

CITY OF CLAREMONT TREE POLICIES AND GUIDELINES MANUAL REVISION

Public Comment Log 3 [December 2024]

Introduction

Dudek worked with the City of Claremont (City) to revise the City's Tree Policies and Guidelines Manual (Manual). The Manual revision ensures alignment with arboricultural Best Managements Practices (BMPs) and urban forestry industry standards, while helping to address community concerns regarding implementation of policies and transparency to the community. **Tables 1-4** summarize the input received throughout project development and are separated based on the timeframe in which input was received. Input received at project initiation up to the Public Comment period are captured in **Table 1**, **Table 2** details the comments received through the Public Comment process, **Table 3** captures comment received after the Public Comment process but prior to **Table 4**, which captures comments received at a community meeting in September 2024. Each table includes a response and if appropriate, a 'revision location' to help easily identify where in the revised draft Manual, the revision can be found. The 'revision location' notes a page number, section title, or paragraph number of the revision reflective of the draft. Public Input received that identify a community concern that is not within the scope of the Manual Revision project, will be brought to City Leadership and Elected Officials at the close of this project. At this time, staff will receive direction from Council on how to address the remaining urban forestry concerns of the community.

Table 1: Community Input – September 2023 – June 2024

The community input process included one (1) Sustainability Committee meeting, three (3) in-person community meetings, individual discussions with community members via phone call or email, and a thorough review of the "2023 Tree Policy Guidelines Manual Review – Community Recommendations" PowerPoint (**Table 1**.) The PowerPoint was shared with the consultant team to inform them of overall urban forestry community concerns at project initiation. All public input received from September 2023 – June 2024 is below.

#	Revision Location	Comment	Response
1-1.	No Revision.	The City should only take direct action in cases of hazardous, dead, and trees where emergency or public safety concern exists.	Comment received. Public safety concern is the primary reason for tree removals.
1-2.	Page 32 Hazardous Tree Inspection; Pages 33 – 38 Non-Emergency Removals	Disease, building damage, hardscape/infrastructure damage and infrastructure conflict should be assessed by a Tree Risk Assessment Qualified Certified Arborist using Level 2 and 3 risk assessments. Recommendations and risk assessment reports should be brought to a Tree Committee for tree removal review and approval or denial.	Comment received. The differentiation between tree health assessment and tree risk assessment was clarified in the project progress document previously distributed as part of this project.

#	Revision Location	Comment	Response
1-3.	Page 27 Tree Care for Birds and Other Wildlife	Trimming schedules should be created such that no tree trimming is to occur during nesting season defined as March 1 through July 31.	Comment received. Revision includes guideline aligning with the Western Chapter ISA Tree Care for Birds and Wildlife Best Management Practices.
1-4.	Page 27 Tree Care for Birds and Other Wildlife	Outside of these dates all trees should be pre-inspected for nests by a wildlife trained arborist (high value habitat) or tree worker with awareness training (low value habitat) as is recommended in the Tree Care for Birds & Other Wildlife Best Management Practices in California document.	Comment received. Manual revision includes guideline to follow the Western Chapter ISA Tree Care for Birds and Wildlife Best Management Practices.
1-5.	Page 27 Tree Care for Birds and Other Wildlife	Regular reports should be given to provide information about pre-inspections and any avian disturbances during trimming periods that documents by raptor and non-raptor as well as disposition – nest replaced, birds sent to shelter, etc.	Comment received. Manual revised to include reporting procedures for avian disturbances.
1-6.	No Revision.	Tree Committee meetings should be scheduled monthly/bimonthly at minimum and not regularly canceled.	Comment received.
1-7.	Page 37 Exhibit 4	Tree removals reports to the Tree Committee should be current and show photo documentation of ALL trees removed before and after.	Comment received. Manual revision includes documentation requirements for non-emergency tree removals.
1-8.	Page 34 Excessive/Reoccurring Property Damage	Tree valuations should be accurately tabulated and represented using current best practices for tree valuation (not just replacement value).	Comment received.
1-9.	No Revision.	Community and Human Services Commission should request of City Council and Manager adequate funding for both staffing expertise and levels.	Comment received.
1-10.	No Revision.	City should demonstrate and communicate Return on Investment to justify appropriate funding for the implementation of our Tree Policy Guidelines/Urban Forest Management Plan.	Comment received.
1-11.	No Revision.	The City should explore shifting urban forest planning and enforcement responsibilities to the Community Development Department. While the physical planting, care and maintenance of City owned trees requires Community Services Department expertise, planning decisions (including those on private property) should be made by staff with planning expertise. Ensuring enforcement would also be the jurisdiction of the Community Development Department.	Comment received.
1-12.	No Revision.	The Community Development Department should develop a Private Property Tree Protection Ordinance requiring permitting and replacement (mitigation) for tree removals based on size/species. The Department should also revise and implements a City Heritage Tree Program. Both are common in other cities.	Comment received. The Heritage Tree program section was retained and the City is committed to continuing this program. The Manual provides a Heritage Tree and Historic Grove List as Appendix B. Development of a Private

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			Property Tree Protection Ordinance is beyond the scope of this project.
1-13.	No Revision.	The Community Development Department should implement an ordinance requiring the permitting of pruning of private trees in Commercial and Multifamily properties to protect against hazardous “Topping and Lion Tailing”. Cost recovery permitting fees may be required.	Comment received. See response to comment Table 1 – 12. . Both ‘Topping’ and ‘Lion Tailing’ are listed as prohibited pruning practices within the Manual.
1-14.	No Revision.	The City Community Services and Community Development Departments should jointly work to fund, focus, and report on tasks required to meet the 2020-2025 objectives in the Urban Forest Master Plan.	Comment received. The UFMP lists the Community Development Department as a collaborator on goals benefiting from collaboration.
1-15.	No Revision.	A Commission that has members with environmental expertise should be created that includes a Tree Committee. Another option is that Sustainability Committee could become a Commission with this responsibility. There is precedence as Claremont has had both a Tree/Parkway Commission and Environmental Quality Commission in the past. South Pasadena has a good model with their Natural Resources and Environment Commission.	Comment Received. Addressing the Committee and Commission operational structure is beyond this project’s scope.

Table 2: Public Comment

After an initial Manual revision draft was developed, the Manual was open for Public Comment from June 3, 2024, to July 8, 2024. **Table 2** displays the comments sent to UFMP@dudek.com during the Public Comment period, with a total of 60 comments.

