

**DRAFT**  
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The Urban Forestry Commission (UFC) thanks Chair Strauss and other members of Seattle City Council's Land Use Committee for their attention to tree service provider registration.

The UFC has reviewed the proposed amendments to the Tree Service Provider Registration ordinance and offers the following remarks:

1. The UFC urges the Council to seriously consider the definition of "Hedge." By the City's own canopy assessment methods, any vegetation greater than eight feet high is considered tree canopy. Most hedges are therefore contributing to our City's canopy cover, and many are composed of native conifer species that provide exceptional ecosystem services and important urban wildlife habitat. For example, one hedge known to a commissioner in the Capitol Hill neighborhood, one block north of Cal Anderson Park, is composed of ten Western Redcedars.

The UFC understands that hedge trees serve a particular function and regular pruning or shearing is required, but given the state and trends of our urban forest, removal of hedge trees, if they are significant, merit the same protections as other trees contributing to our canopy.

2. The UFC recommends maintaining the current definition of "Major Pruning." The proposed change would consider removal of up to 25% of a tree's foliage bearing area as minor. According to ANSI pruning standards, removing more than 25% of a tree's foliage in a year would be contrary to best practice. Anything above 15% should be major pruning, and anything over 25% in a year would be excessive.

Maintaining the current definition also ensures consistency of our code. For example, permits are required when adjacent property owners wish to prune more than 15% of a street tree's canopy under SMC 15.43.030.

3. The UFC urges the Council to maintain a public notice posting requirement. The commission acknowledges the weaknesses of the current, on-site public notice requirements, namely that it creates additional travel requirements for tree service providers, which increases traffic and carbon emissions, and can cause difficulties when tree work needs to be delayed or rescheduled.

But since enforcement of our urban forest protection code relies on community complaints, public notice of legitimate tree work is important. The UFC urges the Council to create an online public notice system. Require tree service providers to provide notice of commercial tree work two weeks in advance on an online system. This

will also help the City collect important data that can inform future management decisions.

Sincerely,