

City of
SACRAMENTO

Sacramento Urban Forest Plan



Rachel Patten

From: Looney, Ayana@ [REDACTED]
Sent: Tuesday, April 30, 2024 12:24 PM
To: Urban Forest Plan
Subject: Comments to draft Sacramento Urban Forest Plan (SUFPP)

Hello,

I'm sure you'll see many comments, so I'll keep this quick.

The tree company canopy must be at least 80% native and drought-tolerant trees. The other 20% could be a mix of non-native trees, but only as arborists recommend.

Ensuring that most trees in the canopy are native and drought-tolerant promotes environmental sustainability and resilience in the face of climate change. Introducing a small percentage of non-native trees under the guidance of arborists allows for diversity in the canopy while minimizing potential ecological risks. (More information can be obtained from the Arbor Day Foundation and USDA Forest Service.) We need to prioritize restoring the ecology and supporting native wildlife. We also need to plant trees ASAP in neighborhoods that lack a canopy.

It's a stark reality that communities of color, on average, have 33% less tree canopy than majority white communities ([Scientific American 2021](#)). The health benefits of a tree canopy, such as a reduction in asthma rates ([USDA Forest Service 2016](#)), should be accessible to all, regardless of race/ethnicity and income.

Thank you for reading.

Sincerely,

Ayana (*eye-on-ah*) Looney (she/her), Library Assistant
California State Library Technical Services

[REDACTED]
[REDACTED]

"Where to shelve a book? It's not a little thing. You're telling the world what to value. Who to value. You get our responsibility?" ~Underworld Penny, The Magicians season 4, episode 7.

Rachel Patten

From: Janis Guissi [REDACTED]
Sent: Tuesday, April 30, 2024 5:21 PM
To: Urban Forest Plan
Subject: Tree Canopy

It is no surprise that Sacramento neighborhoods with the highest rates of tree canopy are two of the wealthiest. Keeping large trees healthy and growing takes a lot of money and few people in the lower end of the income spectrum—those that live in areas where the trees are needed the most—simply cannot afford the upkeep.

A united effort by environmental groups in the community, perhaps headed by the Sacramento Tree Foundation, should promote a campaign for a designated fund dedicated to maintaining trees within the City on private property. Trees are an important community asset whether they are located in public parks or private yards, and we need to protect those that are already here as well as encouraging the planting of more.

Janis Guissi

Sent from my iPhone

Rachel Patten

From: Jessica Mohammed [REDACTED]
Sent: Tuesday, April 30, 2024 12:29 PM
To: Urban Forest Plan
Subject: Tree Planning In Del Paso Heights

Hello,

I read in a CapRadio newsletter that there are hopes/plans to expand tree coverage across Sacramento. I'd love to see Del Paso Heights be a part of that initiative. I live and work in the area so I know first hand how intolerable the heat of the summers can be and some extra shade would go a long way in helping to keep homes cool and energy bills down as well. As a teacher at Northwood Elementary, I've heard from many parents that they often can't afford to run their AC much over the summer and bring their children into school each day of our summer program simply because it is too hot and unsafe to keep them home.

I'd love to find a way to connect your organization with the Twin Rivers Unified School District to find a way to reach out to families on planting trees and creating shade for our vulnerable community.

Thank you,
Jessica Mohammed

Rachel Patten

From: Laurel Hollis [REDACTED]
Sent: Tuesday, April 30, 2024 1:34 PM
To: Urban Forest Plan
Subject: Tree planting suggestion

Hello,

I live in the Land Park neighborhood near Broadway. During the storms a few years ago, quite a number of trees fell during the storms. I'm noticing that many of the trees aren't being replaced by homeowners. I'm guessing that's because they don't want to experience the costly destruction once more. I believe that planting an appropriate tree would increase shade cover and improve the appearance of their homes. They need advice!

Could the City arborists or the Sacramento Tree Foundation offer advice one-on-one in response to an offer to each homeowner? I don't think they'd need financial help, just advice and encouragement.

Thanks for listening.
Sent from my iPhone

Rachel Patten

From: Michael Silver [REDACTED]
Sent: Wednesday, May 1, 2024 4:56 PM
To: Urban Forest Plan
Subject: Comment on Urban Forest Plan

One of the most troubling aspects of recent building trends in Sacramento is the non-stop approval of new construction right up to the edge of the sidewalk; that is, without any setbacks for trees. This is most noticeable in the urban core of downtown and midtown, although it is happening in other neighborhoods as well. The result is not only furthering of "heat islands", but the reduction of urban forest.

A major contribution to development and replacement of the urban forest would be for the planning department to stop approving new construction that eliminates space for trees between the street and the building, whether that means street-side of conventional sidewalks or setbacks.

From: [REDACTED]
To: [Urban Forest Plan](#)
Subject: City of Trees -- Urban Forest Plan
Date: Monday, May 6, 2024 7:43:48 PM

Hello Urban Forest Plan team,

I just want to say wonderful job with the Sacramento Online Community Draft Plan Workshop powered by Konveio, It's awesome to be heard and post comments and see other people's ideas and feedback.

I also wanted to mention something that is so near and dear to many Sacramentan hearts and that is the tagline, "City of Trees." I bet you perked up with excitement and enthusiasm just seeing it in the subject line. I know I did while writing it. A city is many things and can be more than just one tagline. For example, Sacramento is The Farm to Fork Capital and it's The City of Trees. It's also the River City.

I would like to see "The City of Trees" put back on the water tower of which it was deleted without public approval. It was deleted without asking the community and has undermined and divided our city ever since. Instead of deleting it, space should have been created also to say "Farm to Fork." Hundreds of thousands of residents want to see it back on the water tower and for people passing through it was also a beautiful sight to see...

Please consider setting aside time, effort and dollars to put the City of Trees back on the water tower for a public engagement and civic pride opportunity.

Best regards,
Tyler Wunsch
Proud resident of The City of Trees

Rachel Patten

From: Anita Bhatia [REDACTED]
Sent: Tuesday, May 7, 2024 5:11 PM
To: Rachel Patten
Subject: Follow up and some feedback on Urban planning report

Hello Rachel,

Great to have met you! Also, visited the city site to read through the draft Urban forest plan.

I like your emphasis that trees need to be considered part of the infrastructure. That to us is the fundamental issue. We have been advocating for trees-every-sidewalk, not more than 30ft apart(with some exceptions for structures already in place). It should be a relatively easy policy change for any sidewalk going forward.

Catching up with existing sidewalks is a mammoth(but doable!) task, which needs to be taken seriously. We will be fixing the damage done over past 50 years or so. From our research, we found that somewhere in 1980s, the municipal budgets got slashed and trees were easy ones to axe, as long as sidewalks got built. Prior to that, trees were integral to urban planning, as evident with mature tree canopy in older neighborhoods.

Recommended 25000 trees per year sounds about right. We may need to prioritize city sidewalks first, these are creating heat islands all over the city. Converting existing hardscape would require cutouts in existing sidewalks so needs to be accounted in budgets. San Francisco very admirably has been doing that in partnership with fuf.

Anyways, we do feel the size of the task ahead does require all-hands-on-deck approach. So looking for ways to collaborate and get creative about accelerating the pace of Urban forest canopy creation.

Earth report is our motivation-

<https://berkeleyearth.org/global-temperature-report-for-2023/>

Would it be possible to meet up in person sometime early next week. Or flexible based on your availability. I'll also plan to bring along a consolidated feedback on the draft report.

Thank you,

Anita
[REDACTED]

Rachel Patten

From: Billie Hamilton [REDACTED]
Sent: Monday, May 13, 2024 11:11 AM
To: Urban Forest Plan
Subject: Mini forests

Dear Friends,

I want to suggest adding the idea of planting mini forests to your Urban Forest plan. The Miyawaki Method **was devised by a Japanese botanist** Akira Miyawaki. “Hanna Lewis ”explains how tiny forests as small as six parking spaces grow quickly and are much more biodiverse than those planted by conventional methods. She explores the science behind why Miyawaki-style mini-forests work and the myriad environmental benefits, including: cooling urban heat islands, establishing wildlife corridors, building soil health, sequestering carbon, creating pollinator habitats, and more.” Thank you for the work you do.

Billie Hamilton
Clerk Eco-Spirituality Committee
Sacramento Friends Meeting

Rachel Patten

From: Kate Riley [REDACTED]
Sent: Wednesday, May 22, 2024 7:46 AM
To: Rachel Patten
Cc: Kate Riley
Subject: ideas on trees as infrastructure

Here are some interesting articles from “Dark Matter Labs” in the UK.
The most recent one is about using AI in Stuttgart to evaluate tree canopy.

Trees as infrastructure 1

<https://provocations.darkmatterlabs.org/trees-as-infrastructure-1dd94e1cfedf>

Trees as infrastructure 2

<https://provocations.darkmatterlabs.org/trees-as-infrastructure-aa141acdf227>

Stuttgart AI project location-based scoring

<https://provocations.darkmatterlabs.org/treesai-is-implementing-location-based-scoring-in-stuttgart-c54c752bdaaf>

Rachel Patten

From: Lucinda Willcox
Sent: Thursday, May 23, 2024 9:18 PM
To: Rachel Patten
Subject: Fwd: Planning and Design Commission
Attachments: PlanningCommission Letter for May 2024 Mtg..docx; Building Setback Guidelines.pdf

Hi Rachel,
Please include this in the UFP comments.

Lucinda

Begin forwarded message:

From: Daniel Pskowski [REDACTED]
Date: May 23, 2024 at 8:59:07 PM PDT
To: Lucinda Willcox <LWillcox@cityofsacramento.org>
Subject: Planning and Design Commission

Hi Lucinda,

It was nice seeing you. Attached is the letter plus attachment that I passed out to the commissioners. On the Speaker Slip I left it blank on the Organization/Business Representing: line. I volunteer with Trees for Sacramento. However, I just put this letter together this afternoon and did not run it by the Trees for Sacramento folks.

Also attached is an article that appeared in the Viewpoint which is the Sierra Curtis Neighborhood Association (SCNA) monthly publication. I have been writing monthly tree articles for about eleven years.

Take care - Dan

Daniel Pskowski
[REDACTED]

<Viewpoint Article on Climate Action GPPlan.pdf>

May 23, 2024

5/23/24 Planning and Design Commission Meeting, Agenda #6 Draft Sacramento Urban Forest Plan Public Release File ID: 2024-01070

Dear Commission Chair Wallace and Fellow Commissioners,

The draft Urban Forest Plan does not contain Developer Guidelines for City Street Trees which were part of the first Urban Forest Management Plan. Attached are those guidelines which are crucial for the development of canopy coverage downtown. When the tree ordinance was revised in 2016 it weakened the protection of trees. The section of the code 12.56.060 "Protection of trees" was eliminated. The code also needs to be revised because Urban Forestry routinely approves the removal of all trees on site including private protected trees claiming that the current ordinance requires it.

I am a degreed arborist who has lived and worked in Sacramento's urban forest for the past 33-years. I was employed by the City of Sacramento as an arborist/urban forester from 1990 until retiring in April 2020. My first fifteen years I was the sole city arborist and worked on most of the development projects. This included the downtown State of California office towers i.e. Secretary of State, Attorney General, Cal EPA, Dept. of Education to name just a few. I also worked on Sutter Memorial hospital, the Shriners hospital, in addition to the St. Francis downtown housing project and residential subdivisions like River Grove in the Pocket area.

Tree Preservation was one of the public's top priorities when the City of Sacramento's first Urban Forestry Management Plan was developed from 1990-1992. The public wanted more than just native oaks on private property protected. Therefore, the tree protection ordinance was revised to protect all trees whose trunks measure 100 inches in circumference or greater at standard height. The size of native oaks was reduced from 100 to 36-inches in circumference at standard height. The development community understood that heritage trees were protected and could not be removed and mitigated for site development. The ordinance has since been revised and trunk diameter is used instead of circumference. Therefore, any tree 32-inches in diameter or greater, native oaks 12-inches in diameter or greater and trees 24-inches in diameter or greater on undeveloped lots or lots with multiple dwellings are protected.