Comment Number	Revision Location	Comment	Response
2-1.	Page 3 – Statement of Commitment Paragraph 4	Page 3, paragraph 4 - add: “and there is no reasonable alternative to resolving the conflict.”	Comment received and text amended.
2-2.	Removed from narrative	Page 3 – paragraph 5 – The paragraph states that a city tree in conflict with infrastructure it will be removed if among other conditions, the costs of infrastructure repair is “greater than the economic value of the tree.” It is not clear on what basis or by whom the economic value of the tree is determined. Further, trees have more than	Comment received and addressed. Economic value no longer mentioned in this passage since natural resources

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		<p>economic value to the community. How much greater does the cost be to justify removal? I find this to be unacceptable. If it is retained, the “economic value of the tree”, costs of alternatives, and an estimate of repair cost are factors that must be included in the documentation. This seems also to be in conflict with the statement on page 5 – Following Guiding Principles “Trees of our urban forest are more than aesthetic enhancements and shall be cared for as a community asset.”</p> <p>Every decision to remove a community tree must be documented in writing using the Proposed Tree Removal Form (sample provided as last page of this document) and available to the public.</p>	<p>transcend western society means of quantifying value.</p>
2-3.	Page 4 Tree Policies and Guidelines Manual	Page 5 – paragraph 3 - replace “should” with “shall” in the next to last sentence. The last sentence in the paragraph is vague. What is the meaning of “underlying intent”?	Comment received. “Should” changed to “shall”. Last sentence removed.
2-4.	No Revision	Page 7 – Second paragraph under The Community and Human Services Commission. The committee would be most effective if its members are familiar with the principles of tree management. If such people are not found in the members of the commission, membership should be opened to a broader group of candidates.	Comment received. The Community and Human Services Commission and Tree Committee selection process is directed by Municipal Code 12.06.020
2-5.	Page 7 The Community Services Department Paragraph 1	Page 8 – paragraph 1 - It is not clear what is meant by “community – facing educational materials”?	Comment received. Language clarified.
2-6.	Page 17 Nursery Stock Standards Bullet 1	Page 16 – First paragraph under Nursery Stock Standards - All nursery stock shall be inspected by an ISA certified arborist employed by the city of Claremont prior to planting for adherence to the standards described in this document.	Comment received. Manual revised to require ISA Certified arborist employed by the city to inspect nursery stock before purchase.
2-7.	No Revision	Page 17 – paragraph after Wood Chip Mulch (and also on page 19) - Having mulch against the trunk has not been found to be harmful according to career-long research by Dr. James Downer of UC Extension.	Comment received. Although Dr. Downer has shared this finding publicly, the Manual revision aligns with ISA Best Management Practices which are not yet revised to state this finding.

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2-8.	Page 18 Tree Planting Specifications Paragraph 6; Page 20 Watering Schedule Paragraph 2, 3, 4, 5, 6; Page 21 Bulleted List	Page 21 – There is nothing to tell the homeowner how often to irrigate newly planted trees, just that it should be frequent. This is open to interpretation and needs to be more specific. Nore is there anything about weather conditions or time of year. There is nothing about how long it takes newly planted trees to become independent of applications to the root ball.	Comment received. Watering frequency and amount updated, as well as seasonal considerations aligning with arboricultural best management practices.
2-9.	Page 20 Watering Schedule Paragraph 6, 7; Page 22 Watering Established Trees Bullet 1, 2, 3, 4	Page 21 – first line on the page - the sentence should read “deliver at least 15 gallons.” This seems excessive for a 15-gallon tree. Add a statement that the water must wet the root ball.	Comment received. Watering quantity amended to arboricultural best management practices. Language added to discuss saturation of the root ball.
2-10.	Page 23 Pruning Paragraph 2, 3, 4, 5; Page 24 – 25 Pruning Mature Trees Bullet 3	Page 24 – In the discussion of Crown Thinning. This pruning specification has been removed from the ANSI A300 2017 standard for pruning. The ANSI Standard noted that the term is frequently misunderstood and is often used to justify poor pruning practices such as lion tailing. The term “thin” remains in the standard but not as a general specification. It may apply to parts of a tree which appear to be too dense, but its use should be rare and limited to specific individual trees and circumstances. It seems to me that crown raising should be included in this section but that it should be limited to preserving pedestrian and vehicle access.	Comment received. Thinning is specified as a pruning technique used only when achieving a specific management objective. Crown raising was added as a pruning method and guidelines for visibility clearance and utility clearance were moved within the section to follow ‘crown raising.’
2-11.	Page 28 Hardscape Paragraph 1	Page 27 – paragraph labeled “Hardscape” – should read “The City will consider and document all options...” See comments on Page 4 paragraph 5.	Comment received. “And document” added.
2-12.	Page 28 Hardscape Bullet 2	Page 28 – paragraph following Root Shaving - should read “the bottom of the new hardscape.”	Comment received. Text amended.

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2-13.	Page 29 Preventing Spread of Disease	Page 28 – paragraph following Preventing the Spread of Disease - There are very few pathogens that can be spread by pruning tools. The pathogen that causes Fusarium wilt of Canary Island palms is the major problem requiring tool sterilization. Otherwise, it is unnecessary. The section also raises the issue of disposal of waste from “diseased” trees. Special treatment should be necessary only when the nature of the disease has been established and the pathogen is known to spread on prunings. It is incorrect to identify a declining tree as diseased without a credible diagnosis. A description of the condition of the tree should be sufficient. Consider also that there are many causes of tree decline that are not related to pathogens or insects.	Comment received. Text amended to specify that these guidelines should be followed only if a tree is identified with a disease that necessitates sterilization of tools or treatment of debris prior to disposal.
2-14.	Page 31 Removal Paragraph 2	Page 29 – second paragraph following Removal - consider and document all feasible mitigation options...	Comment received. “And document” added.
2-15.	Page 30 Removal Paragraph 3	Page 29 – second paragraph following Removal - replanting the same or larger stature tree is an unacceptable expense and would likely require major infrastructure repair.	Comment received. Text amended.
2-16.	Page 34 – 38 detail the operational process for ‘Non-Emergency Removals’ (formerly ‘Standard Removal’)	Page 29 – second paragraph following Removal – The meaning of “standard removal” is not clear. The different public notification requirements referred to should be listed here.	Comment received. Notification procedure for ‘standard/non-emergency’ removals follows the description of non-emergency removals. Format of Manual was revised to provide clarity.
2-17.	Page 31 Emergency Removals	Page 29 paragraph following Emergency Removals – Should read: ... “a threat to public safety due to a hazardous condition and its sensitive location.”	Comment received. Text amended.
2-18.	‘Timely Removal’ category was removed	Page 29 paragraph following Emergency Removals - The meaning of “Timely” removal” is not at all clear. If it isn’t an emergency removal, is it a “non-emergency removal?”	Comment received. Text amended.
2-19.	Page 32 Hazardous	Page 29 paragraph following Emergency Removals - The TRAQ process does NOT designate trees as “hazardous”. The process assesses the level of risk the tree presents, and a manager determines the level of risk that is tolerable.	Comment received. Text amended.

