use across the entire city when trees are already damaged or removed. Under current code requirements, using a factor adjusted to a more average point is an approach that will help us sustain our penalty system.
37	Yes	Tree Value Calculation	TreePAC	The Director's Rule proposed use of 60% as a default condition value is too low based on a 2013 regional assessment of Seattle Trees.	The final rule increases the default condition rating to 70%.
38	Yes	Tree Value Calculation	TreePAC	The trunk formula does not acknowledge the added value tree bring to urban microclimates within Seattle. The Director's Rule should account for supplemental values of indirect climatic impact.	This suggestion would require a code amendment. Comment acknowledged and shared with other staff working on tree protection issues.
39	Yes	Tree Value Calculation	- TreePAC - Polly Freeman - Plant Amnesty - Brent McFarlane - Sally Jo Gilbert de Vargas	The valuation should include not just the cost of the replacement tree(s), but all installation costs, a showing that replacement site has adequate soil volume and soil characteristics to support the new tree(s), and a three-year maintenance program with bond to assume substitution of the tree(s) in case of non-survival.	The cost of replacement trees found in the Species Rating Guide published by the Pacific Northwest Chapter of the International Society of Arboriculture is based on average costs for both the tree itself and installation costs. Including a maintenance program and/or bond would require a code amendment.

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			- Mary Keeler - Monica Wood - Leia Berg		
40	Yes	Tree Value Calculation	TreePAC	TreePAC does not concur that coniferous trees (\$60) are of less value than deciduous trees (\$72).	We acknowledge the value of conifers but are required to use a basic tree cost founded on a base price per square inch for conifers or deciduous trees. The final rule has been updated to reflect the regional cost of conifer trees as \$57 per square inch.
41	Yes	Tree Value Calculation	TreePAC	A factor between 1.0 and 1.25 should be applied to the tree value for its role in climate management.	This suggestion would require a code amendment. Comment acknowledged and shared with other staff working on tree protection issues.
42	Yes	Tree Value Calculation	TreePAC	A factor between 1.0 and 1.25 is recommended to be applied to the value of a tree in an area with less than average incomes given the proportionate difficulty in remedying the negative pollution effects and resulting health effects due to lack of tree cover canopy.	This suggestion would require a code amendment. Comment acknowledged and shared with other staff working on tree protection issues.
43	Yes	Page 4. B.3 Willful or malicious cutting	Jim Davis	A tree services company should be fined for violations as well as a developer/homeowner.	Tree companies can be cited in notices of violation when we have evidence to implicate them as responsible parties.
44	Yes	Page 4. B.3 Willful or malicious cutting	Jim Davis	Multiple violations of two or more should result in triple damages.	The final rule has been updated to specifically state that a repeat violation is considered willful cutting which may result in a tripling of the penalty amount.
45	Yes	Page 4. B.3 Willful or malicious cutting	Seattle Urban Forest Commission	We support the provision for increased penalties for willful or malicious cutting as proposed and recommend clarifying that this includes building permits as well as development permits.	The final rule has been updated to include specific reference to building permits.



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46	Yes	Page 4. B.3 Willful or malicious cutting	Steve Zemke – Chair of Friends of Seattle’s Urban Forest	A second or multiple violations should result in higher penalties and suspension of their registration with the City and ability to do work in the City.	The final rule has been updated to specifically state that a repeat violation is considered willful cutting which may result in a tripling of the penalty amount.
47	Yes	Page 4. B.3 Willful or malicious cutting	Steve Zemke – Chair of Friends of Seattle’s Urban Forest	When assessing the penalty, the responsibility of tree care providers understanding of Seattle City laws and their responsibility in complying with the laws before commencing work needs to be taken into consideration.	This suggestion would require a code amendment. Comment acknowledged and shared with other staff working on tree protection issues.
48	Yes	Page 4. B.3 Willful or malicious cutting	TreePAC	“View enhancement” is open for interpretation and requires further definition to make an effective and enforceable rule.	Enforcement staff will continue to deal with issues such as this, with assistance when needed from the City Attorney’s office.
49	Yes	Page 4. B.3 Willful or malicious cutting	TreePAC	Misrepresenting City’s policies on tree protection should be subject to a fine. If a tree cutting service advises a client there are no protections for trees on private property, or a client tells a tree cutting service they have a permit when they don’t, defined financial penalties should be imposed.	This suggestion would require a code amendment. Comment acknowledged and shared with other staff working on tree protection issues.
50	Yes	Page 4. B.3 Willful or malicious cutting	TreePAC	Multiple Violations of two or more will result in corresponding higher fines.	The final rule has been updated to specifically state that a repeat violation is considered willful cutting which may result in a tripling of the penalty amount.
51	Yes	Page 4. B.3 Willful or malicious cutting	TreePAC	This rule addresses development proposal, which could be interpreted to exclude willful cutting penalties from homeowners. Expand this section to include penalties to home owners that remove trees	The final rule has been updated to include cutting within six months prior to the closing date on a sale of property as willful cutting.

