Josh Petter

Comment on page 8:
Recommend providing an exemption for removal of noxious trees under 6 inches diameter at 4.5 feet. This should include black locust, cherry laurel, holly, etc.

Comments related to page 124:
Recommend defining qualified arborist as "ISA Certified arborist with Tree Risk Assessment Qualification"

Recommend inclusion of something like " Vegetation within shoreline areas may be altered only upon prior written approval by the Director. A report by a qualified professional shall be required to address alternatives, to ensure that the proposed alteration will not be detrimental to surrounding properties and to the functions and values of the associated critical area. Hazard tree removal proposals shall include documentation from a qualified tree professional using the International Society of Arboriculture Tree Risk Assessment Qualification (TRAQ) method in its most current form. Replanting shall result in no net loss of functions and values and result is similar area of vegetation coverage within three year"

Recommend adding something regarding tree topping such as "6. Any tree that is topped, unless recommended by a licensed and qualified tree professional for the tree's structural stability and longevity, is considered to be removed and requires a tree permit. The assessment shall be conducted prior to topping. Removal without a permit is subject to tree replacement and code enforcement provisions for illegal removal."

3-to-1 replacement of trees is challenging when there is not sufficient space. What would we do if one large tree in a small space is removed and there is not sufficient space to plant? Please include some alternative, such as a combination of trees, shrubs, and groundcovers to result in comparable or better native vegetation coverage within three years, or an alternative that results in no net loss of functions and values as determined by a qualified professional. Starting with a baseline of 3-to-1 is ok, but there will be many sites we can't realistically accommodate that. The retention of snags and removal of noxious weeds should also be considered for mitigation.