Comment Number	Revision Location	Comment	Response
	Trees Inspection		
2-20.	Page 32 Hazardous Trees Inspection	Page 29 paragraph following Emergency Removals - It is not adequate for a certified arborist to conduct risk assessments using the TRAQ program. The assessment must be performed by a Qualified TRAQ assessor, as is required on page 30.	Comment received. Text amended.
2-21.	No Revision.	Page 30 Paragraph following Dead/Severely Declining Trees. The removal of a tree that is harboring an exotic pest or pathogen that is a threat to the urban forest is reasonable but should be extremely rare.	Comment received.
2-22.	Removed	Page 30 paragraph following Timely Removals – This paragraph should be removed – the material is covered in the paragraph under “Hazardous Trees. There is no distinction between healthy and unhealthy trees in risk assessment.	Comment received. Text amended.
2-23.	Removed	Page 31 paragraph following Public Safety - It is not clear how the removals identified as for “public safety” differs from the list of removals considered permissible on page 30 or under the paragraph dealing with Hazardous Trees.	Comment received. Text amended.
2-24.	Page 31 – 33 Emergency Removals; Page 34 – 38 Non-Emergency Removals	Page 31 Paragraph following Notification Procedures for Emergency Removals – This entire section and Exhibit 1 seem garbled. It should read Public Notification Requirements for Tree Removals. It should then list notification requirements for “Non-Emergency Removals” and state that “No public notification is required for emergency removals.” All removals should be documented with the reason risk is elevated unacceptably and what remediations are rejected. Documentation should be available to the public. Notification for non-emergency removals should be covered in this paragraph. On page 35 that the notification period for non-emergency removals is 15 days. If it is not an emergency, the period should be extended to 30 days following presentation to the Tree Committee at a public meeting.	Comment received. Tree removal information has been clarified, and required supplemental documentation is included. Format was revised for clarity. Response period for ‘Non-Emergency Removals’ was retained as 15-days, however, automating notification methods of ‘Non-Emergency Removals’ will be implemented as a result of this Manual Revision.
2-25.	Revised throughout	Page 31 Paragraph following Standard Removals – change “standard removals” to “Non-Emergency Removals.”	Comment received. Text amended.
2-26.	Page 33 Non-Emergency Removals Paragraph 2	Page 31 Paragraph following Diseased/Insect Infested Trees – The word “Diseased” has no meaning. Tree decline is common, but a definitive diagnosis of a pathogen is rare and there are many reasons why a tree may be in decline without any important pathogen being present. It should be sufficient to describe the tree as being in “advanced decline” unless the cause is known. It could then be removed as a risk to public safety.	Comment received. Text amended.

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2-27.	Page 34 Hardscape/Inf rastructure/ Building Damage	Page 31 Paragraph following Hardscape/Infrastructure/Building Damage – I suggest removing the word “health”. It is very difficult to assess how much root pruning causes sufficient injury to affect tree health. The threat generally is not to tree health, but to tree stability. It should also state that tree removal is considered after all mitigation measures have been considered and documented.	Comment received. Text amended.
2-28.	Exhibits revised throughout	Pages 33 and 34 are unreadable in the downloaded document.	Comment received.
2-29.	Revised throughout	Page 35 Paragraph following Standard Removals - As mentioned earlier, “Standard” should be replaced with “non-emergency.”	Comment received. Text amended.
2-30.	Page 37 Exhibit 4	Page 35 following item 4a and 4b in exhibit 4 – It is not clear who incurs the additional costs.	Comment received. Costs clarified.
2-31.	Page 38	Page 36 following Programmed Tree Removal –This section seems to justify the 2021 initiative to remove all of certain species of trees that resulted in the process to review the Tree Policy and Guidelines Manual. I don’t understand why tree removals under this paragraph are not covered under Non-emergency removals.	Comment received. Section moved to Non-Emergency Removals.
2-32.	Page 47	Page 45 Paragraph following Raised Grades– The ISA BMP for Soil Management, Second Edition states on page 43 that “research has found little benefit from vertical mulching”.	Comment received. Narrative clarified to note nuance.
2-33.	Removed	Page 46 Paragraph following Diseased Tree in the glossary – Many conditions can cause “a deviation in normal functioning that are not associated with a pathogen. Without a differential diagnosis of a pathogen, the conclusion that the tree is “diseased” is inappropriate and can be misused. I suggest removing this from the glossary.	Comment received.
2-34.	Glossary	I suggest adding Programmed Removal (but I am suspicious of this category!), Emergency Removal and Non-emergency Removal to the glossary.	Comment received. Emergency and Non-Emergency Removal added. Programmed Removal was redefined as Proactive Removal and Replacement.
2-35.	Page 33 paragraph 1; Page 37 Notification Procedure	The policy manual needs to contain a description of the contents of periodic reports of tree removals (quarterly reports?) to the tree committee. The categories of removals reported must be consistent with the categories listed in this manual.	Comment received. Text amended in Notification Procedures for Emergency and Non-Emergency Removals.

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2-36.	Required documentation of removals is noted and Standard Forms are being reviewed for implementation.	To document removals, the revised manual should contain a standard form that describes subject trees, the condition that make removal advisable, and the reasons for rejecting possible alternatives to removal. This manual should indicate how long the forms are to be retained and where the public can have access to the them. Documentation and public access are essential. An example of such a form is on the last page of this critique.	Comment received.
2-37.	Categories condensed to 'Emergency Removals' and 'Non-Emergency Removals' throughout	There are far too many categories of tree removals described in the Manual. I noted the following: <ul style="list-style-type: none"> • Programmed removals • Standard removals • Emergency removals • Timely removals None of these are included in the glossary. I recommend simplifying it to two categories, Emergency Removals and Non-emergency Removals.	Comment received. Manual revised to include two categories – Emergency and Non-Emergency. Format was changed to clarify that the remaining subcategories are intended to thoroughly encapsulate all qualifying reasons for tree removals. Definitions added to glossary.
2-38.	Page 37 Exhibit 4	The use of consulting services offered by companies that contract with the City to perform physical arboriculture services invites a conflict of interest and must be avoided.	Comment received. Text modified to clarify that third-party arborist assessment shall occur from a third-party that is not the contracted party for tree removal services at the time of assessment.
2-39.	No Revision	Public disclosure of impending tree actions being of the utmost importance, I have a proposed form on the last page of these comments.	Comment received.
2-40.	No Revision	For the City to ask for public input during its many community meetings and then focus on City liability and safety concerns in its draft changes to the document, leaves many of us feeling that the Community Services Department has been disingenuous about their desire for robust public input. While the summary of changes captures the reason for proposed changes, it doesn't share what the changes to the text are. Excluding the exact changes to the text requires the public to compare the draft with the current document to find what	Comment received. A public meeting will be scheduled after the public comment period. The original schedule was modified in response to community input.