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				six month prior to closing on the sale of their property.	
52	Yes	Additional information to be included in Director's Rule	- TreePAC Joyce Moty – TreePAC board member	Clarify the tree removal permit requirements under SMC 25.11.100 within this proposed rule.	This rule is limited to clarifying the calculation of penalty amounts. There is no permit requirement in SMC 25.11.100.
53	Yes	Additional information to be included in Director's Rule	TreePAC	Clarify that the Director's Rule also relates to SMC 15.43.020, Street Tree preservation and protection	Section 25.11.030 specifically exempts removal of street trees from the Tree Protection ordinance because street trees are regulated by the Seattle Department of Transportation under SMC Chapter 15.43.
54	Yes	Page 1, Guide to Plant Appraisals	Scott Baker	The Ninth Edition of the Guide to Tree and Plant Appraisal is outdated and, the Tenth Edition will be released this year. This means the rule as drafted will not reflect the current standard.	The code and the rule provide for the use of updated information so that new costs and changes to the formula can be used.
55	Yes	Page 2. A.1.c. Basic Tree Costs	Art Pederson	A.1.c on page 2 of the Director's Rule. Change the second sentence to read: "When information is not sufficient to support using (Remove: "a larger" and replace with "an estimated") diameter, the department will use the minimum regulated diameter in establishing the Basic Tree Cost.	The final rule has been revised to delete specific reference to the minimum regulated diameters of trees. Available evidence will be relied upon when estimates are required.
56	Yes	Page 3, 2.2 Species Rating; 2.3 Condition Rating; 2.4 Location Rating	Ron and Deejah Sherman-Peterson	An aerial survey does not give a very accurate picture of the species or the size or the health of our trees.	SDCI will review all available evidence when reviewing a site to determine the appropriate species, condition and location ratings for trees.

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57	Yes	Page 3, A.2 Species Rating.	Art Pederson	#2 on page 3 (Species Rating) of the Director's Rule. Change the second sentence to read: "If SDCl cannot readily determine the tree species, after reviewing online information, aerial photos, (Include "prior surveys or site plans". These resources can help identify a species. And we include these under "Condition Rating", a place where these two things would be the least likely to give an indication of "condition". However, I don't think there is any harm keeping them #3 (Condition Rating)).	The final rule has been updated to use the same language for the three rating factors.
58	Yes	Page 3. B.1 Hazardous or potentially hazardous trees	Art Pederson	Use of Potentially Hazardous (page 3, B.1 "Hazardous or potentially hazardous tree"). I think "potentially" complicates things/gives a possible violator wiggle room. The code defines "hazardous", so it either is or isn't. All trees can become potentially hazardous by messing with them inappropriately. Then we have an incentive, or out, for someone to create the need to remove and also get around trebling of fines.	The final rule does not include use of the phrase "potentially hazardous."
59	Yes	Page 4. Examples.	Art Pederson	Page 4 of the Director's Rule. Change "EXAMPLES" to "Examples of When the Tree has been Removed Prior to Verifying DSH Measurement" or similar. The point is to clarify that all of the following examples are examples of this situation. One looking for a regular situation example could look through all of these before realizing that there is no "base" or "normal" example. So, I also think it would be good to have an example of a "normal" measurement situation where the tree is there to be measured. That would be a separate hearing of "Example", of course.	Examples have been deleted from the final rule.
60	Yes	Page 4.B.4 Cutting or	Tree PAC	Clarify or expand the defined ECA area to include regulated buffers.	Environmentally critical areas (ECAs) are regulated in a separate chapter of City code, SMC 25.09. The Tree