Trees are our first line of defense in combatting climate change. Yet more Sacramento trees have been removed in the past decade than in the twenty years prior. Why? There was a paradigm shift in Sacramento's urban forest. It went from the protection and preservation of trees to removing them on development sites. This change was in response to then City Manager Ray Kerridge direction to city staff that development sites should be "shovel ready". This meant that the site was cleared and ready to build. The second mandate to city staff was "getting the customer to success". Based on these two edicts Urban Forestry developed a successful tree removal program. Healthy, structurally sound private protected trees were now being removed on development sites and on residential properties. So many large trees in Sacramento were being removed that the Sacramento Tree Foundation initiated

an Urban Wood Rescue Program. Downtown developers were able to remove all the city street trees. Numerous downtown sites which were developed in the past ten years have no mature trees around them.

On development sites Urban Forestry indicates that the city code requires them to approve the removal of private protected trees. *"SCC section 12.56.050, the City shall issue Tree Permits for removal of private-protected trees if: 1) the applicant provides an adequate tree replacement plan, and 2) the City finds that the trees must be removed to use the property for any permitted use as of right or by discretionary permit under the Planning and Development Code (SCC Title 17) for the zoning district in which the property is located, and the use could not be made of the property unless the tree is removed."* Now this is the exact same ordinance language that I worked under, and private protected trees had to be preserved. The development community clearly understood this and for 15 years on all development projects trees were preserved. Furthermore, there were no legal challenges regarding how this section was being applied. At that time I would meet with developers on sites before they purchased the property, so they understood which trees had to be preserved. This section of the ordinance refers to sites where no development could occur unless the tree was removed. Not that the tree must be removed to maximize the building square footage or the number of units for the site. This ordinance would be applied if there were a single-family residential lot with a tree in the middle of it. Furthermore, Urban Forestry also approves the removal of private protected trees on adjacent properties.

This significant loss of canopy in Sacramento has impacted how much carbon dioxide sequestration occurs. More importantly, is the permanent loss of space to grow large canopy shade trees. Since developers are not required to provide above and below ground building setbacks the trees being planted downtown are columnar trees commonly referred to as popsicle trees. The placement of underground utilities in the planting areas also precludes the planting of large canopy shade trees. Any gains in the reduction of greenhouse gases in areas like transportation are wiped out due to the reduction in canopy. I would like to lead this commission on a tour of downtown sites to show firsthand what is happening to Sacramento's urban forest. Please contact me at **danielpskowski@gmail.com**

Sincerely,

A handwritten signature in cursive script that reads "Daniel Pskowski".

Daniel Pskowski
B.Sc. Landscape Horticulture (Colorado State University)
ISA Certified Arborist WE-0964 A
ISA Tree Risk Assessment Qualified (June 2018 – June 2023)

CITY OF SACRAMENTO

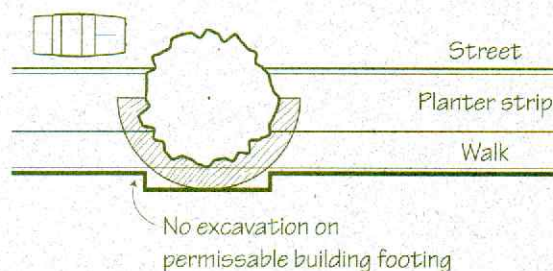
Developer Guidelines for City Street Trees

The City of Sacramento, Tree Services, recommends that developers adhere to the following guidelines in order to preserve and continue Sacramento's proud heritage of large shade trees throughout the downtown area.

SOIL AREA

Mature city street trees and newly planted street trees need adequate soil area for the preservation and development of a strong root system. City Tree Services recommends that no significant excavation occur within 10 feet of the face of the sidewalk adjacent to any existing street tree or adjacent to any designated planting location. "Significant" excavation is defined as more than 12 inches.

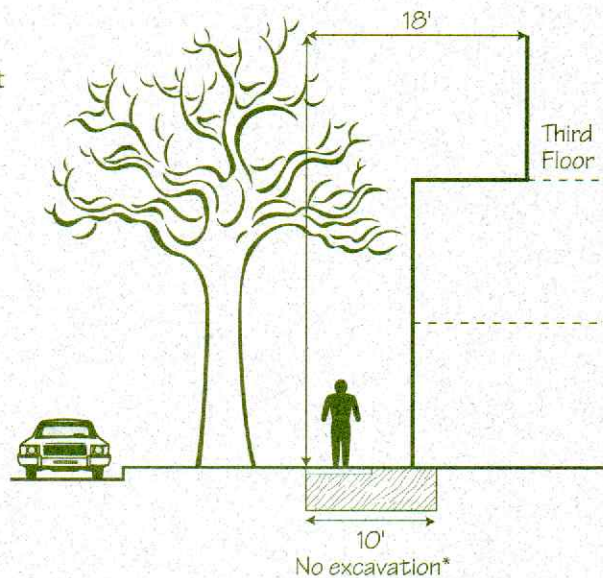
- Soil area is necessary for tree support to prevent blowing over.
- Soil area is necessary for roots to acquire necessary water and nutrients.



AIR SPACE

Street trees also require air space to enable the tree to develop a significant crown. Tree Services recommends that construction above the second story level be set back a minimum of 18 feet behind the face of the sidewalk adjacent to any existing street tree or adjacent to any designated street tree planting location.

- Air space is necessary for trees to have strength and balance. A tree with a 6-foot width on building side and a 25-foot width on the street side is both awkward in appearance and in danger of blowing over.
- Air space is necessary if a tree is to receive sunlight and air to synthesize its food requirements and to provide the public with cooling shade, air purification, and beauty.



*This is the minimum requirement. More area may be required for mature trees.



CITY OF SACRAMENTO

Department of Parks and Recreation, Tree Services Division
5730 24th Street, Building 12A
Sacramento, CA 95822
(916) 433-6345
<http://www.cityofsacramento.org/parks/trees/>



Rachel Patten

From: janishulla [REDACTED]
Sent: Thursday, May 23, 2024 11:15 AM
To: Urban Forest Plan
Subject: Sacramento citizen's comment on the Urban Forest Draft Plan

May 23, 2024

This is a request that, prior to implanting the proposed plan, the City Council delete the "drip line" clause that is currently in the City Landscaping and Paving Regulation.

Rational:

1. This clause is inconsistent with the objectives stated in the propose plan.
2. Banning the installation of artificial turf under trees' drip lines is also inconsistent with local governments' directive to reduce: a) water consumption, b) use of gas-powered lawn care tools, and, c) use of fertilizers that may leak into the drainage system. At your request, I will provide you with evidence of current artificial turf at homes in Land Park where the turf has not negatively affected the trees' health over the many years it has been installed under the drip lines. You can personally view an example in the front yard at 1209 Swanston Drive.
3. The City of Sacramento is violating the constitutional right to fair treatment under the law of residents, like me, who are issued a statement of violation of the City Code (below) since violations are only issued when a complaint is filed.
City Code Chapter 17.612 Landscaping and Paving Regulation,
17.62.010 Landscaping requirements,
A. Landscaping requirements in setback areas:
 1. Single-unit & duplex dwellings-Front-yard and street side-yard setbacks
 - b. Landscape and maintenance requirements "... artificial turf may be used if it ... **is not located within the drip line of any trees.**"

Respectfully,
Janis Hulla, PhD
Land Park resident

Rachel Patten

From: Nicolina Hernandez [REDACTED]
Sent: Thursday, May 23, 2024 6:37 PM
To: Rachel Patten
Subject: Tree Planting

Rachel,

Wonderful presentation today. Please consider SDG&E's success and programs that helped them achieve 45,000 trees planted between 2021-2024:

[SDG&E Celebrates Arbor Day with New Milestone - 45,000 Trees Planted Since 2021 | SDGE | San Diego Gas & Electric - News Center \(sdgenews.com\)](#)

Thanks!

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Sincerely,
Nicolina Hernandez
Planning & Design Commission
City of Sacramento - District 6
[REDACTED]

Rachel Patten

From: Kate Riley [REDACTED]
Sent: Wednesday, May 29, 2024 1:47 PM
To: Rachel Patten
Subject: Partner Advisory Committee on 35% canopy goal

Francesca's statement identifies the page number. There may be another place, too?
p. 33, 2nd paragraph

"The CAAP identifies 35% canopy by 2045 ..., a goal that was supported by the Partner Advisory Committee...."

I was on both the 2018 and 2023 PAC and attended all the meetings. I do not remember the 35% goal being supported by the PAC, and the 18-page report from the PAC meetings does not support this statement (Urban Forest Plan Stakeholder Meeting #1, 5/9/2018, pp. 120-138 of the Urban Forest Plan, specifically pp. 129-130, 133.) The draft UFP we were shown in 2023 already contained this statement.

From: Simmerer, Mary@DGS [REDACTED]
Sent: Tuesday, June 4, 2024 4:10 PM
To: Urban Forestry <urbanforestry@cityofsacramento.org>
Subject: Sacramento Urban Forest Plan - Possible Partnership

Hello,

My name is Mary Simmerer. I am currently employed by the Sustainability Office at the Department of General Services (DGS). Recently, the DGS Sustainability Office was engaged in efforts with the California Natural Resources Agency (CNRA) regarding the 2023 Carbon Scoping Plan and the role natural and working lands can play in mitigating climate change. As part of the scoping plan, CNRA is developing a carbon plan of which DGS and urban forestry can play a role.

I understand that Sacramento is in the process of developing an Urban Forest Plan that is currently undergoing the public comment process. The timing of the Urban Forest Plan will work very well with regards to a potential state partnership.

AS you may know, DGS and other Sacramento-based state agencies own a significant number of properties in Sacramento where trees might be planted. DGS would like the opportunity to discuss a possible partnership with the City of Sacramento for enabling planting trees on state property. These new tree plantings can then be included in Sacramento's Urban Forest Plan and goals. Such a partnership would aid DGS and other Sacramento based state agencies as well as Sacramento in furthering climate change goals.

If someone could contact me, I would be happy to discuss the partnership potential further.

Sincerely,

Mary Simmerer

Mary Simmerer
Water Efficiency Expert
Office of Sustainability
Department of General Services
[REDACTED]



Rachel Patten

From: Lucy, Burke@ [REDACTED]
Sent: Tuesday, June 11, 2024 5:00 PM
To: Urban Forest Plan
Subject: RE: Can you present to our group on City's draft Sacramento Urban Forest Plan?

Hi Rachel,

Thank you again for speaking to our Sustainability Interest Group today. I counted at least 30 people attending, which is a good crowd for our group. So, there's certainly interest in the topic and I appreciate you expertly fielding all the questions for us.

It came up in the discussion that 'tire-derived tree surrounds' can allow tree roots more freedom and still allow people to walk on the sidewalk more freely than broken or cracking concrete. Looks like using this product even gets you LEED points – for a LEED-certified sidewalk? Now I remember where I saw it – in Key West, FL below. [This website](#) has more details (a link from my agency's [webpage](#) links to a [catalog](#), which has the same products as that website).



Thanks again!