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		<p>changes were made. To do so in a timely manner would require software. Most community members won't make this effort, yet public input on these changes is essential for real improvement and buy-in.</p> <p>To this end, I request that the City provide a redlined copy of the manual so we can see the exact language that is being proposed to be changed, schedule a public meeting to discuss the impetus for these changes and the reason for not taking into account the many community recommendations, and provide additional time for a more thorough review and public comment.</p>	
2-41.	Page 34 - 38 Non-Emergency Removals	The revised final Draft Tree Policies and Guidelines Manual does nothing to address the urban forest management and tree care implementation and process issues that provoked the City's hiring of a consultant to revise the manual.	Comment received. The Manual revisions include an enhancement of communication processes for non-emergency tree removals and a decision-making framework to ensure a systematic assessment is used to determine if a tree is vigorous enough to recover from root pruning while maintaining an acceptable amount of risk.
2-42.	Page 37 Non-Emergency Removals details enhanced communication procedure	<p>Specific to this public comment period, and what will likely be a dearth of comments—which does not reflect the level of community concern for and support for our urban forest—it should be noted that there has been no general notification announcing the existence and availability of the final draft or regarding the public comment period.</p> <p>Now, the first draft to which the public has access or input is already the final draft, so not motivating to community engagement.</p> <p>A few people were informed about the draft and public comment period in an email, in response to a group letter they submitted to Jeremy Swan. But there was no notice sent to the Community Services urban forest/tree interested parties list (I am on the list, have been very active and vocal, and I received no notice of the posting of the draft or the public comment period.), no notice in the local papers, no notice on the City website except on the Trees page that is not evident that it even exists from the home page. The only mention was Page 2 of the 6/6/24 City Manager's weekly report, not even included in its contents list on its page 1.</p>	<p>Comment received. The Public Comment version of the Manual revision is a final 'draft' and is not a finalized document. Edits are typically anticipated to occur after a Public Comment process. The Public Comment period included the following notification methods:</p> <ul style="list-style-type: none"> - Two emails to the interested parties email group - Announced at a City Council meeting by the City Manager - Included in the City Manager's Weekly report <p>This Manual is considered an internal policy and guidelines document and</p>

Comment Number	Revision Location	Comment	Response
			does not follow the same communication protocol as other City efforts that are announced using social media such as a housing element or General Plan process.
2-43.	No Revision	The final draft was not presented as an agenda item to the Sustainability Committee or the Community and Human Services Commission, whose meeting instead was cancelled for "lack of business."	Comment received. The Manual revision is scheduled to be presented at the Sustainability Committee and the Human Services Commission after the public review process.
2-44.	No Revision	The Community Services process throughout has ignored, trivialized and/or misrepresented the concerns raised by the public at meetings in oral and written public comments, and in discussions and written communications directly with staff. And obfuscated about the actual original source of this effort, the recommendation by Jeremy Swan, dated 2/13/23, of mass tree removals of three species, Italian Stone Pine, Red Ironbark Eucalyptus, and Canary Island Pine, based on a level one assessment by West Coast Arborists, the City's contracted tree care company. linked here: https://drive.google.com/file/d/1ZfauCfI52q_05hfsEAnkMX0Is09xKJAo/view	Comment received. The plan referenced in this comment is no longer being considered for implementation. The Manual review was directed by Council as a response to ensure tree maintenance practices meet arboriculture best management practices.
2-45.	Page 33 - 38 Non-Emergency Removals	It's not that the small proposed changes in the draft Manual might not improve the process, but that the existing version of the manual already contained enough information to prevent Jeremy Swan's previously proposed mass removals of Italian Stone Pine, Red Ironbark Eucalyptus, and Canary Island Pine (and withdrawn after public outcry and the critique of both the rationale and data by Dr. Fred Roth, PhD, ISA arborist certification WE161,SAF Certified Urban Forester, ISA Qualified Tree Risk Assessor). linked here: https://drive.google.com/file/d/1LVJc1qTckC8QZAQ_IRyHk8NgT2r7udl4/view	Comment received. The Manual revision enhanced transparency and documentation of assessments for each non-emergency tree removal and added additional methods for third-party assessment of trees.
2-46.	No Revision	The problem has been— and is—with our process and implementation of the already excellent and visionary adopted policies of the City's Urban Forest Management Plan, Tree Policies and Guidelines Manual, and related General Plan Goals and Policies— all of which provide for what should and could be an authentically robust and wise stewardship of our urban forest and protection of its contributions to our community.	Comment received. The Community Services Department work plan for the next two fiscal years includes review of UFMP recommendations to identify items addressed since UFMP development

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2-47.	No Revision	The revised manual still limits all decision making to the Community Service department and staff (and Engineering Dept. regarding sidewalk interface), with no oversight or shared input or recommendation from Community Development Department, which is responsible for implementation of numerous General Plan Goals and Policies listed in the manual, or Sustainability Committee, or any agency outside of the Community Services Department.	Comment received. Items identified for collaboration between various departments are identified in the UFMP.
2-48.	No Revision	The Tree Committee, especially since it is a subcommittee of community members drawn to the Community and Human Services Commission, has no expertise or meaningful role, only receiving and approving reports and recommendations of staff, whose focus is sidewalk and street maintenance and risk avoidance— and from whose perspective, it is true and efficient that by removing the tree, they protect the sidewalk and access to it— and not messy (a cause cited in JSwan’s 2/13/23 recommended removals), no falling limbs or private property damage, etc. No tree= no more problem.	Comment received. The responsibility of oversight of the Sustainability Committee was moved to the Community Services Department in 2019 to address capacity of each department.
2-49.	No Revision	The draft does not reflect the recommendations of the City’s adopted Urban Forest Management Plan, including inter-departmental input and decision making, and which cites the numerous goals and policies beyond sidewalk management that are required for tree care in the context of urban forest stewardship.	Comment received. The Manual is intended to be a policy and guideline document for internal operation processes.
2-50.	Page 37 Exhibit 4	According to the draft, the decisions will be by a City arborist or outside arborist, which therefore could be just the City’s own contracted tree management company, West Coast Arborists— without addressing the community’s first concern that the West Coast Arborists both recommends re tree removal and benefits as it is contracted to do the removals, usually provides replacement trees from its own nursery and sells the harvested wood from removals. That potential conflict of interest has been a concern from the beginning.	Comment received. Text modified to clarify that third-party arborist assessment shall occur from a third-party that is not the contracted party for tree removal services at the time of assessment.
2-51.	Page 37 Exhibit 4	The manual should address how to have qualified opinion beyond what is called for in current draft, in which analysis and recommendations potentially can all be made by the City arborist (with entry level certification) or arborists from the same contractor who benefits from removals— with no requirement for a third party outside consultant.	Comment received. The objection process of tree removals requires a third-party consultant for non-emergency removals. This was further clarified to show the third-party shall not be the contracted party for tree removal services at the time of assessment.