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		damaging trees in ECAs			Protection ordinance, SMC Chapter 25.11 requires that tree removal in ECAs must comply with SMC 25.09.320. This rule cannot interpret or expand the application of the ECA chapter.
61	Yes	Page 5. Replanting plan to reduce penalty.	Jim Davis	The replanting plan should be developed by a City approved, independent arborist.	Replanting plans are reviewed and approved by qualified SDCI staff.
62	Yes	Page 5. Replanting plan to reduce penalty.	Ron and Deejah Sherman-Peterson	Any system for calculating tree values and providing penalties for their removal must be encouraging planting more trees, rather than administering merely a light slap on the wrist to those killing them.	When trees are illegally cut or damaged, a replanting plan is required.
63	Yes	Page 5. Replanting plan to reduce penalty.	Steve Zemke – Chair of Friends of Seattle’s Urban Forest	Reduction in penalty based on what is replanted either on or off site that is comparable to the loss of the tree or trees.	SDCI has the ability to reduce penalties either as part of a court settlement or by settling before a lawsuit is filed. In those situations, we can take into account factors such as whether a replanting plan has been approved and installed, an owner’s ability to pay, whether the cutting was to increase profits, and other factors.
64	Yes	Page 5. Replanting plan to reduce penalty.	TreePAC Jim Davis	Restoration is also required. The Director’s Rule should be sure not to imply excluding or voiding the requirement of SMC 25.11.100.K relative to “restoration”. Replanting plan should not result in a reduction of the penalty by up to 50%. It should be required in addition to the penalty.	SMC 25.11.100.J requires a restoration plan that results in a site condition that, to the greatest extent practicable, equals the site condition prior to the tree cutting. Replanting plans are reviewed and approved by qualified SDCI staff. SDCI may reduce penalties either as part of a court settlement or by settling before a lawsuit is filed. In those situations, the Department considers factors such as whether a replanting plan has been approved and installed, an owner’s ability to pay, whether the cutting was to increase profits, and other factors.

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65	Yes	Page 5. Replanting plan to reduce penalty.	TreePAC	The replanting plan must be clear in terms of proper remediation of lost trees – including special trees with ECA, Exceptional Tree, and Heritage Trees. The planting plans should result in no net loss of tree dripline and DBH.	SMC 25.11.100.J requires a restoration plan that results in a site condition that, to the greatest extent practicable, equals the site condition prior to the tree cutting. See also section 29.11.090 which requires that a tree replacement and restoration plan for associated development be designed to result, upon maturity, in a canopy cover at least equal to that prior to tree removal.
66	Yes	Tree professional assessing cost	Jim Davis	For strengthen penalties to be successful in protecting our remaining large trees, arborists that are employees of tree services companies or arborist hired by developers should not have the final say on whether a tree or grove trees are considered exceptional or hazardous. There should be fact checking by a City approved, independent arborist.	Currently, the City accepts reports from any certified arborist, but also does spot checking in the field of these reports as time and staffing levels allow.
67	Yes	Tree professional assessing cost	Joyce Moty – TreePAC board member	The director's rule must prescribe substantial fines for illegal tree removals based on the professional arborist assessment.	Comment acknowledged and shared with other staff working on tree protection issues.
68	Yes	Tree professional assessing cost	Scott Baker	If the City dictates that damages will be assessed using appraisal I know from experience that the guilty parties will very likely fight any valuation. They will then hire Attorneys, who will hire appraisers and, the City will find itself spending large sums on legal action arguing over which valuation is correct. Unfortunately, the appraisal methods allow for large differences based on the appraisers judgment or...their desire to please their clients. Given how the civil court system functions, one can see here this will lead. The City will spend heavily on every case.	Comment acknowledged and shared with other staff working on tree protection issues.