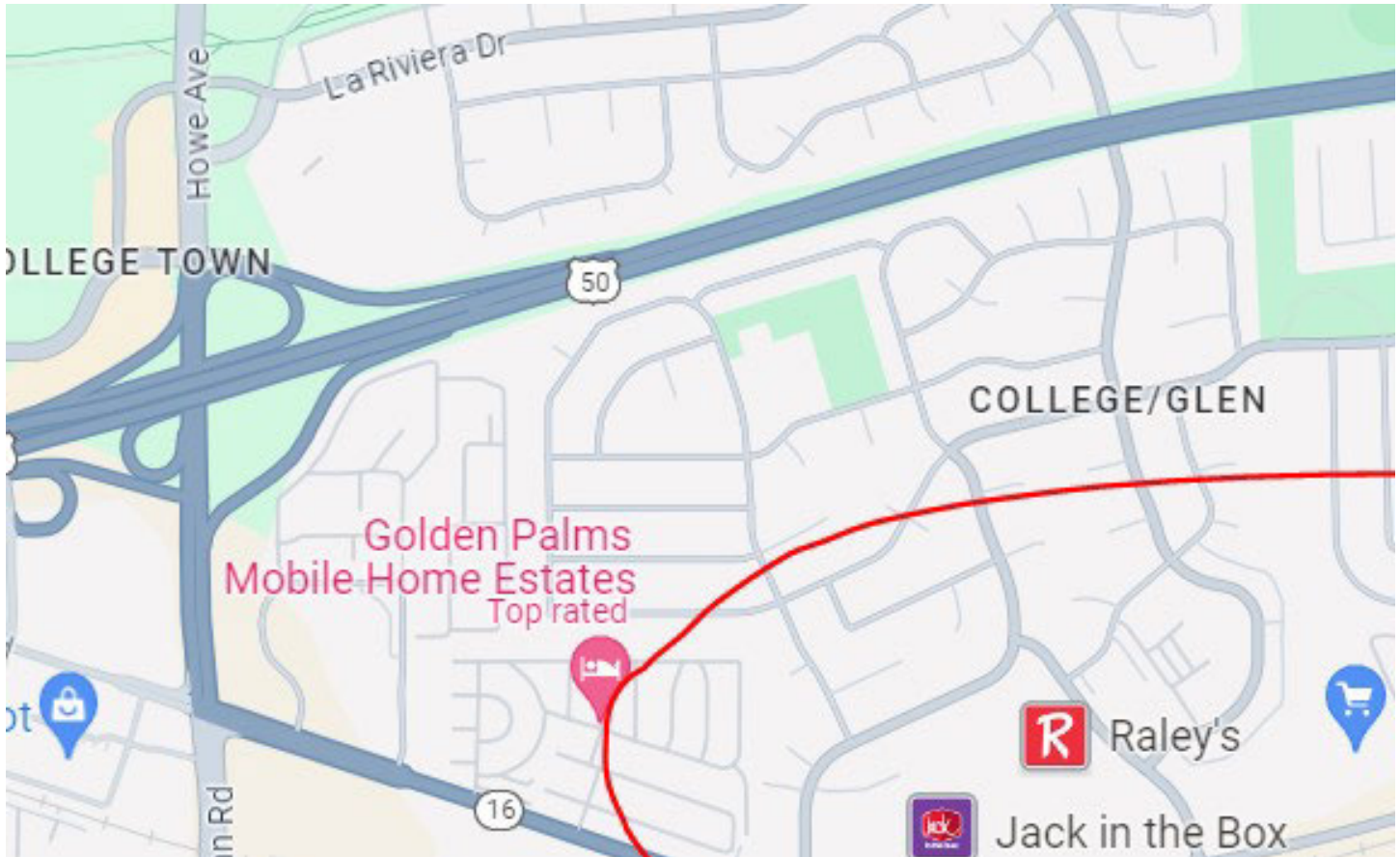
Burke

Rachel Patten

From: Gillian Lasher
Sent: Wednesday, June 12, 2024 6:17 PM
To: Rachel Patten
Subject: UFP comment

Hi Rachel,

I don't have time to read the document but know this area needs trees. Let me know if there's a more formal way to submit this comment.



You're getting so close to the finish line. You've got this. 😊

Gillian Lasher ([she/her](#))
CivicSpark AmeriCorps Fellow | Office of Climate Action & Sustainability
City of Sacramento
cityofsacramento.gov/sustainability

City of
SACRAMENTO
Office of Climate Action & Sustainability

sustainability
starts with us

Rachel Patten

From: Lana Moffitt [REDACTED]
Sent: Wednesday, June 12, 2024 5:45 PM
To: Urban Forest Plan
Subject: Re: Draft plan workshop

Thank you, the workshop did finally load on my Apple device and I entered a couple of comments. My overall reaction to this draft is positive however, given the massive infill development we are now seeing, there needs to be a clear statement that protected tree removal is the exception, not the rule. Developers must make a strong case they truly cannot use a property unless they remove the trees. At the moment they just need to present a design that appears to require tree removal without any encouragement to modify the design. If the city policy was clear that tree removal required more justification perhaps developers would encourage their architects design to spare them. As it currently stands they have invested thousands of dollars in designs before even submitting them and are very reluctant to significantly modify them.

On Wed, Jun 12, 2024 at 4:20 PM Urban Forest Plan <urbanforestplan@cityofsacramento.org> wrote:

Rachel Patten has shared a OneDrive for Business file with you. To view it, click the link below.

 [Sacramento Urban Forest Plan - draft three.pdf](#)

. Hi Lana,

I'm sorry you are having trouble with the online workshop. Attached is a pdf version of the draft plan. You can email me your comments back to be reviewed and considered.

Thank you,

Rachel Patten (she/her)

Sustainability Program Specialist

(916) 808-5016 | rpatten@cityofsacramento.org

From: Lana Moffitt [REDACTED]
Sent: Wednesday, June 12, 2024 3:39 PM
To: Urban Forest Plan <urbanforestplan@cityofsacramento.org>
Subject: Draft plan workshop

I have tried for over an hour to use the workshop presentation. I have used both Apple and Windows devices and three different networks. I have run speed tests on each of the networks and achieved download and upload speeds in excess of 200 mps. Nothing works. A series of displays are shown, all ultimately ending in “binding documents” repeatedly displayed.

I will now search for the SUFD and try to somehow submit comments.

From: [REDACTED]
To: [Urban Forest Plan](#)
Cc: [Mai Vang](#); [REDACTED]
Subject: Comment on the Urban Forest Plan
Date: Monday, June 17, 2024 6:27:41 PM

My name is Jeff Solomon. I am a resident of District 8, an Officer and Board Member of the Meadowview Neighborhood Association, and a founding member of the Meadowview Urban Tree Project, a community based non-profit dedicated to getting more trees in the ground in South Sacramento.

First, let me express my appreciation of the thought and effort that has gone into the creation of the draft plan. I do have two suggestions:

1- As the plan reports, there are 3 avenues available to address improving our tree canopy:

1. The Department of Public Works has responsibility for the trees along our roadways, utilizing the sidewalk strips along neighborhood streets
2. The Department of Youth, Parks and Community Enrichment has responsibility for the trees in our Parks.
3. Regarding trees on private property, the City has no authority to plant trees. Tree growth in this area will depend on the efforts of individual property owners, as well as the efforts of interested non-City organizations.

My issue is that this creates three silos of effort. The City does not appear to want to serve as a coordinator to ensure that these three silos are working in concert. There does not seem to be an effort to set up global standards for best practices, and a coordinated approach.

I would suggest appointing a tree "czar," who would have authority to coordinate activity and practice between these 3 areas.

Maybe better still would be to create a City Department solely for the Urban Canopy. I strongly suggest that the City look into whether the positives that this would bring outweigh any negative impact. I will be following up with my Council Member regarding this.

2 - As a resident of District 8, and being active in getting trees in the ground in South Sacramento, I can say that, based on my experience, I have concerns about meeting the goal of 35% canopy coverage in my disadvantaged area of South Sacramento. This is because of:

- The large percentage of land covered by homes occupied by people of limited economic resources
- The large volume of streets not blessed with sidewalk strips, on which the Department of Public Works could plant and maintain trees

To achieve the stated goal, I believe there will have to be a sustained education and marketing effort to activate the community, as well as an organized effort between private organizations to pitch in with expertise, manpower, and other resources. The one thing that the City could do is to act as a clearing house and organizer, as well as help with funding. I see no appetite for this involvement in the current plan. I urge the City to take a more proactive role in this. Without the City's leadership, neighborhood property planting may be, in my opinion, disorganized, underfunded, and ineffective.

Thank you for considering my thoughts,

Jeff Solomon

Rachel Patten

From: Tyler Wunsch [REDACTED]
Sent: Monday, June 17, 2024 11:52 PM
To: Urban Forest Plan
Subject: Re: City of Trees -- Urban Forest Plan

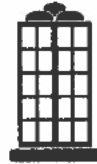
Hi Rachel,

Thank you for your feedback. I am super impressed that you responded to my inquiry and also I must say I am also really impressed by the community engagement and civic showing up around the Urban Forest Plan. I recently met Katie DeMaio at a River District event and learned a lot more about the plan.

I am planning to leave more comments but I also wanted to show you a community initiative I am working on to light up the dead and dry sidewalk streetscape natural planter boxes between the sidewalks and the streets, which some people call planter strips, others call hell strips, and what I call [Front Yard Farms](#). I am trying to build out a pollinator-friendly corridor from my house at 17/18th and P Street and Fremont Park. I think it's super important to prioritize trees for the urban canopy and mother nature's A/C decreasing the concrete heat island effect, but it's also wonderful to light the spaces up with native plants, drought-resistant and drought-tolerant succulents, cactis, and aloes, and really whatever anyone wants to plant. I rent at my place, and I asked the landlord and she gave the green light go ahead which then was transformed into [this](#). I am getting buy-in from neighbors and businesses and building out a new garden now. Here's a picture from Instagram of my place before and after... Just wanted to let you know and maybe we can work on a wider city initiative for these spaces to add beautification, civic pride, community, and sustainability.

I took a photo of Katie doing the good work and told her I would send it to you so it's also attached ;)

Best regards,
Tyler



June 19, 2024

Lucinda Willcox , Assistant Director
Department of Public Works
915 I Street Room 2000
Sacramento, CA 95814

RE: Urban Forestry Plan

Dear Ms. Wilcox,

Sierra Curtis Neighborhood Association (SCNA) and Curtis Park residents have a long history of protecting and preserving trees in our neighborhood. Going back to 1993 when neighbors raised \$6,500. for an arborist evaluation of the 281 William Curtis Park trees. Since 2008 SCNA has spent over \$40,000 to protect the park's English elms from Dutch elm disease. Over the years there have been tree replacement plantings in the park to sustain its lush canopy.

SCNA played a key role in the development of the 72-acre Crocker Village site. Over 300 trees were removed for this project of which 147 were deemed heritage trees. SCNA fought hard to save as many trees as possible. In the end the City of Sacramento Urban Forestry section required Petrovich Development to preserve just 13 valley oaks at the north end of the site which abuts Portola alley. However, after the homes were built Urban Forestry approved the removal permits for two homeowners to remove a valley oak on each of the properties.

Even though SCNA was not invited to be on the Partner Advisory Committee we still want to be involved in the Urban Forest Plan.

Listed below are comments with regards to the Urban Forest Plan

- SCNA supports increasing city-wide tree canopy from 19% to 35% by 2045
- SCNA supports targeting planting efforts in neighborhoods with the lowest canopy levels and the most socio-economically vulnerable residents
- To achieve the plan's goal of preserving existing trees SCNA suggests a minor change in the tree ordinance that would preserve trees on development sites (attachment A)
- Goals, objective, and strategies are not supported with specific details on how to achieve them
- This plan does not address operational functions of maintaining the urban forest

- There was no mention of forming a Tree Commission to review and aid in setting policy provide program feedback, and protect the community's urban forest interests
- This plan should address leaf surface area in addition to canopy coverage since this assessment more accurately defines how much carbon dioxide sequestration is occurring which is critical in tackling the climate crisis.

Apart from the Urban Forestry Plan SCNA has concerns about the Urban Forestry tree removal notification process. The 15-day notification period is challenging for SCNA and other neighborhood associations who meet monthly. Could it be extended to 30 days, which was the removal notification period prior to 2006? The removal notification should include species and diameter to avoid any confusion when a property has more than one private protected tree.

Thank you for this opportunity to provide input on Sacramento's urban forest.

Sincerely,

A handwritten signature in black ink, appearing to read "John Bailey", written over a horizontal line.

John Bailey

Board President, Sierra Curtis Neighborhood Association

Rachel Patten

From: Francesca Reitano [REDACTED]
Sent: Thursday, June 20, 2024 4:24 PM
To: Urban Forest Plan
Cc: Eric Guerra; William J Antinetti; Philip Norton; [REDACTED] Elmhurst Neighborhood Assoc
Subject: FINAL CORRECTED VERSION: Comments on Sacramento Urban Forest Plan

My apologies. Please delete other versions. I had several wrong email addresses in the letter and the addressees. - Francesca

Re: Comments on the Draft Sacramento Urban Forest Plan

The Elmhurst Neighborhood Association is in support of the proposed Sacramento Urban Forest Plan (SUFP) in principle, and we support its goals. However, at this point it is aspirational. It lacks implementation measures, performance standards and metrics, and public accountability on funding sources and expenditures.