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2-52.	No Revision	Claremont’s Community Services Department used to, but does not, include an qualified and experienced urban forester or any staff whose background is in urban forest municipal management. This should be accounted and compensated for by requiring outside expert opinion and multiple party sign-off before the fact, not just an accounting of already removed trees.	Comment received. The City has two ISA Certified Arborists on staff. Budget has been allocated to allow staff to obtain the ISA Tree Risk Assessment Qualification. However, urban forester education programs or credentialing programs are uncommon among the industry and would require higher education.
2-53.	Page 37 Exhibit 4	<p>The Tree Committee is the only citizen body to have any input into the tree care. Their input should be prior to the fact of removals, not just accounting after.</p> <p>There is no way for a citizen of Claremont whose passion and/or expertise is for trees and our urban forest to apply and serve directly on the Tree Committee— only by serving on the Community and Human Services Commission. Those who serve on the Tree Committee are there because of their interest and efforts as commissioners re community and/or human services.</p> <p>The tree committee members are assigned from the Community and Human Services Commission, expertise or central interest in trees or urban forest— or even attendant concerns of sustainability, ecosystem (birds, etc), or community development— neighborhood character and design, etc.</p> <p>The manual should address the need for a Tree Committee of those who are qualified and highly interested in serving regarding trees/urban forest.</p>	<p>Comment received. The proposed revision contains an enhanced communication procedure and documentation for each proposed non-emergency removal.</p> <p>The Tree Committee selection process is directed by Municipal Code 12.06.020</p>
2-54.	No Revision	The draft Manual prioritizes ADA requirements for sidewalk access, which is not just legally required but an important community value. But the process is not spelled out well enough to provoke creative solutions that protect trees as much as possible from undue trimming of branches or roots or from removal. Who has the circumspect insight and creativity, especially in the absence of input from the Community Development Department, including planning and architecture staff and commissions.	Comment received. Developing a process to innovate creative and collaborative solutions are not within the framework of the Manual.
2-55.	Page 34 Excessive/ Reoccurring	The draft Manual asserts trees can be removed if the value of repair and maintenance exceeds that value of the tree. Every point I have raised in my comments above apply to my concern regarding this criterion/protocol. Who determines the alleged value of the tree, beyond the Community Services Department	Comment received. Text amended.

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	Property Damage	<p>and West Coast Arborists/ How is value determined regarding the trees' contribution to ecosystem, shade, cooling, beauty, neighborhood character, historic preservation, the added property value to the surrounding private properties, etc?</p> <p>And just because it costs more to maintain than to remove a tree should not in itself be justification for removal. What about the economic and environmental cost to the community from the years of lost value of the removed tree while a replacement sapling tree matures enough to have comparable value to the tree that is removed?</p>	
2-56.	No Revision.	The draft Manual does not address the process, implementation and oversight shortcomings that define our current status of tree/urban forest management, and does not reflect the findings and recommendations of the City's Urban Forest Management Plan.	Comment received. This assessment is typically in the form of a program review.
2-57.	No Revision.	The City would be wise to hire Dudek or similar to do the job that is actually needed: review and revision/update of the Urban Forest Management plan— and it's full integration into the implementing tree policies manual, full analysis of how to restructure our processes and procedures to reflect all relevant General Plan Goals and Policies, including consideration of the precedents of past practices— such as full engagement of the Community Development Department, returning the Sustainability Committee to the jurisdiction and staff of the Community Development Department, creation of an authentic Tree Committee— perhaps including members of the architectural and or planning commission, and/or Sustainability Committee, and including the opportunity for community members to serve directly only on the Tree Committee— with members and staff who have expertise and commitment to trees and to the whole of our urban forest.	Comment received. The Community and Human Services Commission and Tree Committee selection process is directed by Municipal Code 12.06.020
2-58.	No Revision.	And at the very least, redesigning our process to require adequate input, and oversight of policies and procedures to allow solutions for sidewalk interface issues, ADA access, and affordability of our community services in coordination and cooperation and integration with the Community Development Department and interested community members. And somehow create a meaningful and responsive communication with the public and respectful attention to community concerns and input.	Comment received.
2-59.	Page 37 Exhibit 4	The draft Manual policies will not address the issues of the status quo that brought us to this moment.	Comment received. The proposed revision increases transparency by enhancing the documentation and

Comment Number	Revision Location	Comment	Response
			communication process for non-emergency tree removals.
2-60.	No Revision.	My concerns about documenting removals left off the need to report circumstances in which trees involved in infrastructure repair are preserved.	Comment received.

Table 3. Post Public Comment

Table 3 details comments received via email after the public comment period closed but were considered for the final draft of the Manual revision. The table below displays the comments sent to UFMP@dudek.com email address after the Public Comment period was closed, with a total of 12 comments. Most comments from the Post Public Comment period did not call for Manual revisions but will be brought to City Council as community concerns regarding the urban forestry program.

Comment Number	Revision Location	Comment	Response
3-1.	No Revision.	I have read the extensive comments submitted to you by [redacted]. I support them and hope that you will take them seriously.	Manual revision included consideration of the extensive comments received throughout the community input process of this project. This Public Comment Log 3 details those comments and responses.
3-2.	Page 33 – 38 Non-Emergency Removals	Claremont has already lost around 2,000 of its “City” trees. Clearly, the existing process isn’t working and needs substantial reform. Revision of the Manual can help if it contains strong provisions which govern decision-making, reporting and oversight.	The Manual revision includes an enhanced Notification Procedures to all Non-Emergency Removals in advance of trees being scheduled for removal. The posted list of proposed removals will include the reason for each removal and photos. The procedure creates a process where interested parties can opt-in to receive an automatically generated email each time a removal list or an update

Comment Number	Revision Location	Comment	Response
			is posted on the City’s website. The webpage will also include the opportunity for community members to object individual tree removals via the website. These enhancements were included as a response to the request for increased transparency and oversight of the urban forestry program.
3-3.	No Revision.	Your response to comments chart states: "Over the next two years, the City will be focusing on evaluating the City’s Urban Forest Management Plan, Claremont Municipal Code, General Plan, and internal policies/procedures to ensure consistency with the updated Tree Policies and Guidelines Manual." Your statement is the same as it has been repeatedly stated during the City Council Priorities and Objectives process and subsequent budget process.	Comment received. City Council has directed staff to address these priorities in the FY 25/26 and FY 26/27.
3-4.	No Revision.	Throughout that process, I repeatedly pointed out in my public comments that our currently adopted policies state that it be the inverse, and simultaneous, not after the fact: "Claremont’s Tree Policies and Guidelines Manual, the Municipal Code, and the General Plan all provide direction on how the urban forest should be enhanced and maintained. The [Urban Forest Management] Plan discusses trends and issues that affect the urban forest and provides a framework to develop a unified and holistic approach to the urban forestry program. In order to promote consistency, these policies should be reviewed and revised simultaneously." –Claremont Urban Forest Management Plan, page 1	Comment received. Revising all components listed was not part of the scope of work. Council directed staff to address the alignment of all urban forestry related policies, documents, and procedures in FY 25/26 and FY 26/27.
3-5.	No Revision.	The Tree Policies and Guidelines Manual is an implementing document of the Urban Forest Management Plan (UFMP) as is stated in the UFMP, which for its own adoption, needed to comply with the existing General Plan Goals and Policies and Municipal Code. Therefore, the tree policies manual should be revised and evaluated for its consistency with those adopted policies, General Plan Goals and Policies and Municipal Code policies and all City implementation processes and procedures, not the other way around as you state: "Over the next two years, the City will be focusing on evaluating the City’s Urban Forest Management Plan, Claremont Municipal Code, General Plan, and internal	Comment received.