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69	Yes	Tree professional assessing cost	TreePAC	Tree value assessment and evaluations are outside the realm of the SDCI's abilities. Instead, judgmental evaluations need to be provided by accredited and registered tree professional. The cost of tree professional would be covered by the party responsible for removing the tree.	This suggestion would require a code amendment. Comment acknowledged and shared with other staff working on tree protection issues.
70	Yes	Tree professional assessing cost	TreePAC	In reference to 25.11.100.I.1 with the use of "appraised value of the trees" (page 1 of Director's Rule). The director's rule appears to lack the definition of "appraiser", but instead attempts to replace the appraisal process with reduced value assumptions relative to a tree's worth.	This rule clarifies how the requirements of the code will be applied in a predictable and consistent manner.
71	No	Arborist Registry	-Sally Jo Gilbert de Vargas -Kimberly Smith -Anna Pedroso -Brent McFarlane -Plant Amnesty -Joyce Moty - TreePAC board member -Mary Keeler -Monica Wood -Leia Berg -Polly Freeman	Require arborist and others cutting down trees to be registered with the City for increased accountability.	This suggestion would require a code amendment. Comment acknowledged and shared with other staff working on tree protection issues.

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72	No	Arborist Registry	Seattle Urban Forest Commission	In reviewing SMC 25.11.100, it appears that SDCI already has the authority to create a tree worker registry. The UFC recommends requiring arborist, tree care providers, and landscape companies to register with the City and participate in tree protection code training. This is an approach similar to the one SDOT currently uses for ROW trees. Such a registry allows tree companies to be informed of current tree laws and ordinances. The registry would become a list of tree service companies that are up-to-date with City's codes that would provide additional support for residents.	This suggestion would require a code amendment. SDCI does not have authority under the current code to require registration or training for arborists, tree care providers, and landscape companies.  Comment acknowledged but not related to the proposed penalty rule.
73	No	Arborist Registry	Steve Zemke – Chair of Friends of Seattle's Urban Forest	We recommend requiring arborists and other tree care people to register with the city as SDOT currently does for tree care providers. This allows them to be informed of current tree laws and ordinances and sign that they agree with city tree policies and regulations, have a Washington State Contractor's license and Seattle business license, and have a certificate of insurance license with Seattle listed as an additional insured. This puts the main responsibility on compliance with Seattle's tree ordinance.	This suggestion would require a code amendment. SDCI does not have authority under the current code to require registration or training for arborists, tree care providers, and landscape companies.  Comment acknowledged and shared with other staff working on tree protection issues.
74	No	Citywide Tree Planting	Brent McFarlane	Create a plan to grow the existing tree canopy to restore what we've lost in the last 40 years.	Comment acknowledged and shared with other staff working on tree protection issues.
75	No	Exceptional Tree Threshold	TreePAC	Modify the thresholds on what makes some trees exceptional. Unfortunately, some species may be over 75-years old, over 24 inches in diameter, and still not considered exceptional.	Comment acknowledged and shared with other staff working on tree protection issues.
76	No	Incentives	Brent McFarlane	Incentivize more tree planting on public and private lands.	Comment acknowledged and shared with other staff working on tree protection issues.

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77	No	Incentives	TreePAC	Have incentives available for homeowners and developers to maintain their mature and newly planted trees. Examine what other cities have done to provide incentives to homeowners and developers to maintain mature and new planted trees.	Comment acknowledged and shared with other staff working on tree protection issues.
78	No	Moratorium of tree removal	TreePAC	Implement a moratorium on cutting down mature trees except if they are proven hazardous by an independent (with no conflict of interest) City authorized arborist.	Comment acknowledged and shared with other staff working on tree protection issues.
79	No	Tree Code	Jim Eachus	I understand you are considering new rules or guidelines regarding tree removal in the City of Seattle. I want to encourage you to choose the strictest possible rules.	Comment acknowledged and shared with other staff working on tree protection issues.
80	No	Tree Code	Ron and Deejah Sherman-Peterson	This plan does not encourage the retention of large mature trees, instead it allows for easily discarding up to three trees every year.	Comment acknowledged and shared with other staff working on tree protection issues.
81	No	Tree Code	-Sally Jo Gilbert de Vargas -TreePAC -Plant Amnesty -Mary Keeler -Monica Wood -Leia Berg -Polly Freeman -Brent McFarlane	Establish a no-more-net-loss of tree canopy basis for requiring tree replacements of significant or exceptional tree removed including during property development.	Comment acknowledged and shared with other staff working on tree protection issues.