Trees provide multiple benefits including reducing urban heat island effects, decreasing flooding in heavy rains (reducing storm runoff by helping water drain into our underground aquifer), sequestering carbon dioxide (the older and bigger the tree, the more sequestration), reducing energy use in hot weather, using transpiration to cool the air around them, cleaning air pollution (a public health issue, especially in under-canopied neighborhoods), and making it safe for people to walk or bike to their destinations on hot days.

- **Critical Infrastructure.** Our urban forest is critical infrastructure and must be put on the same public service level as sanitation, roads, water, police and fire, with transparent budget reporting. The need is critical - as a matter of public health (reducing pollution, heat is the number 1 environmental killer), and climate resilience. This is not reflected in the city's budget. Both General Plan 2040 and the Climate Action and Adaptation plan rely heavily on urban infill and reducing automobile use. Our tree canopy needs to be on equal footing.
- **Preserve and grow canopy coverage in planning and development.** Page 39 of the SUFP draft states that "trees in R-1 zones make up 49% of all the trees in the city." According to city documents, 43% of the city's land is in residential zones. Without appropriate safeguards, adding density in residential zones in the form of Missing Middle Housing and Transit Oriented Development will result in loss of mature trees, and space to plant canopy trees that provide leaf coverage. Even with careful design standards, a tree and a structure cannot occupy the same space. The SUFP merely calls for "encouraging" developers, and in several places "incentivizing" developers. Without a carrot-and-stick approach, incentives will not save our canopy, and "encouraging" developers is weak tea at best. As Elmhurst is mostly in a Transit Oriented Development Zone, with a new Floor Area Ratio of 2.0, we are concerned about protecting and growing our canopy.

- **Protection.** The current tree protection ordinances in Title 12 are not protecting our canopy from development. It is important that Title 12, as well as Title 17 of the Planning and Development Code contain robust tree protection provisions and measures such as leaving meaningful planting space in project design and requiring front yard trees that shade sidewalks in new development projects. With the state and the city increasingly requiring many types of projects to be approved ministerially, objective design standards that protect and provide planting space for canopy trees are crucial. It is the job of developers to monetize every square foot of the lot. It is up to the city to protect and grow our canopy.
- **Appeals of tree removals.** Neighborhood association boards meet once monthly and 15-day appeals do not allow sufficient time for public participation. The appeal period should be 30 days at a minimum. Notices should be posted on both sides of city trees scheduled for removal so that they can be seen from the sidewalk and the street side, easily visible to neighbors; the diameter and species of the tree should also be posted. The appeal process for private protected trees is not transparent; the required appeal form should be posted online and should be able to be submitted by e-mail or electronically, as well as the required fee. The fee is too high, thus discouraging public participation, and should be waived for community groups and neighborhood associations. Most importantly, the appeal process at this point is performative. The process does not allow for oversight: for city trees the Urban Forester that approves removals also makes the final determination upon appeal, and for private trees the same hearing officer has been used for years. Virtually no appeals are sustained under this system. We are sure that more trees could, and should be saved. The city will not allow bolting and cabling to save trees, which private arborist do routinely under the ANSI standards. The city needs to assure that every effort is made to save a tree before it is removed.
- **Equity.** Creating tree canopy equity across neighborhoods will require new tools, new funding (including grants) and new partnerships with nonprofits. The SUFP provides lip service. Planting alone is performative and will not provide equity for under-canopied, low-income Priority Intervention Areas (PIA) as the challenge of life cycle cost is most strongly felt in PIAs, which are over 50% rentals. Many PIA neighborhoods were planned without landscape planting strips for city trees, and the streets are not shaded. Pavement absorbs and retains heat, and emits greenhouse gases, which are public health and climate issues. The SUFP has no plan for how to shade these under-canopied streets in PIAs, and in 1990, the city abandoned front yard trees in PIAs that it used to maintain.
- **Adequate funding.** It is clear that the city does not have adequate funding for the SUFPs goals. The main funding mechanism is Landscape and Lighting fees, imposed as property taxes. There is no funding from the City's General Fund. The draft SUFP says that,

"These funding levels will not be sufficient to achieve the ambitious canopy and climate resilience goals of the City, increase tree planting efforts, retrofit and install irrigation, increase maintenance capacity as canopy increases,

support unplanned emergency response, and enforce key ordinances.” (SUFP, at p. 62.)

- **Transparency.** The public needs more transparency as to the Urban Forestry budget and other budget mechanisms that support our canopy - not just numbers, but detail and accountability as to how it is spent.
- **Tree “czar” and Tree Committee.** We champion installing a city tree “czar” in the Mayor’s office, that will oversee implementation measures for the SUFP, coordinate city departments and nonprofits, and ensure that grant funds for implementing the SUFP are a priority. The city should establish a tree committee to work with the tree czar and provide oversight for the funding and implementation of the SUFP.

As said previously, we support the goals of the SUFP, but it does not provide an adequate road map as to how we will get there. Getting there is crucial. Please enter these comments into the public record.

Best,

Elmhurst Neighborhood Association
Board of Directors



TERRA NOVA PLANNING & RESEARCH, INC.

June 20, 2024

Ms. Lucinda Willcox & Ms. Rachel Patten
Department of Public Works
City of Sacramento
915 I Street, 2nd Floor
Sacramento, CA 95814

RE: Sacramento Urban Forest Plan Comments

Ms. Willcox and Ms. Patten:

On behalf of Citizens for Positive Growth & Preservation (CPGP), we are providing the following comments on the City's Draft Urban Forest Plan.

CPGP works to improve the livability of Sacramento's historic neighborhoods, and commends the City on developing the Plan and planning for the expansion of the City's tree canopy to decrease the heat island effect, preserve and expand shade, and lower the City's carbon footprint. In reviewing the Plan, however, there are several areas that CPGP believes require attention to make it effective and assure that it meets its goals. CPGP's concerns are enumerated below, and focus on the *Implementation Strategy* section of the plan, since that is where goals, policies, and actions are summarized. The concerns also apply to the associated policy or program in the *Policy and Program Framework* section.

1. General Comments: Throughout the Plan, CPGP is concerned with the lack of specificity, including (specific policy and program concerns are provided in greater detail below):
 - a. Specific, annual metrics are lacking. As detailed below, if the City intends to add 100,000 trees in the next 20 years, specific and very targeted goals must be met for the Plan to be effective and implementable.
 - b. There does not appear to be any accountability for not meeting goals and targets.
 - c. The City should implement an annual reporting program, similar to the State Department of Housing & Community Development Annual Progress Report (APR) for Housing Elements. That State requirement assures that every city and county tracks its progress in achieving its housing mandate. The same type of reporting as it relates to trees should be implemented to track the Urban Forest Plan and provide transparent and accurate reporting to the City Council, and most importantly to the residents of Sacramento.
2. The over-arching goal of the Plan is to increase tree canopy to 35% by 2045. As described in the Plan, that will require the planting of 100,000 trees. The policies, however, are too broad and undefined. Specifically:

-
- a. Policy 1.1.1: The policy “strives” to achieve the 35% canopy coverage goal, but provides no metrics to gauge performance. At a minimum, the policy should include firm targets for annual tree planting for both public and private trees, and should include a reporting program to track progress. As currently written, the Plan could be in place for 20 years with no effective implementation and no accountability.
 - b. Policy 1.1.2: The Plan has a 20 year horizon, and the first five are to be spent establishing a planting plan. That represents 25% of the Plan’s horizon. If the Plan is to be effectively implemented, the planting program should either be included in the Plan, or must be completed within a year of adoption of the Plan.
 - c. Policy 1.1.3: The policy is too broad to be effective. It should include firm annual metrics for street tree planting, including replacement of dead or dying trees, planting of new trees on existing streets that lack street trees, and planting of new trees on new streets. To make it more effective for new project streets, the City should modify its Zoning Ordinance to include specific, quantified requirements for street tree installation for new projects.
 - d. Policies 1.2.1 through 1.2.4: As with Policies 1.1.2 and 1.1.3, these policies lack metrics and have too long of a window for implementation. The City is currently seeing tremendous growth in private development. For the first 5 years of the Plan’s implementation, none of these development proposals will be required to implement substantial tree planting, because the changes to the City Code will not exist. Further, since no minimum requirements are described in the Policies, there is no way to know that the changes in the Code will be effective. Without specific guidance in the Plan, there is no guidance for the Code amendments. For example, what size of tree should be required to assure full maturity in 15 years? What spacing is the minimum to achieve the Plan’s goals? What maintenance and replacement requirements must the Code include to assure effective implementation?
3. The protection of existing trees is not sufficiently supported by the Plan’s policies.
 - a. Policy 2.3.1 and 2.3.5: The Policies again have no metrics, and does not provide sufficient direction to assure that the City’s Tree Ordinance (Chapter 12.56) is modified to protect existing trees. The Tree Ordinance currently is simply a permitting process for the removal of trees. The Policy does nothing to remedy that – using words such as “consider” and “where feasible” rather than “require” and “for all new projects.” There are no substantive standards in the Ordinance for tree preservation, whether private or public. The Plan should include specific standards and conditions under which the preservation of trees is required (whether based on diameter, species, shade value or other standards). All of these minimum standards should be included in the Plan, and as numeric standards that are clear to the developer or property owner. Without putting preservation as the first priority in the Tree Ordinance, it will continue to be simply a tree removal permit process. Similarly, the changes to the Ordinance must include replacement standards. The replacement of a 20 year old, 30” diameter tree with a 15 gallon tree is not adequate. Again, specific numeric standards should be imposed, and a minimum tree size must be required. Finally, and importantly, there are no standards at all in the Tree

- Ordinance for trees on commercial or industrial property. The same level of protection must be afforded to these trees if the City is to achieve its goals for canopy coverage.
4. The Organizational Best Practices Strategy (3.1) should add a policy that requires that all City personnel involved in the maintenance of trees undergo training by a professional arborist on proper pruning and tree care. Without such training, City maintenance crews do not understand how to care for trees to assure their long term health.
 - a. Policy 3.4.1: This Policy must include relocation as an option. As currently written, it is clear that a tree removed for either a City project or a private development is assumed to be destroyed, with no hope of relocation.
 5. As is the case with most of the Plan, Strategy 5.1, Program Funding, lacks specifics or metrics. In this section in particular, these are critical. The Plan makes no commitment to minimum funding levels, nor does it define which City department will be responsible for grant-writing or budget management. It may be the intent of the City to maintain these tasks in the departments where they have traditionally occurred, but since past practices have led to a reduction in tree canopy, it seems critical that the City commit to aggressively pursuing grants and other funding by assigning the tasks to a specific, centralized staff person or department. CPGP would also strongly recommend that words such as “encourage” and “whenever feasible” be replaced with affirmative actions that show that the City’s commitment to trees is substantial.

In conclusion, CPGP commends the City for its efforts, and hopes that in preparing a final document for review by the City Council, City staff strengthens the Plan to assure that Sacramento restores its place as “The City of Trees.”

Sincerely,



Nicole Sauviat Criste
Principal



In response, and to advise of future public hearings, please communicate via email [REDACTED] our postal address is [REDACTED]

June 20, 2024

Comment on Need for Greater Transparency and Accountability for the Urban Forestry Program. Please include this as a public comment on the Public Review Draft of the Sacramento Urban Forest Plan

Conduct Annual Urban Forest Program Evaluation with Transparency and Reporting

Citizens deserve clear information on the status of our UF and tree canopy. The City needs to set specific goals and specific target dates for reporting, and then require reports on trends with transparency and accountability.

Urban Forestry is a scientific enterprise. The City needs to build and maintain the databases which will enable sound program evaluation and analysis of how the UF is changing. If this can't be done in Urban Forestry, it should be done in the Sustainability Office.