Comment Number	Revision Location	Comment	Response
		policies/procedures to ensure consistency with the updated Tree Policies and Guidelines Manual."	
3-6.	No Revision.	Over the next two years, great—evaluate and update the UFMP, General Plan, Municipal Code, internal policies and procedures. Then evaluate the tree policies manual— an implementing document of the UFMP— for <i>its compliance</i> and consistency with all the above. That's what should have happened in the first place— rather than the current tree policies and guidelines revision— after the withdrawal of the Community Services recommendation for mass tree removals to protect sidewalks, in the name of the windstorm. What can be done to correct this crucial point, and reverse the intention to subsume all else to the tree policies manual?	Comment received. This Manual revision was directed by Council.
3-7.	No Revision.	So at least the future two years are spent on review and refinement of all of our urban forest stewardship in toto, not as defined by the tree manual as the foundational policy to which all else must comply? None of my many previous public comments on this same point have had any effect.	At the time of overall urban forestry program review, alignment of the Manual may be included within a scope of work.
3-8.	No Revision.	Or, is the stated policy hopefully just a poorly written description of the City's actual objective, and what is meant is actually what I have been pointing out, i.e., that all urban forest policies and procedures take precedence over the tree policies manual, which should act to implement consistently those adopted policies and procedures?	The UFMP was developed with the intention to be the overall guiding document for Claremont's future urban forest. The UFMP by design, discusses the overall urban forestry program, goals, etc. in a larger context than the Manual. The Manual mainly guides staff in their day-to-day operations while providing avenues for public communication, oversight, and participation. Reviewing the overall program may assist on identifying aspects of the program that may benefit from modification (such as the example provided in comment).
3-9.	No Revision.	Nowhere does the Dudek/City response to comments state in what manner the UFMP policy is implemented of collaboration and collaborative decision-making with other departments, or whether any departments other than Engineering is consulted.	Pages 25 – 33 in the UFMP identify which departments will collaborate for each action to meet each goal listed in the UFMP.

Comment Number	Revision Location	Comment	Response
		What is the role of the Planning Department, Director of Community Development, Planning and/or Architectural Commission, Sustainability Committee? The response to comment chart only says it exists.	
3-10.	Page 34 Excessive/Reoccurring Property Damage	Comment #55, pg 9 of public comment states in part: "The draft Manual asserts trees can be removed if the value of repair and maintenance exceeds that value of the tree....Who determines the alleged value of the tree, beyond the Community Services Department and West Coast Arborists/ How is value determined regarding the trees' contribution to ecosystem, shade, cooling, beauty, neighborhood character, historic preservation, the added property value to the surrounding private properties, etc? And just because it costs more to maintain than to remove a tree should not in itself be justification for removal. What about the economic and environmental cost to the community from the years of lost value of the removed tree while a replacement sapling tree matures enough to have comparable value to the tree that is removed?" The response to comments chart states: "Comment received. Text amended." But the text is unamended. It is the same in both drafts: Draft revision 6/24 draft pg. 32: Excessive/Reoccurring Property Damage. Community Services shall have the authority to remove a tree causing hardscape/infrastructure/building damage if the cost of repairs is greater than the value of the tree or if the cumulative value of repairs outweighs the value of the tree. Trees causing re-occurring damage shall be reviewed for removal and replacement with new tree species appropriate for the location. Draft 9/24, pg. 32: Community Services shall have the authority to remove a tree causing hardscape/infrastructure/building damage if the cost of repairs is greater than the value of the tree or if the cumulative value of repairs outweighs the value of the tree. Trees causing re-occurring damage shall be reviewed for removal and replacement with new tree species appropriate for the location. How is the value determined? What measures will be taken to avoid tree removal and its cost to streetscape, ecosystem, environment, neighborhood character surrounding property values?	Comment received. Text amended to state that the value of each tree will be an estimated value per tree based on species identified by the tree inventory software.

Comment Number	Revision Location	Comment	Response
3-11.	Page 34 Excessive/Reoccurring Property Damage	Please confirm: the City intends to determine the value of a tree only on the economic impact of its maintenance, and justify removal if it is more expensive to maintain than the presumed value of the tree— and based on whose assessment of value based on what criteria?	The City will evaluate the economic impact of reoccurring infrastructure repairs with the estimated value of each specific tree species identified by the tree inventory software.
3-12.	No Revision.	In future, by directing our emails to all essential parties at the City (not just Community Services Department and City Manager) we can begin to address the assertion of the existing Urban Forest Management Plan, i.e., the need for interdepartmental and city-wide engagement in our analysis and implementation of our urban forest policies and processes. So, first addressees logically are City Manager, Director of Community Development, Director of Community Services, City Council Community and Human Services Commission and its Tree Committee, Sustainability Committee, and already identified interested community members, with cc's to Planning and Architectural Commission, Claremont Heritage, Sustainable Claremont. That way, numerous appropriate parties will at least be aware of our ongoing concerns and efforts. And, at best, being so informed will facilitate contributions of all to an inclusive process more aligned with best practices and our adopted UFMP.	Comment received. Effective urban forest management is a collaborative process and communication among all involved groups is encouraged.

Table 4: Community Meeting – September 2024

Table 4 summarizes input from the Community Meeting held on September 18, 2024, at the City of Claremont Council Chambers. The time each comment was made during the meeting is noted for ease of reference. The video recording for this community meeting can be found on the City’s website at: [Tree Policies and Guidelines Manual - Community Meeting - Sep 18th, 2024](#).