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			-Anna Pedroso		
82	No	Tree Code	TreePAC	Coordinate the definition of "damage" as it a bit different and includes vegetation (SMC 15.43.020, Street Trees preservation and protection) and SMC 25.11.	Comment acknowledged and shared with other staff working on tree protection issues.
83	No	Tree Code	TreePAC	There should be more consistency across the City departments relative tree protection measures.	Comment acknowledged and shared with other staff working on tree protection issues.
84	No	Tree penalty money: Use for environmental restoration	Michaela Wehner	The money thus acquired by the penalty be used by the City to support environmental restoration.	Comment acknowledged and shared with other staff working on tree protection issues.
85	No	Tree penalty money: Use to hire more inspectors	Jim Davis	A portion of the penalties collected should be designated to fund an adequate number of inspectors to enforce the tree ordinance.	Comment acknowledged and shared with other staff working on tree protection issues.
86	No	Tree Permit	-Brent McFarlane -Sally Jo Gilbert de Vargas -Mary Keeler -Monica Wood -Leia Berg	Require permits for tree removal on both public and private land so we can keep better track of tree loss and gain. Require posting of permit for two weeks like SDOT does.	Comment acknowledged and shared with other staff working on tree protection issues.

#	Directly related to Draft Rule 21-2017	Topic	Who	Comment	Response
			-Polly Freeman -Jim Davis -Anna Pedroso -Plant Amnesty -Kimberly Smith		
87	No	Tree Permit	Elizabeth Brown	I recently learned Seattle was considering new regulations that would require a permit to cut down a mature tree. I urge you to do whatever you can to preserve as much of our tree cover as you possibly can.	Comment acknowledged and shared with other staff working on tree protection issues.
88	No	Tree Permit	-Joyce Moty – TreePAC board member  -Tree PAC	SDCI must change from a complaint system to a permit system to address removal of trees. The SDCI must exercise their right to utilize a permit process for tree removal (similar to SDOT)	Comment acknowledged and shared with other staff working on tree protection issues.
89	No	Tree Permit	Michaela Wehner	I am writing to ask the City to act to support, maintain, and enforce the tree cutting ordinance which requires property owners to obtain a permit prior to cutting down trees on their property.	Comment acknowledged and shared with other staff working on tree protection issues.
90	No	Tree Permit	Plant Amnesty	Require hired arborist to verify permit before beginning work. Require posting of permit for two weeks – mirroring SDOT rules.	Comment acknowledged and shared with other staff working on tree protection issues.
91	No	Tree Permit	Seattle Urban Forest Commission	In reviewing SMC 25.11.100, it appears that SDCI already has the authority to expand its current hazardous tree permit to include all tree-related activities. A complete tree removal permit system would help the City better monitor tree removals citywide and help plan accordingly in order to meet	Comment acknowledged and shared with other staff working on tree protection issues.

#	Directly related to Draft Rule 21-2017	Topic	Who	Comment	Response
				the Urban Forest Stewardship goals. A better system to protect trees than under the existing ordinance and regulations is to require the use of a permit system for all trees over 6-inches in diameter. This provides a check on possible removal or more than three non-exceptional significant trees greater than 6 inches in diameter each year, and provides confirmation as to whether a tree is Exceptional or not. No having a permit requirement for all trees allows exceptional trees to be removed without verification before they are cut.	
92	No	Tree Permit	Steve Zemke – Chair of Friends of Seattle’s Urban Forest	Require a permit for removal of all trees over 6-inches in diameter. With a permit based system, tree removal prior to development can be monitored which will reduce the number of violations. This provides a check on the possible removal of more than three significant trees a year than are not exceptional. This will reduce the number of exceptional trees being cut by providing confirmation as to whether a tree is exceptional or not before they are cut down. A comprehensive permit system would allow more careful and timely consideration of exceptional trees removed as hazard trees before they cut rather than trying to determine this after they are cut. A permit requirement for all trees will significantly reduce exceptional trees being removed with verification.	Comment acknowledged and shared with other staff working on tree protection issues.