The Year One – Tree Ordinance Update, May 1, 2018, was a start that was abandoned. The Report refers to: 1) total tree permit applications; 2) public notice for removal of 73 City trees or Private Protected Trees; 3) removal of 64 City trees; 4) Planning and Development discretionary permits; 5) two Public Project tree removals; 6) mitigation fees for 25 tree removals. The Report calls for annual updates (which didn't happen) below are recommendations for the annual report.

The City's Budget Report typically does not report on the Tree Replacement Fund and what is achieved with it. The Year One Report states that, "The tree planting and replacement fund obtained \$181,000 dollars from three permits that involved the removal of a total of 25 protected trees." The Annual Report should disclose all mitigation fees and the number of trees to be mitigated. It should disclose also where the mitigation funds will be spent. Those mitigation trees should be tracked to ensure that they are cared for in the crucial first 3-5 years of growth.

The Annual Report should present a comprehensive report on tree removal permit applications, disposition, non-emergency trees removed in each category (private permits, private development projects, parks, other city projects, state projects) and tree replacements in each category, and other expenditures from the Tree Replacement Fund sufficient to show how the funds are being spent.

The City cannot assess its urban forestry performance without accounting for the removal of canopy. The Report should account for all tree removals in the City of Sacramento for reasons other than "imminent danger to public safety" that the City has approved or conditioned for removal, and all tree replacements linked to tree removals.

The Report should enable the public to account for: the annual loss of the tree resource; the cumulative loss or increase of tree canopy over time; and quantifying the tree replacement effort. We recommend that tree removals and tree replacements be documented in a database that enables third party analysis in addition to an annual narrative where categories may change from year to year. This should include species and size, both height and diameter at standard height (DSH). For public trees, this data can be analyzed in conjunction with the existing database of city trees. For private and other trees, it will at least provide a record of what has been removed and what is being planted so that trends can be identified over time.

Regarding the loss of city-owned trees, the Report should quantify tree removals for private development projects, and public development projects, including The Sacramento Housing and Redevelopment Agency and Capitol Area Development Authority and other public entities. Removal of city park trees should be a separate category.

Regarding the removal of Private Protected Trees, the Report should disclose how many have been permitted for removal, and, for each tree, if in lieu fees were a condition of the permit. Also, for each tree removal permit requiring an in-lieu fee, has the fee been paid.

In addition to annual reporting, Private Protected Tree removal permits on residential lots should be posted on the UF website so that the public can know which trees are permitted for removal from private property. These posts should include trees species, DBH, and estimate of height. Also, Private Protected Trees, Removal Permit applications should be posted on the UF website.

City Should Assign Performance Evaluation and Greater Autonomy, Staffing, and Authority to Manage UF Partnerships to the Office of Sustainability to Provide Public, Council and City Manager with Oversight of Urban Forestry

Urban Forestry is located in the maintenance side of Public Works because the Landscape and Lighting Funds are spent on this function. Yet the General Plan, SUFP, and Climate Plan expect much more in terms of both performance and evaluation. UF Section Budgeting is not transparent nor is it fully disclosed in the city budget documents. Funding needs to be transparent.

The City must partner with other governmental and private entities operating in the City to preserve and to enhance the canopy. This includes school districts in the City, the County, California State University Sacramento, public utilities, and the State of

California. A particular issue is that the City is not advised of proposed city tree removals by the State for its projects within City limits until very late in the development process, making preservation much more difficult and expensive than if it the City were notified as early as possible in the design process. City must succeed in attracting much more grant funding to support unshaded neighborhoods in growing and maintaining canopy.

Rachel Patten

From: Anushka Kalyan [REDACTED]
Sent: Friday, June 21, 2024 10:31 AM
To: Urban Forest Plan
Cc: Lim Luz; Kate Riley
Subject: ECOS EJ SUFP Comment Letter

Hi there,

My name is Anushka Kalyan and I'm a high schooler in the Sacramento area with the Environmental Council of Sacramento (ECOS). I'm submitting a comment letter for the SUFP on behalf of the ECOS Environmental Justice Team, along with Luz Lim (cc'd), the other co-lead of the Team.

Here are a few comments we have:

1. The plan should include mention on how maintenance of the trees is going to be prioritized, especially in environmental justice "priority" communities. While we appreciate that the plan emphasizes priority communities, we stress more specificity as to a cost-sharing program/who will be performing maintenance in long-term upkeep of the canopy. It is particularly important to specify who will be performing maintenance in areas of high rental turnover.
2. While we appreciate the efforts of the SUFP to increase canopy in low-income areas, we question the deliberate usage of the language "bolster the efforts" on page 49. Does this mean that SUFP officials will encourage private property owners to plant and upkeep trees on their own responsibility? Considering that residents are included in the list of groups that are growing canopies, how will the SUFP ensure that full financial and logistical support is given to especially low-income residents instead of transferring responsibility to them?
3. If certain nonprofit entities were to increase tree canopies, especially in underserved communities, through their own programming, the SUFP should consider implementing a grant program or a similar incentive to support such groups.

Please let us know if you have any questions or if we can further clarify any of our points. Thank you so much!

Best,
Anushka Kalyan and Luz Lim

Rachel Patten

From: Anita Bhatia [REDACTED]
Sent: Friday, June 21, 2024 3:29 PM
To: Rachel Patten
Subject: Feedback on Urban Forestry plan

Hi Rachel –

Love the comprehensive Urban forestry Plan. It provides a good perspective with data, history, key players and issues. Though concerned it is not very definitive on recommendations.

Aware that with a report of this magnitude, it is easy to get buried in the noise(miss forest for the trees!). I have consolidated my feedback on what feels like the most critical factor – city sidewalks.

The plan recommendation - planting of 25000 trees a year - is an admirable and necessary goal, given the urgency of climate crisis.

What is lacking is how it would be achieved – in tangible, measurable metrics.

Section – Who manages Urban trees – on Page 54 is a good starting point which consolidates the key contributors.

Schools, parks and city properties are listed as possible locations. As are private residences. Would like to see a percentage of annual goals allocated to each of these categories.

For example – there are 81 schools in Sacramento (<https://www.scusd.edu/our-district>). Assuming 50 trees per school, we might get 4000 tree contribution to the goal.

The elephant in the room is the city sidewalks. These are an **abysmal maze of heat islands all over the city**, beyond the 3 square mile or so of central core. The plan document rightly identifies tree canopy as Infrastructure. Lack of trees on sidewalks effects everyday quality of life of every person.
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yjr ujwFyzwj%&{jw%5¶B

Concerned that the report, **does not strongly recommends aggressive scaling of Street Trees program**. Ideally would like to see 30-50pct of the goal for planting and watering be owned by the Street Trees program run by the city. The budgets are likely to be a constraint, but the program has potential to produce a much higher ROI per dollar – since it already has well established processes (planting team/watering trucks/pruning/tree care teams).

Planning document, by definition, requires an honest assessment of situation and provide concise recommendations. Hoping the critical contributory factors for achieving the goal are sufficiently amplified.

Thank you,
Anita

From: SCNA Board President [REDACTED]
Sent: Thursday, June 20, 2024 12:13 PM
To: Lucinda Willcox <lwillcox@cityofsacramento.org>
Cc: Bruce Pierini [REDACTED]
Subject: Urban Forest Plan

Dear Ms. Willcox,
Please find attached comments on the Urban Forest Plan from the Sierra Curtis Neighborhood Association. We very much appreciate the opportunity to provide input on this important matter.
Sincerely,

John Bailey
President
SCNA/Sierra 2 Center for the Arts & Community
[REDACTED]
[REDACTED]

Attachment A

Chapter 12.56.050 Tree Permits

B. Issuance for Private Protected Trees

1. The director shall issue the tree permits for removal of private protected trees if the director approves the tree replacement plan and the director finds:

a. That the tree must be removed to use the property for any use permitted as of right or by discretionary permit under the Planning and development Code for the zoning district in which the property is located, and the use could not be made of the property unless the tree is removed.

Proposed language

a. That the private protected tree must be destroyed or relocated to use the property for any use permitted as of right and that the use could not be made of the property unless the private protected tree is destroyed or relocated taking into account any modifications or revisions to the proposed use that would effectuate its basic project objectives and also preserve the tree.

Rachel Patten

From: Daniel Pskowski [REDACTED]
Sent: Friday, June 21, 2024 2:58 PM
To: Rachel Patten
Cc: Kate Riley
Subject: Urban Forest Plan Comments
Attachments: Ordinance Language for Urban Forest Plan June 2024.docx

Good Afternoon Rachel,

I wanted to send my comments directly instead of using the webpage. I was the sole Sacramento city arborist from 1990 until 2005. I worked on the city's original Urban Forest Management Plan that was adopted by the city council in November 1993. As a city employee I was not invited to participate when the urban forest plan process began in 2017. This is unfortunate because having lived and worked in Sacramento's urban forest for the past 33 years I have an in-depth working knowledge of the trees. I retired from the city in 2020 but am very active helping residents and neighborhood groups save trees. Everything I have ever done has been pro bono. It is my way of giving back to the community which supported me while a city arborist in the fight to preserve trees.

The goals, objectives, and strategies laid out in the plan were well thought out. However, there are no specific details on how to get there. To achieve the plan's goal of preserving existing trees, why wasn't it addressed with a recommendation to modify the tree ordinance? Urban Forestry (UF) has been telling residents for several years they are required to approve the tree removal on development projects per the tree ordinance. Attachment A is this section of the ordinance and the proposed language which would prevent developers from clear cutting sites.

On the canopy coverage analysis what I would have liked to have seen was the aerial photos taken of the entire urban forest in 1988 by Radman Aerial Surveys used as a base line. It would have reflected a different picture than one in the plan. Sacramento has lost numerous trees to climatic conditions (1990 freeze & various droughts), Dutch elm disease, mistletoe infestation etc. since when I first arrived. Over 20,000 Modesto ash (*Fraxinus velutina* 'Modesto') were planted in the subdivisions constructed in the 1950-60s. It is the main reason for the canopy inequity in South Sacramento because the majority of these trees were removed due to mistletoe infestation. What's puzzling is on page 45 under the discussion of canopy coverage it states canopy has increased in every zoning type, planning area, council district and major park. I can't see how it has increased downtown with so many trees being removed for development. In addition to all the CalTrans trees removed along Hwy 99, Hwy 50, and Business 80. The 1988 aerial photos of these areas are important to get an accurate assessment. Urban Forestry should have the entire roll of these photos and if not Radman Aerial office is right down the street from the city's 24th street corporation yard.

The plan does not address operational functions of maintaining the urban forest. This was a key component of the first urban forest management plan. It is the reason why the city council appropriated the \$150,000. in funding for its development in response to a three year backlog on pruning requests. There was an economist on the consulting team to specifically look at operations and funding. Currently, UF has a backlog of over 900 on-demand pruning requests. These are requests for low limbs over the street, limbs rubbing on roof, heavy limbs etc. that the pruning supervisor determined can't wait until the block pruning cycle returns to that area. Furthermore, UF has halted all stump grinding due to lack of funds. There is a backlog of 550 stumps and when stump

grinding starts after the new budget on July 1 the timeline is 12 to 24 months. UF has never experienced this problem where they are unable to perform basic tree maintenance. The issue is Maintenance Services has been reallocating UF funds for a very long time. One example is in 2007 when UF transferred to Public Works the 3 million in annual general fund money it received was redistributed.

A previous source of funding for UF was a tree planting fee for developers. I am unsure when the city stopped collecting this fee. But on residential sites developers paid \$100. fee for every single family residential lot. Then UF would plant a tree once the resident moved into the home. This fee was low but UF was never interested in increasing it. During the 2010 Permit-Gate scandal investigation it was brought to the City Attorney's office attention that developers had not been paying this fee. This resulted in a 1.5 million dollar augmentation to UF budget. However, the Public Works Director reallocated those funds.

A developer tree planting/maintenance fee should be reinstated. Even though developers plant the street trees as part of their projects the fee could be used for follow up maintenance: replanting trees that have died, restaking/removing the tree stakes, and most importantly follow up structural pruning. The first ten years are so critical and reap huge benefits. It's heartbreaking to see a 15 -20 year tree removed because of a structural failure that should have been addressed within the first ten years.