Comment Number	Comment (Summarized)	Time	Revision Location	Response (Summarized)
4-1.	The Manual revision included Tree Protection Zone and ‘right tree, right place’ standards. Are you suggesting that there	10:33	No Revision.	The arboriculture industry has advanced, and the Manual was updated to align with the current arboriculture industry standards. For example, historically, mitigating each removed tree by planting a new tree was a

	was nothing in the Manual that spoke to that objective?			common practice. Utilizing the canopy cover loss from a removed tree and aiming to plant trees that will replace the lost canopy cover is seen as an effective method to maximize the canopy cover of individual planting site.
4-2.	What is the definition of a “declining tree?” In my mind, in an emergency removal a “Declining” tree is in danger of creating a problem and it’s not going to recover, is that your definition as well?	16:18	Page 32 Emergency Removals	A tree health assessment will be performed for each tree that may qualify for removal as a “Dead/Severely Declining” tree. This assessment identifies if a tree is in an advanced state of decline or damaged beyond repair, where a tree will likely not recover. A “Dead/Severely Declining” tree may qualify as an Emergency Removal. The different applications of assessing tree health and tree risk were discussed throughout this project. If a tree is determined to have a level of risk beyond the risk tolerance level of the City, and all feasible risk mitigation methods would not lower the risk to an acceptable level, the tree would fall under “Hazardous Tree” which qualifies as an Emergency Removal.
4-3.	Will ‘hazardous trees’ be assessed by a qualified risk assessment individual? The current edit only notes ISA Certified Arborist.	17:24	Page 33 Hazardous Tree Inspections	Yes, hazardous trees will be evaluated by an ISA Tree Risk Assessment Qualified Arborist. The next FY budget includes funding for staff to get TRAQ qualified. Both Hazardous and Dead/ Severely Declining trees will be assessed by an ISA Certified Tree Risk Assessment Qualified Arborist.
4-4.	When a Tree Risk Assessment is performed, the level of risk should be in the documentation.	20:29	Page 32 Hazardous Tree Inspections	The ISA Tree Risk Assessment form includes the identified level of risk. In the Manual revision, a tree being removed for an unacceptable level of risk will be considered an emergency removal. However, if a tree with an unacceptable level of risk is mitigated to an acceptable level of risk, the tree will not be proposed for removal but documentation of the TRAQ report will be retained.
4-5.	How is “rapidly declining” defined when a tree is recommended for removal? There should be timeframe parameters to monitor the rate of decline.	23:35	Page 33 Declining Trees	Comment received. Text amended to remove ‘rapidly’ as there is no industry standard. ‘Dead/Severely Declining’ are retained under Emergency Removals.
4-6.	The current removal process is: staff brings proposed removal and replacement to the Tree Committee, the Tree Committee votes to support the removal, then it goes to the commission. This is a 2-3-month process for something that is not an emergency. Is	28:10	Pages 33 – 38 Non- Emergency Removals	The current Notification Procedure for Dead, Diseased, or Hazardous removals and replacements is to present the list of removals and replacements to the Tree Committee, post-removal. The proposed revision modifies this process. Instead of the Tree Committee receiving the list of removals and replacements after trees are

my understanding correct that the proposed Notification Procedure in the Manual for Non-Emergency Removals, will now be that: proposed removals are listed on the website, the list will be sent to community members who 'opt in' to the email notification, and then the community only has 15 days to comment. Meaning, the 2-3 month process is not being shortened to 15 days?

removed, the City will post the list of proposed removals, with photos and reason for removal prior to removing trees, on the City website with 15 days for the public to object any proposed removals. If a proposed removal is objected, the City will provide additional documentation for the objected removals. Select proposed removals will still be brought to the Tree Committee in addition to the proposed Notification Procedure, the categories of tree removals was modified from Dead, Diseased, or Hazardous trees to Emergency Removals and Non-Emergency Removals, only.

If a tree is a Non-Emergency Removal, the tree is not identified as potentially hazardous, not dead, and therefore, does not qualify as an Emergency Removal. If the City is notified of a tree concern, the City's ISA Certified, Tree Risk Assessment Qualified, Arborist will prepare an Arborist Report or perform a TRAQ assessment. Whether an Arborist Report of TRAQ assessment is appropriate will be determined on a case-by-case basis, by design.

This means, each situation will first determine if the concern is related to tree risk or tree health. In both situations, all risk mitigation/conflict resolution efforts will be considered, with the goal to preserve as many trees possible, prior to proposing a tree as a Non-Emergency Removal.

When a tree conflicts with infrastructure, the City will consider all feasible conflict resolution methods and evaluate if the tree is healthy enough to recover from construction impacts involved in conflict resolution. If the tree is healthy enough to recover from construction impacts, conflict resolution methods shall be implemented.

If a tree and infrastructure conflict exist and the tree needs to be removed (i.e. gas line), the tree will follow the Non-Emergency Removal Notification Procedure, which allows the community an opportunity to object and request further documentation.

All proposed Non-Emergency Removals will be posted on the City website, an automatic email notification will be sent to all interested parties, and the Non-Emergency Removals Notification procedure will follow.

4-7.	The community is concerned with excessive tree removals and lack of protection for mature trees when conflicts with infrastructure occur. Respectfully, I do not see posting something on the website as being even close to effective in terms of our concerns, which were infrastructure-related removals. Infrastructure removals are highly subjective as it is easier to remove a tree than continue to mitigate a tree and infrastructure conflict. The Tree Committee was established to ensure the community was informed of tree-related issues. I am concerned that this 15-day process and notification are seen as the solutions to community concerns, which the community does not feel is adequately addressed through this Manual revision.	31:24	Pages 33 – 38 Non-Emergency Removals	The Manual revision is an enhancement to the current reporting of removed trees. The City is aware the community’s concerns are not fully addressed through this Manual revision and evaluating policies for tree protection is requested. The Council has directed staff to address actions listed in the Urban Forest Management Plan and this concern will be addressed through this process.
4-8.	The 15-day notification period seems too short to me. If it’s a non-emergency removal, why can’t that be extended to 30 days? What is the justification for 15 days?	34:00	No Revision.	<p>When the City considered the request to increase the public objection period to 30-days, it was identified that a Non-Emergency Tree Removal may be left standing for up to 90- 120 days, which is beyond a sufficient level of customer service as determined by the City.</p> <p>From a service standpoint, residents requesting tree removal see this as a timely issue. When receiving this request, we explain the timeline of the process, which we anticipate being unsatisfactory to some residents who believe this is a timely request. The recommendation for the 15-day public comment period is, truly from a customer service standpoint and meeting operational logistics.</p>
4-9.	The situation described, where a resident is requesting a tree to be removed, has traditionally always gone to the Tree Committee for public comment, at least they should have.	35:48	Pages 33 – 38 Non-Emergency Removals	<p>Historically, for regular sidewalk work, if root pruning or root removal would jeopardize the stability of the tree, those were considered emergency removals and would be removed to repair infrastructure.</p> <p>In the Manual revision, unless circumstances qualify this removal as an Emergency Removal, these trees are categorized as Non-Emergency Removals, and will follow the proposed Non-Emergency Removals Notification Procedure.</p>

