

## CITY OF CLAREMONT TREE POLICIES AND GUIDELINES MANUAL REVISION

### Public Comment Log [September 2024]

The Tree Policies and Guidelines Manual Revision for the City of Claremont (City) was open for Public Comment from June 3, 2024, to July 8, 2024. The table below displays the comments sent to UFMP@dudek.com during the Public Comment period, with a total of 60 comments. With the intention to provide clarity and as a response to the community engagement process requesting transparency, all comments addressed in the Manual are detailed in the following table. Community concerns originally discussed with the project team was included in Table 2: Community Recommendations.

## 1. Public Comments

Commentor	Comment	Response
1	Page 3, paragraph 4 - add: "and there is no reasonable alternative to resolving the conflict."	Comment received and text amended.
2	<p>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 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>Comment received and addressed. Economic value no longer mentioned in this passage since natural resources transcend western society means of quantifying value.</p>
3	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.
4	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
5	Page 8 – paragraph 1 - It is not clear what is meant by "community – facing educational materials"?	Comment received. Language clarified.

Commentor	Comment	Response
6	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.
7	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.
8	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.
9	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.
10	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.’
11	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.
12	Page 28 – paragraph following Root Shaving - should read “the bottom of the new hardscape.”	Comment received. Text amended.
13	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	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.

Commentor	Comment	Response
	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.	
14	Page 29 – second paragraph following Removal - consider and document all feasible mitigation options...	Comment received. “And document” added.
15	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.
16	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.
17	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.
18	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 for clarification. A timely removal is a removal that is needed to alleviate emergency conditions. This includes emergencies that are not caused by the tree.
19	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.
20	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.
21	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.
22	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.
23	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.

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24	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’ is being explored.
25	Page 31 Paragraph following Standard Removals – change “standard removals” to “Non-Emergency Removals.”	Comment received. Text amended.
26	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.
27	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.
28	Pages 33 and 34 are unreadable in the downloaded document.	Comment received.
29	Page 35 Paragraph following Standard Removals - As mentioned earlier, “Standard” should be replaced with “non-emergency.”	Comment received. Text amended.
30	Page 35 following item 4a and 4b in exhibit 4 – It is not clear who incurs the additional costs.	Comment received. Costs clarified.
31	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.
32	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.
33	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	Comment received. Definition modified to include necessity for expertise.

Commentor	Comment	Response
	diagnosis of a pathogen, the conclusion that the tree is “diseased” is inappropriate and can be misused. I suggest removing this from the glossary.	
34	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.
35	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.
36	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.
37	There are far too many categories of tree removals described in the Manual. I noted the following: <ul style="list-style-type: none"> <li>• Programmed removals</li> <li>• Standard removals</li> <li>• Emergency removals</li> <li>• Timely removals</li> </ul> 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.
38	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.
39	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.
40	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.	Comment received. A public meeting will be scheduled after the public comment period. The original schedule was modified in response to community input.

Commentor	Comment	Response
	<p>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 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>	
41	<p>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.</p>	<p>Comment received. The Manual revisions include an enhancement of communication processes for non-emergency tree removals. The Manual revision includes 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 remaining low risk of tree part failure.</p>
42	<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.</p> <p>The Public Comment period included the following notification methods:</p> <ul style="list-style-type: none"> <li>- One email to the interested parties email group</li> <li>- Announced at a City Council meeting by the City Manager</li> <li>- Included in the City Manager's Weekly report</li> </ul> <p>This Manual is considered an internal policy and guidelines document and does not follow the same communication protocol as</p>

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		other City efforts that are announced using social media such as a housing element or General Plan process.
43	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 Tree Committee and the Community and Human Services Commission after the public review process.
44	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: <a href="https://drive.google.com/file/d/1ZfauCfI52q_05hfsEAnkMX0Is09xKJAo/view">https://drive.google.com/file/d/1ZfauCfI52q_05hfsEAnkMX0Is09xKJAo/view</a>	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.
45	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: <a href="https://drive.google.com/file/d/1LVJc1qTckC8QZAQ_IRyHk8NgT2r7udl4/view">https://drive.google.com/file/d/1LVJc1qTckC8QZAQ_IRyHk8NgT2r7udl4/view</a>	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. 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.
46	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 and Community Development Department work plan for the next two fiscal years includes review of UFMP recommendations to identify items addressed since UFMP development
47	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	Comment received. Items identified for collaboration between various departments are identified in the UFMP. Community

Commentor	Comment	Response
	implementation of numerous General Plan Goals and Policies listed in the manual, or Sustainability Committee, or any agency outside of the Community Services Department.	Services staff regularly works with Community Development staff on related concerns.
48	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.	<p>Comment received. The make-up of the Tree Committee is dictated by the Claremont Municipal Code and selected from members of the Community and Human Services Commission.</p> <p>The Tree Committee selection process is directed by Municipal Code 12.06.020</p>
49	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.
50	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.
51	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.
52	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



Commentor	Comment	Response
		uncommon among the industry and would require higher education.
53	<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. 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>
54	<p>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.</p>	<p>Comment received. Community Services staff works with Community Development staff to address ADA requirements.</p>
55	<p>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 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>	<p>Comment received. Text amended.</p>

Commentor	Comment	Response
56	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. 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.
57	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.	<p>Comment received. The Community and Human Services Commission and Tree Committee selection process is directed by Municipal Code 12.06.020</p> <p>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.</p>
58	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.
59	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 communication process for non-emergency tree removals.
60	My concerns about documenting removals left off the need to report circumstances in which trees involved in infrastructure repair are preserved.	Comment received.

## 2. Community Recommendations

The following table outlines the “2023 Tree Policy Guidelines Manual Review – Community Recommendations’ PowerPoint that was presented to City staff during the Manual revision process. The PowerPoint was shared with the consultant team to inform them of overall urban forestry community concerns. The consultant team prepared the following table as per request from staff with the intention to provide clarity and transparency to the urban forestry program. Enhancing transparency was identified as a community priority during the engagement process for this project. All comments addressed in the Manual are detailed in the following table. Items beyond the scope of this project and would require addressing through various avenues, were consolidated in Table 3.

#	Comment	Response
2-1	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.
2-2	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.
2-3	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. Manual revision includes guideline to follow the Western Chapter ISA Tree Care for Birds and Wildlife Best Management Practices.
2-4	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.
2-5	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.
2-6	Tree Committee meetings should be scheduled monthly/bimonthly at minimum and not regularly canceled.	Comment received.
2-7	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.
2-8	Tree valuations should be accurately tabulated and represented using current best practices for tree valuation (not just replacement value).	Comment received.
2-9	Community and Human Services Commission should request of City Council and Manager adequate funding for both staffing expertise and levels.	Comment received.

#	Comment	Response
2-10	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.
2-11	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. Community Services staff regularly communicates with Community Development staff on urban forest planning.
2-12	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 in the Manual 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 Property Tree Protection Ordinance is beyond the scope of this project. See Table 3 for detailed response to this comment.
2-13	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 2-13. Both ‘Topping’ and ‘Lion Tailing’ are listed as prohibited pruning practices within the Manual.
2-14	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.
2-15	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.