There is no mention of forming a Tree Commission to review and aid in setting policy, provide program feedback, and protect the community's urban forest interests. It could also assist UF to recoup lost funds. This was one of the recommendations in the 2003 Sacramento Tree Services Best Management Practices Review and Report prepared by Robert I. Tate Associates. There was a move to form one when a Parks and Recreation Commissioner formed a Trees Subcommittee around 2007 but UF indicated there was no need for it and without their support the subcommittee dissolved.

Finally, on the Urban Forest Plan web page it indicated this plan was paused because UF wanted this plan to align with the 2040 General Plan and the Climate Action Adaptation Plan. Those two plans include sections on Tree Canopy Expansion, Tree List, Urban Forest Maintenance, and Planting but no mention of preserving existing trees. This is unfortunate because trees are our first line of defense in combating climate change. There were other concerns with both those plans that I addressed in a letter to the mayor and city council which they received on February 27, 2024 and can forward that to you if you are interested.

Thank you for this opportunity to provide input

Sincerely

Daniel Pskowski
Sacramento City Arborist (1990 - 2020)

[REDACTED]

Attachment for Urban Forest Plan

Chapter 12.56.050 Tree Permits

B. Issuance for Private Protected Trees

1. The director shall issue the tree permits for removal of private protected trees if the director approves the tree replacement plan and the director finds:

a. That the tree must be removed to use the property for any use permitted as of right or by discretionary permit under the Planning and development Code for the zoning district in which the property is located, and the use could not be made of the property unless the tree is removed.

Proposed language

a. That the private protected tree must be destroyed or relocated to use the property for any use permitted as of right and that the use could not be made of the property unless the private protected tree is destroyed or relocated taking into account any modifications or revisions to the proposed use that would effectuate its basic project objectives and also preserve the tree.

Rachel Patten

From: Lucinda Willcox
Sent: Friday, June 21, 2024 6:01 PM
To: Urban Forest Plan
Subject: Fwd: SUFP (Urban Forestry Plan)

Begin forwarded message:

From: Bake One [REDACTED]
Date: June 21, 2024 at 4:09:35 PM PDT
To: Lucinda Willcox <LWillcox@cityofsacramento.org>
Cc: Richard Stevenson [REDACTED]
Subject: SUFP (Urban Forestry Plan)

SUFP (Urban Forestry Plan)

?

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Saved: Wed 6/19/2024 8:12 PM

Hi Lucinda,

I was glad to see the breakdown of how urban trees benefit our community on pages 13 and 14. I worked as the city arborist who did most of the plan review work from 2005 to 2017. While I was there, chapter 12 and chapter 17 compliance was generally very poor. There are many reasons for this, but when development was involved, it was primarily a lack of oversight from city entities that allowed projects to go forward when they did not meet code requirements. Here are a few problems that I hope will be addressed in the new SUFP.

Chapter 12:

- Construction that isn't consistent with existing building setbacks and step backs has routinely been approved. Such projects often severely impact large existing street trees and compromise or eliminate canopy and planter space for future trees.

- Development applicants often initially propose a project that has less tree impact than their final proposal. When this happens revisions that increase tree impacts are often never reviewed and some applicants look for ways to exploit possible gaps in the reviewing process.

- Nearly every new project and right of way dining encroachment also significantly reduces street tree planter dimensions and city tree canopy potential. Many projects have removed existing street trees and installed utility vaults in the city right of way planting strip. As a

rule of thumb, we planted large canopy species trees at 40' on center this was often tossed aside for a wide variety of other questionable encroachments. As a result, in many locations the spacing of street trees is now 100' or more on center.

- Project contractors often install landscapes or tree planting plans that are not consistent with code requirements or the project conditions of approval and are allowed to remain out of compliance indefinitely.

- Park strip planters are often paved over w/ no permit. Many planters are filled with rocks that create poor growing conditions for street trees. Both practices should going forward be explicitly defined and treated as code violations.

- On project sites city inspectors almost never looked at tree planting plans and Code Enforcement staff never reported or looked into chapter 12 violations while I worked as a city arborist.

- When city or private protected trees are removed, off site replacement credits often allow for tree planting in parks. Offsite city right of way improvements that allow new trees to be planted in areas with poor canopy coverage should be required instead.

- There is often a failure to recognize that establishing adequate planting space and canopy space for new trees is more important in the long run than preserving existing trees. (A 7'-10' planter width for large canopy species trees, and a 6'-7' planter width for medium canopy species trees should be established as minimum requirements).

- Diameter based monetary penalties for topping or severely injuring city or private protected trees should be implemented to offset damages, and to deter this type of code violation.

- Tree removal permits are often issued w/ no post removal tree planting conditions when replacement planting is appropriate.

Chapter 17:

- The 2003 Parking Lot Shade Design and Maintenance Guideline has a poor species pallet and green lights planter widths that will not allow trees to reach maturity or meet their shade coverage targets. As a result, parking lot shade trees that have lifted the surrounding curb and asphalt often have been removed with no replacement planting.

- From 2003 to 2010 the pruning and removal of parking lot shade trees required a permit. During a 2010 phone call, a city attorney and an Urban Forestry supervisor decided to eliminate any permit requirement for the pruning or removal of parking lot shade trees. A few minutes later all of the blank Urban Forestry parking lot shade tree permits were put in a dumpster.

- In 2006 The Parking Lot Shade and Maintenance Guideline was revised and re-named as The Parking Lot Design and Maintenance Manual. As a guideline, it was in practice regarded as list of suggestions. Most landscape designers did not take it seriously and they submitted plans w/ erroneous shade calculations and poor species selections.

-The Guideline / Manual revision in 2006 improved the species pallet and planter width requirements but was not codified by City Council and most parking lots installed between 2005 and 2017 failed to fully comply with either the Guideline or the Manual.

-A recent analysis found that compliance with the parking lot shade ordinance which was put in place over 40 years ago sits just below 6%. This lines up pretty well w/ what I observed.

-A compliance rate of 6% is abysmal by any metric. Some headway seems achievable if the 2006 manual is codified and the parking lot tree permit requirements are restored. While I worked for Urban Forestry all of the parking lot planting plans I received were redlined to meet chapter 17 requirements. Most of them were revised and approved per Urban Forestry redline and comment, but final completed projects were often not consistent w/ the approved plan. I hope you can succeed where many others have failed.

All the best,
Duane

Rachel Patten

From: Kate Riley [REDACTED]
Sent: Friday, June 21, 2024 2:39 PM
To: Rachel Patten; urbanforest@cityofsacramento.org
Cc: gordon; Jeff Solomon; 'Judith Lamare'; Francesca Reitano; Luree Stetson; Dan Pskowski; 'Karen Jacques'
Subject: Comments from Gordon Mann regarding the SUFP
Attachments: 6_13_Trees4Sac_Chat.pdf

Hello Rachel and SUFP team:

Below is a series of emails from Arborist Gordon Mann regarding the Public Draft SUFP. Gordon has approved submitting these comments, as well as his comments on the Chat for the June 13, 2024, Trees For Sacramento Zoom meeting featuring Rachel Patten, as public comments on the plan. I have removed verbiage unrelated to the Plan. I believe that Mr. Mann's years as a renowned Consulting Arborist nationally and in California provide a unique perspective on our Plan and how to make Sacramento's Tree Canopy thrive. Mr. Mann has served for years as a member of Sacramento Tree Foundation's Technical Advisory Group. He has worked with communities nationwide.

I have attached the Chat from the June 13 Zoom meeting to this email and ask that the entire chat, as well as this email, be included as public comments.

I am also copying to the Trees for Sacramento core group.

Thank you for your attention to this email.

Kate Riley

Trees for Sacramento
[REDACTED]

From: Gordon Mann [REDACTED]
Sent: Thursday, June 06, 2024 3:19 PM
To: Kate Riley
Subject: RE: Link for Sacramento Urban Forest Plan

Good afternoon Kate, in my review of this study, the most canopy is in Land Park at 31.73 and E Sac at 30.62; S Natomas has 25.39, and the lowest are in the 11 to 16% ranges. Increasing to 35% by 2045 will not really solve our problems or improve things.... It does take about 15 years to get trees established and growing to provide the canopy, so the best way to grow our canopy is to grow our existing trees!

It really needs to be further assessed by land use so the City can understand where it needs to focus its efforts. If the north sac or fruitridge areas are very commercial the 15% may not be too far off, where if they are residential and lower income or disadvantaged, a higher priority.

The goal of the canopy % should then guide all their next steps:

Are the efforts we taking in alignment with the goal, or not?

Every decision we make, will it be to grow the trees in the existing and new plantings to maturity and optimum canopy cover goal, or not?

Without the clear acceptance of an overarching goal and path, the work can continue as it is with the heads nodding, yes we are shooting for the goals with the limited resources we have.

From my experience with tree planting nonprofits in the bay area and Sacramento, and strong volunteer corps in Vermont and Ithaca New York (both through constituent conversations) volunteers can do most of the community conversations, education, and volunteer tree planting and young tree pruning using trained volunteers. Many communities do not have professionals, the 6 arborists in Sacramento for over 100,000 trees is limited; and neighborhoods have not received ample city support. Some of the past practices, such as Sue Christian's, could have been handled differently if the goals and priorities were established.

I learned much of this through conversations with arborists from around the world and the Sacramento Tree Foundation's Greenprint, which had the BHAG (Big Hairy Audacious Goal) of doubling the tree canopy over the 6 county and 22 cities Sacramento regions' populated areas, avoiding agricultural competition, while most ag lands do reduce heat island and allow stormwater entry into the groundwater.... The purpose of doubling the canopy by 2025 (from the initial assessment in 2000) was to reduce the lower ground level temperatures by 3 degrees Fahrenheit to improve air quality and reduce the air quality rating from either purple to red, red to orange, or orange to yellow on 50% of the days of the month. High level research from the Forest Service research in Davis and Lawrence Livermore Labs proved this would work. I served for 18 months before the State's budget cuts in 2008 caused grant freezing and layoffs, and the eventual shuttering of the effort in around 2022. But I gained the knowledge and passion for this approach to growing better trees to maturity. The i-tree science data, a free US Forest Service research product, shows the benefits of trees increase over the first 20-30 years and then level off until the costs of maintenance post maturity may start to level off and no longer provide a sustainable return on investment. By the time I started at the tree foundation after 30 years managing agency trees, I already had my personal mission to grow better trees, and this amazing education supported my thought process and how to influence others to make changes for the better.

Unfortunately, the trees don't talk, and only react to human impacts and interventions. So, the current philosophy is: make it easy - plant more trees to solve our problems.

We have strong evidence that the million tree campaigns did not work effectively, and the cost benefit ratio from planting trees that do not grow is very low to negative. The billion and trillion tree planting campaigns will not work either if the trees don't actually grow. Growing trees in populated areas to maturity require more human care and adequate space that has been compromised with the large buildings on lots, and squeezing out the areas to grow trees. They can still be planted, but if they don't grow beyond 15 years, they will not contribute to a canopy increase. Continuing to remove and replant trees will not be a sustainable solution to the needs people have in our communities.

I would much rather have a large BHAG we don't meet but make substantial progress than a small goal that we may meet and it will be lower than our BHAG efforts.... Plus the BHAG sets the stage for all the continuing activities. The most amazing BHAG was JFK, we will put a man on the moon by the end of this decade! It worked.... The end results are our cell phones having more capacity than the 1-ton computers that took up a whole room or floor at the Houston NASA site.

It is a big challenge, and there is probably not the funding needed. So, there are other ways to make a big goal happen. If we are trying to set a small goal we think we can fund, my experience has been the municipal budgeting process will fall short....

Sorry for the long message, but this is a critical point in a process, setting the goals and objectives for where we are going.

The Europeans are promoting the 3-30-300 goal (Cecil Konijnendijk) where everyone can look out their window and see 3 trees in 100', 30% canopy cover, and have a hectare green space within 300 meters (1,000'). If our neighborhoods had the 30% canopy or greater, those goals are met, and we don't need open space because walking the streets will be like walking in a park.

Sincerely, Gordon

[Gordon Mann Logo here]

GM: Did they have a current %?

KR: 19%. That's from the Davey Tree Company survey in 2018.