				If residents who request infrastructure related work on private property impacting a healthy City tree, and the resident requests the tree to be removed, the request will be heard by the Tree Committee, which retains the current procedure.
4-10.	The Non-Emergency category may leave room that allows the City to bypass these processes. The 15-day public comment period is too short and is restrictive for community members to provide input.	37:26	Pages 33 – 38 Non-Emergency Removals	The City modified their current process to allow for pre-removal public notification and an opportunity for objection by following the revised Notification Procedure for Non-Emergency Removals. Cities approach removal notification in many ways and only cities with staff capacity can provide prior notice to removals.
4-11.	Can you confirm the Notification Procedure includes contacting interested individuals as done in the past?	40:16	Page 37 Exhibit 4	Yes, an automated email will be sent to interested parties through the City website when a removal request is posted.
4-12.	Is there a definition of what consists of a structural conflict? There have been instances where tree removals have been requested due to individuals seeing a tree as a nuisance due to debris... Is infrastructure defined as something that has to do with the road or the sidewalk being dangerous or being difficult to traverse?	51:13	No Revision.	The City defines infrastructure as hardscape. Nuisance debris was retained in the Manual revision as NOT a qualifying reason to remove a healthy tree.
4-13.	The City’s policy works well and the Tree Committee was created to provide the transparency of how these policies are being implemented. I am concerned that community input will be removed from this process to optimize operational efficiency when the purpose of these policies and committees is for the City to be transparent in how they are implementing the policies that align with community values, and is not compromised for efficiency.	55:04	No Revision.	The City sees value in the Tree Committee, however, addressing the Tree Committee is out of the scope of this current project. As we start the public review process of this project, which goes through tree committee, commission, and council, staff will include the public comments received in the final presentation we give to Council. At that time, we will get direction from Council on staff direction. The City must abide by this process to address the Tree Committee concerns as the Tree Committee parameters are housed in the municipal code. Should the City Council direct staff to change the municipal code, there will be a separate analysis and engagement process. The engagement process to change a municipal code would ask the community, ‘what would the Tree Committee look like?’ to ensure the intent is being addressed. This Manual, the UFMP, the General Plan, and the municipal code are all components that help manage the urban forest and Council has directed staff to align all urban forestry materials.
4-14.	The process really ought to be a Tree Committee that’s stands alone and you ask for community members who want to participate, and have a desire and want to	55:04	No Revision.	

	participate in tree policies, and I don't see any action here to do anything like that.			
4-15.	The term "declining, diseased, or dead" the term "diseased" it might be reflected... So if you're saying "declining" what's the difference from diseases?	1:02:45	No Revision.	The word 'disease/d' is only retained to discuss biodiversity and fostering an urban forest that is resilient to known diseases (pg 5), discussion on species diversification (pg 11), Claremont's Designated Street Tree List and biodiversity (pg 12), quality trees and nursery stock (pg 13, 18), watering and pruning practices to avoid disease (pg 23), sanitization of tools (pg 29), 'Pest and Disease Management' and 'Integrated Pest Management' (pg 30), glossary definition for CODIT, and Appendix A Chapter 12.26 of the Claremont Municipal Code. The Municipal Code will be evaluated as per direction of Council. Changes to text in the municipal code is not within the Manual revision project.
4-16.	The concept of Programmed Removals should not be an addition to this revision.	1:06:12	Page 38 Proactive Removal and Replacement Program	<p>The Programmed Removals concept is retained from the Manual and not an addition from this revision. The City currently implements the Programmed Removals concept when appropriate. This includes, the liquidambar removal and replacement program and ash tree removal and replacement program. These programs were approved and are already in place. The species in the approved 'Programmed Removals' are assessed every year. We use these programs to manage species with predicted challenges such as ash aging out of the City needing replacement with younger trees. Each removal is replaced and replanted with suitable street trees. When we remove mature pine trees to make infrastructure improvements, the City replants each viable site with more appropriate street trees for that area.</p> <p>When 'Programmed Removals' are proposed, the current process requires a recommendation from Tree Committee and approval from the Commission to implement this plan. The liquidambar project was approved by City Council.</p> <p>As part of the Manual revision, we will include that Programmed Removals must be recommended by the Tree Committee and approved by the Commission, and approved by City Council.</p>
4-17.	If someone has ADA concerns, they should repair the street and the sidewalk effectively to resolve the ADA issues. This is why the community is requesting further transparency measures. We want to ensure	1:09:48	Pages 35 Exhibit 2 and Page 36 Exhibit 3	The current language in the Manual for 'Programmed Removals' is 'Tree Removal and Replacement Program.' This concept was not added to the Manual but has been retained in the Manual throughout revisions. The verbiage describing this concept was expanded to provide further context and clarification. The Revision Location points to an illustrated 'Tree and

	decisions were made as the policies were intended to be implemented. We want to ensure decisions for tree removal were not made for convenience, healthy trees are not removed if an infrastructure conflict can be mitigated and a tree retained.			Infrastructure Conflict Resolution Feasibility Chart.’ These decision-making charts <u>first</u> considers the health condition of the tree. Conflicts where trees are in ‘Fair’ or ‘Good’ health condition will first consider all potential conflict resolution methods prior to considering removal.
4-18.	I’m not saying there isn’t a reason to have a program for tree removal for a tree species, I’m not suggesting we never have it, but it should be a separate issue rather than part of the tree policies and procedure Manual, as they are completely different tasks.	1:13:53	Page 38 Proactive Removal and Replacement Program	<p>The verbiage in the Manual only allows staff to take a “Programmed Removal” project proposal through the public process. Staff does not have the ability to implement a ‘programmed removal’ project without review from the Tree Committee, the commission, and ultimately approval from the City Council.</p> <p>There is existing documentation of ‘Programmed Removal’ project proposal which shows that the public process was followed, which included community workshops, public comment period, tree committee, commission, and Council. The transparency parameters are outlined in this process and the Manual ONLY gives staff the ability to propose a program to go through the community process.</p> <p>The Programmed Removals revision does not include additional changes beyond renaming the section to ‘Proactive Removal and Replacement Program,’ and framing the concept with a more thorough narrative. Additional changes may be requested on a case-by-case basis. Case-by-case changes will NOT modify the public process parameters required to implement a Programmed Removal project.</p> <p>The Manual will be revised to provide further context on the public process associated with Programmed Removals.</p>
4-19.	What information is going to the Tree Committee on the 16 th and what of this input is going to be included in that?	1:25:15	No Revision.	After this meeting, the City will meet with Dudek, the Community Development Department, and the City Manager’s office. All comments received at this meeting and throughout the project will be taken into consideration for the Manual revision. If there are major changes, another public draft may be released. When presenting a recommendation to adopt the Manual revision, staff will include any additional information that was been presented throughout the process. This will include, for example, Tree Committee selection parameters. The dates for the meetings are tentative and may be postponed, as they have been throughout this project, as a response to community input.

4-20.	Page numbers didn't align in the Public Draft.	1:27:43	'Revision Location' column for Public Comment Log	Page numbers noted in public comments will be adjusted to align with where the revision took place in the next draft of the Manual.
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