GM: Thank you for that information. I hope they put in place a plan to hit that average bases on the growing space available in the different land uses.

KR: They are setting a goal of 35% citywide by 2045

On Jun 6, 2024, at 1:09 PM, Gordon Mann <gordon@mannandtrees.com> wrote:

Thanks Kate, I am sorry that the City is not considering a tree canopy goal - **with goals in each land use type**: commercial, industrial, high density, single family as the space to grow trees to maturity is what is needed for the trees to grow and provide the sustainable benefits to the City.

We see from limited growing space that many trees will not reach maturity as they cause adjacent damages and are removed. In Sue's case, they could have slowly removed the elm, managed it in a lower risk manner and saved money and canopy.

This is the opportunity to review and try and shift the thinking. Once a plan is in place, it will never be adjusted significantly. Once the canopy goals are in place, the pace, speed, and focus or first priorities can be adjusted.

I am so disappointed that more people including CalFIRE are not understanding the proper way to grow trees for benefits and services where people live...

I am delayed in finishing my book that will support this approach to growing trees in communities....

Gordon

16:26:53 From Margot Rinaldo to Everyone:

Welcome to the Trees for Sacramento Call to Action for the Sacramento Urban Forest Plan!

If you have just joined the chat we'd like to get to know you! Please share your name, organization, and councilmember in the chat.

16:28:42 From Margot Rinaldo to Everyone:

Welcome to the Trees for Sacramento Call to Action for the Sacramento Urban Forest Plan!

If you have just joined the chat we'd like to get to know you! Please share your name, organization, and councilmember in the chat.

16:29:29 From Francesca Reitano to Everyone:

Francesca Reitano, Trees4Sac, Save Sacramento Neighborhoods, Elmhurst Neighborhood Association Board member, Residents Against Illegal Fireworks, D6 – Eric Guerra

16:29:51 From Susan Christian to Everyone:

Fran!!!!

16:29:56 From KC Schuft to Everyone:

Hi Fran!

16:30:19 From Susan Christian to Everyone:

It's Sue Christian – to Fra

16:30:30 From Judith Lamare to Everyone:

Jude Lamare, live in Fair Oaks, Trees4Sacto, Habitat 2020

16:30:35 From Francesca Reitano to Everyone:

Reacted to "It's Sue Christian –..." with ❤️

16:30:49 From Francesca Reitano to Everyone:

Reacted to "Hi Fran!" with ❤️

16:30:55 From Francesca Reitano to Everyone:

Reacted to "Fran!!!!" with ❤️

16:30:55 From Katie McCammon to Everyone:

Katie McCammon – 350 Sacramento – District 2

16:31:13 From Jeff Solomon to Everyone:

Jeff Solomon. District 8, Meadowview Urban Tree Project

16:32:05 From Karen Jacques to Everyone:

Karen Jacques Trees 4 Sac, live in the Central City, Council District 4

16:32:11 From Margot Rinaldo to Everyone:

Welcome to the Trees for Sacramento Call to Action for the Sacramento Urban Forest Plan!

If you have just joined the chat we'd like to get to know you! Please share your name, organization, and councilmember in the chat.

16:32:12 From KC Schuft to Everyone:

KC Schuft – Colonial Heights and I ran for City Council D6 this year. I am part of the Colonial Heights Neighborhood Association and formed the CH Neighborhood Coalition. I've lived in CH for 21 years and Eric Guerra is my council member

16:32:12 From Lana Moffitt to Everyone:

Lana Moffitt from Woodlake. Councilmember is Shoun Thao
16:33:08 From Janet B to Everyone:
Janet B from Campus Commons. District 6, Eric Guerra
16:33:35 From Alex Binck to Everyone:
Alex Binck, District 4, Katie Valenzuela
16:33:44 From Marilyn B to Everyone:
Marilyn, District 6
16:33:48 From Susan Christian to Everyone:
Katie Valenzuela
16:35:02 From Judith Lamare to Everyone:
Yay for land acknowledgement!
16:35:12 From Rachel Patten to Everyone:
Reacted to "Yay for land acknowl..." with ❤️
16:35:13 From Luree Stetson to Everyone:
Luree Stetson, Trees4Sac and Upper Land Park Neighbors,
Council District 7 – Rick Jennings
16:38:52 From Mary Ann Robinson to Everyone:
Mary Ann District 6
16:40:31 From Margot Rinaldo to Everyone:
Welcome to the Trees for Sacramento Call to Action for the
Sacramento Urban Forest Plan!

If you have just joined the chat we'd like to get to know you!
Please share your name, organization, and councilmember in the chat.

16:42:41 From Kylan Kegel to Everyone:
Kylan Kegel, Tahoe Park Neighborhood Association member,
District 6 (Guerra)
16:44:19 From Susan Christian to Everyone:
could you speak up?
16:55:40 From Richard Hamilton to Everyone:
how do we reconcile the city's plan with the Army Corp of
Engineers plan to decimate the American River Parkway?
16:59:59 From Francesca Reitano to Everyone:
When will the video of this event be available?
17:01:02 From Francesca Reitano to Everyone:
Before 6/21? or by close of business 6/21?
17:03:07 From Daniel Pskowski to Everyone:
Urban Forestry is funded by Landscape and Lighting funds and
not the general fund
17:03:09 From Katie McCammon to Everyone:
Thank you for putting trees into areas of South and North Sac
that desperately need them. How will the City be managing the upkeep
of these trees? What types of trees will be put in? Will they be
native species?
17:03:11 From Luree Stetson to Everyone:
are all comments submitted before 6/21 going to council, even
if not included into the Plan?
17:03:33 From Margot Rinaldo to Everyone:
How to Public Comment before 6/21:
•Open the SUFP homepage here:

<https://sacramento.konveio.com/welcome-draft-plan-workshop>
There are two ways to Comment on this page:
Click on the "Comment on the SUFP" button to go here:
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the plan

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urbanforestplan@cityofsacramento.org

E-Comment Alternative [Measure U Committee consent calendar
June 17, 5:30 pm]

•https://sacramento.granicusideas.com/meetings/5075-measure-u-community-advisory-committee/agenda_items

17:05:03 From Rachel Patten to Everyone:

Replying to "Thank you for puttin..."

Staff are currently working to accept the grant fund (lots of
admin) and will be identifying the locations and planting plans and
then installing the trees over the next 3 years.

17:05:36 From Katie McCammon to Everyone:

Replying to "Thank you for puttin..."



17:05:46 From Rachel Patten to Everyone:

Replying to "are all comments sub..."

All comments will be tracked, responded to, and made public
when we present the plan to council.

17:06:27 From KC Schuft to Everyone:

I'm curious about tree maintenance too. According to Kevin
Hocker, they don't have the staff or budget to adequately maintain
existing trees now.

17:06:37 From Victoria Vasquez to Everyone:

Reacted to "All comments will be..." with

17:07:44 From Rachel Patten to Everyone:

Replying to "how do we reconcile ..."

This is where partnership come into play. We need buy in from
all other agencies.

17:10:28 From Luree Stetson to Everyone:

Replying to "Thank you for puttin..."

How much money is proposed for trees under Measure U?

17:10:29 From Rachel Patten to Everyone:

Replying to "I'm curious about tr..."

The City spends about \$8M annually maintenance and maintains all City managed trees to industry standards.

17:11:32 From Margot Rinaldo to Everyone:

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17:14:25 From Gordon Mann to Everyone:

Do we know what percent of the city' canopy is on public property?

17:14:45 From Rachel Patten to Everyone:

Replying to "Do we know what perc..."

10% on public, 90% on private

17:14:52 From Francesca Reitano to Everyone:

Replying to "Do we know what perc..."

I

17:15:36 From Francesca Reitano to Everyone:

Replying to "Do we know what perc..."

I've read in city documents that 10% is city, 10% is other agencies (state, county federal, etc.) and 80% is private property, much of it in front and back yards

17:16:48 From Francesca Reitano to Everyone:

We can probably take the slide down and see everyone?

17:17:02 From Judith Lamare to Everyone:

Reacted to "We can probably take..." with 👍

17:18:19 From Margot Rinaldo to Everyone:

Reacted to "We can probably take..." with 👍

17:22:05 From Susan Christian to Everyone:

Lucinda, I also see revision of regulations as a major step toward wise management and decision making relative to existing city

maintained trees. As an attorney I'd like to contribute in that area somehow. Sue Christian

17:23:16 From Luree Stetson to Everyone:

How are you educating commissioners on the importance of retaining trees when new development proposals are approved.

17:23:44 From Lucinda Willcox to Everyone:

Thank you. When we go through the amendment process there will be a public engagement. If you add your name to the Urban Forest Plan email list then we can make sure you're notified when we begin work.

17:24:04 From Susan Christian to Everyone:

Reacted to "Thank you. When we g..." with 👍

17:24:49 From Alex Binck to Everyone:

The plan currently is lacking in specific metrics by which to measure the progress and success of the city's actions and strategies. Will these be developed in subsequent documents or do they fit best in this plan?

17:25:06 From Janet B to Everyone:

Reacted to "How are you educatin..." with 👍

17:25:20 From Gordon Mann to Everyone:

We need to grow the trees to maturity to receive the sustainable benefits from the tree canopy. Planting trees that will not grow bigger than 10 years old and then are removed due to conflicts with concrete or utility will not achieve the long term goal of canopy

17:26:00 From Janet B to Everyone:

Reacted to "We need to grow the ..." with 👍

17:26:07 From Francesca Reitano to Everyone:

Reacted to "We need to grow the ..." with 👍

17:26:21 From Francesca Reitano to Everyone:

Reacted to "How are you educatin..." with 👍

17:27:01 From KC Schuft to Everyone:

Reacted to "We need to grow the ..." with 👍

17:27:20 From Sarah Norris to Everyone:

Reacted to "We need to grow the ..." with 👍

17:30:45 From Lucinda Willcox to Everyone:

I would also note that the City is currently updating its Street Design Standards which includes examining tree spacing, species, planting standards. There will be a public process to review and discuss.

17:31:05 From Francesca Reitano to Everyone:

Reacted to "I would also note th..." with 👍

17:32:54 From Francesca Reitano to Everyone:

Another place for people to get involved is the interim ordinance for Missing Middle Housing which has a tree component for development of MMH projects. It will go to Planning and Design, the Law & Leg Committee, and to council. Because it's an interim ordinance it will be reviewed and adopted at the same meeting.

17:33:13 From Gordon Mann to Everyone:

a broad canopy cover is difficult to plan. What steps are being put in place to create specific canopy cover goals for different land uses – commercial, industrial, residential, multi-residential. The space to grow trees will be different for most land use areas. If commercial and industrial cannot achieve 30%, the residential will need to be higher to hit the average.

17:35:01 From Francesca Reitano to Everyone:

Replying to "a broad canopy cove..."

And the city is planning urban infill in residential zones that have approximately 45% of the city's land, and where a lot of the canopy is. More buildings = less trees without strict objective standards.

17:35:39 From Mary Ann Robinson to Everyone:

Reacted to "Lucinda, I also see ..." with 👍

17:35:47 From Mary Ann Robinson to Everyone:

Reacted to "How are you educatin..." with 👍

17:36:07 From Susan Christian to Everyone:

But is \$8M enough? I have no idea.

17:36:18 From Mary Ann Robinson to Everyone:

Reacted to "And the city is plan..." with 👍

17:36:25 From Lana Moffitt to Everyone:

Reacted to "And the city is plan..." with 👍

17:36:34 From Janet B to Everyone:

Reacted to "And the city is plan..." with 👍

17:36:49 From KC Schuft to Everyone:

Not according to my direct conversation with Kevin. He point blank said they are short staff and budget.

17:37:45 From Judith Lamare to Everyone:

8 years ago we asked for accountability and transparency in what funds are used and what is accomplished each year. City does not disclose fund sources and expenditures at a level that allows accountability

17:38:04 From Lana Moffitt to Everyone:

Reacted to "How are you educatin..." with 👍

17:38:06 From Francesca Reitano to Everyone:

Reacted to "8 years ago we asked..." with 👍

17:38:15 From Gordon Mann to Everyone:

It is possible to perform all the planting by trained volunteers and young tree pruning by trained volunteers. The City can use all their budget for maintaining the large trees. The young trees are rarely pruned by most community staff anywhere.

17:38:34 From Susan Christian to Everyone:

Reacted to "It is possible to pe..." with 👍

17:39:30 From Gordon Mann to Everyone:

The spacing for growing trees need to be large enough for the

mature tree.

17:40:46 From KC Schuft to Everyone:

Reacted to "8 years ago we asked..." with 👍

17:42:42 From Daniel Pskowski to Everyone:

Excellent point Jude

17:42:51 From Susan Christian to Everyone:

Also funding for stump removal. Now there are a LOT of stumps waiting.

17:44:18 From Kylan Kegel to Everyone:

Reacted to "It is possible to pe..." with 👍

17:44:27 From Kylan Kegel to Everyone:

Reacted to "Also funding for stu..." with 👍

17:44:31 From Mary Ann Robinson to Everyone:

Reacted to "The spacing for grow..." with 👍

17:44:56 From Kylan Kegel to Everyone:

Reacted to "The plan currently i..." with 👍

17:45:37 From Susan Christian to Everyone:

The Urban Forestry dept. needs reorganizing so that final decisions are not just made by one person, whose objectiveness may be questioned.

17:46:11 From Francesca Reitano to Everyone:

Reacted to "The Urban Forestry d..." with 👍

17:47:31 From KC Schuft to Everyone:

Replying to "The Urban Forestry d..."

civilian oversight committee

17:47:47 From Susan Christian to Everyone:

Replying to "The Urban Forestry d..."

Civilian and expert

17:48:13 From Lana Moffitt to Everyone:

Is there any oversight of SMUD actions? Their priority if keeping the overhead lines clear. Sadly trees are removed or butchered in the process. Placing those lines underground should be the ultimate priority.

17:49:53 From KC Schuft to Everyone:

Replying to "Is there any oversig..."

in most areas moving power lines underground is very complicated, especially in older areas and will cost in the millions. There are a lot of unknown things underground and it effects private property, and it requires new electrical panels on residences/buildings

17:51:11 From KC Schuft to Everyone:

Replying to "Is there any oversig..."

That is according to a conversation I had with a SMUD employee when they removed 6 palm trees on SF Blvd that they decided would

interfere with power lines

17:51:47 From Gordon Mann to Everyone:

Having the canopy cover goal as the BHAG of really wanting to achieve it, should guide the decisions and policies. Is this decision getting us towards the canopy goal or not

17:52:40 From KC Schuft to Everyone:

I have to hop off. Please keep me in the loop for future meetings and involvement. Thank you! [REDACTED]

17:52:55 From Susan Christian to Everyone:

Reacted to "Having the canopy co..." with 👍

17:53:37 From Lana Moffitt to Everyone:

Replying to "Is there any oversight..."

The city relocated the water lines a few years ago so have a good model. Yes, it's expensive but worth it in the long run. My neighborhood has endured five power outages in the past nine months. The solution to cut down any & all trees is short sighted.

17:54:38 From Howard Levine to Everyone:

In Campus Commons we have about 400 acre "urban forest and have had little support for maintaining significant trees in our PUD. We see the future based on the City's response to development a general disregard for our trees.

17:55:36 From Mary Ann Robinson to Everyone:

Reacted to "In Campus Commons we..." with 👍

17:58:00 From Margot Rinaldo to Everyone:

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17:58:02 From Daniel Pskowski to Everyone:

Replying to "The Urban Forestry d..."

Urban Forestry needs oversight and a Tree Commission is warranted. The commission could help Urban Forestry restore the 3

million dollars of annual general fund that was siphoned off.

17:58:50 From Susan Christian to Everyone:

Sue Christian

17:59:12 From Susan Christian to Everyone:

Sue CHristian [REDACTED]

17:59:58 From Karen Jacques to Everyone:

It would also be helpful if the text in chat were available

18:01:31 From Francesca Reitano to Everyone:

[REDACTED] Francesca Reitano - are we also on the UFP
email list??

18:01:47 From Janet B to Everyone:

Thank you all!

Rachel Patten

From: Heather Fargo [REDACTED]
Sent: Friday, June 21, 2024 5:24 PM
To: Urban Forest Plan
Cc: Karina Talamantes; Lisa Kaplan; Eric Guerra; Katie Valenzuela (City); Caity Maple; Rick Jennings; sThao@cityofsacramento.org; Mayor Steinberg; [REDACTED]
McCarty, Kevin; Judith Lamare; Victoria Vasquez; Julio Lamas; ROBBIE ROBBINS
Subject: Urban Forest Master Plan - comments

Dear Staff:

Thank you for finally releasing the long awaited Urban Forest Master Plan. Although I no longer consider us the City of Trees, I'm hoping we can regain our commitment to it in the future and this plan outlines how we can get there.

Unfortunately, the commitment is not there from the leadership of the city to make trees and canopy a citywide priority. Shade is important to all neighborhoods but is not distributed equally. Additional funding for trees, either through new funding sources or reallocating existing funds is essential if you want to actually implement the plan.

The City also needs to re-evaluate why it provides services such as pruning to the older sycamores, elms, and other trees in Land Park and the Central City but not to anyone in northern or southern Sacramento. It's no longer enough to say it's because there are easements. It's time to fix the inequity.

The Lighting and Landscaping Act is a main source of funding for Sacramento trees and EVERYONE pays the same amount, within their category of residence or commercial. But only some neighborhoods get any direct service from their annual assessment. How is that OK?

As you know, the cost of maintaining trees is one key reason why people don't want to plant trees at their homes. We can't reach the goals you're setting unless we support all trees equally.

I would personally support paying more for the L and L annual assessment, if the funds were distributed on an equitable basis. A plan to offer this option to voters should be in the plan.

My own story - I own a duplex in Land Park, and hired an arborist several years ago to prune the tree as it had limbs hanging over my neighbor's house. As I was watching them start to prune, a city tree crew showed up in a city truck, and had them stop. "We'll do that," they said. "It's a city responsibility." Really?! Good news is I saved \$1000, bad news is that service is NOT offered to most people, and certainly not to my primary residence in South Natomas. I still see those city tree trucks in Land Park but not in my community.

Another commitment that should be in the Plan, is to include funding for the urban forest in any future Transportation Sales tax measure, or any future Park Bond, or others. Trees should be considered critical infrastructure as our world gets hotter.

Trees are as important as roads, and shade actually extends the life of asphalt. In addition, the current Parks Department policy of NOT planting trees in parks, cannot continue. It is public places like parks that can provide those without their own yards a place to cool down.

Our need to replenish our ground water is another reason why trees are so important, and offers another source of potential funding that other cities have used.

Although the city has a good Shade ordinance for parking lots it is not enforced, leaving most parking lots intolerable in the summer and adding to the heat island effect. Please require Code Enforcement enforce that the required trees are planted, maintained and replaced if they die.

I appreciate the effort of the plan, but without a realistic funding strategy, it can't be implemented.

Please strengthen the implementation portion of the plan so that equity is a realistic goal.

Thank you,

Heather Fargo
Former Sacramento Mayor

Rachel Patten

From: Luree Stetson [REDACTED]
Sent: Friday, June 21, 2024 2:21 PM
To: Urban Forest Plan
Cc: Kate Riley
Subject: Urban Forestry Master Plan -- Public Comments

- **PROMOTE TREE CANOPY AND SAFEGUARDS IN PLANNING AND DEVELOPMENT.** Page 39 of the SUFP draft states that “trees in R-1 zones make up 49% of all the trees in the city.” According to city documents, 43% of the city’s land is in residential zones. Without appropriate safeguards, adding density in residential zones in the form of Missing Middle Housing and Transit Oriented Development will result in loss of mature trees, and space to plant canopy trees that provide leaf coverage. Even with careful design standards, a tree and a structure cannot occupy the same space. The SUFP merely calls for “encouraging” developers, and in several places “incentivizing” developers. Without a carrot-and-stick approach, incentives will not save our canopy, and “encouraging” developers is weak tea at best. As Elmhurst is mostly in a Transit Oriented Development Zone, with a new Floor Area Ratio of 2.0, we are concerned about protecting and growing our canopy. In addition, most trees are on private property and the City should encourage property owners to maintain and retain these trees.
- **ENSURE PROTECTION OF TREES FROM DEVELOPMENT.** The current tree protection ordinances in Title 12 are not protecting our canopy from development. It is important that Title 12, as well as Title 17 of the Planning and Development Code contain robust tree protection provisions and measures such as leaving meaningful planting space in project design and requiring front yard trees that shade sidewalks in new development projects. With the state and the city increasingly requiring many types of projects to be approved ministerially, objective design standards that protect and provide planting space for canopy trees are crucial. It is the job of developers to monetize every square foot of the lot. It is up to the city to protect and grow our canopy.
- **CONSIDER TREES CRITICAL INFRASTRUCTURE.** Our urban forest is critical infrastructure and must be put on the same public service level as sanitation, roads, water, police and fire, with transparent budget reporting. The need is critical - as a matter of public health (reducing pollution, heat is the number 1 environmental killer), and climate resilience. This is not reflected in the city’s budget. Both General Plan 2040 and the Climate Action and Adaptation plan rely heavily on urban infill and reducing automobile use. Our tree canopy needs to be on equal footing.
- **THE COUNCIL NEEDS TO ENSURE LARGER TREE CANOPY.** In general, while the Urban Forestry Plan explains the importance of trees, the language is so general that it does protect existing trees or promote a larger tree canopy throughout the City. If the City is serious about promoting a larger tree canopy, it should eliminate “waffle” words such as “encourage,” “promote” and add verbs which result in on the ground actions, e.g. “implement,” “require,” etc.. In addition, the Council must find funding for the Urban Forest Plan and require frequent measurements, e.g. every 3 years, of the City's tree canopy to ensure that tree canopy goals are being met.

Luree Stetson
Trees For Sacramento



June 21, 2024

Rachel Patten
City of Sacramento
Department of Public Works, Office of Climate Action & Sustainability
915 I Street, Suite 2000
Sacramento, CA 95814

Subject: SMUD’S Comments on City of Sacramento’s Draft Urban Forest Plan

The Sacramento Municipal Utility District (SMUD) appreciates the opportunity to provide input and comments on City of Sacramento’s draft Urban Forest Plan (UFP).

SMUD strongly supports the city’s efforts to protect, expand, sustain, and enhance the health of Sacramento’s Urban Forest by providing a policy framework that supports climate resiliency. In July 2020, our Board of Directors declared a climate emergency and adopted a resolution calling for SMUD to take significant and consequential actions to become carbon neutral (net zero carbon) by 2030. In April 2021, SMUD’s Board adopted our 2030 Zero Carbon Plan (SMUD’s Plan). The goal is to reach zero carbon emissions in our power supply by 2030 while maintaining reliability, safety, and affordable rates, doing it all with an eye toward equity for under-resourced communities. Sustainable urban forests complement our goals by helping to cool homes, store carbon and clean the air we breathe.

SMUD is pleased to offer the following initial feedback and recommendations on the “Draft Sacramento Urban Forest Plan.”¹ SMUD looks forward to continuing to work with the City of Sacramento to provide feedback on plan implementation.

Discussion and Input Provided

- 1) SMUD strongly supports the canopy equity strategies in the plan as SMUD’s Sacramento Shade program has similar objectives. Since 1990, SMUD has partnered with the Sacramento Tree Foundation on the Sacramento Shade program which has resulted in more than 600,000 shade trees being planted in the Sacramento region.
- 2) SMUD is pleased to share that SMUD efforts are being leveraged to grow tree canopy in Sacramento which directly support the goals of the UFP. Such efforts include SMUD’s ongoing partnership with the Sacramento Tree Foundation, which was leveraged to help bring in the \$1 million US EPA grant award to the City from the Environmental Justice Government-to-Government program for greening and climate resiliency in Sacramento’s Disadvantaged Communities.

¹City of Sacramento Draft Urban Forest Plan
([Sacramento Urban Forest Plan | Sacramento](#)). April 2024

- 3) SMUD believes that the City partnering with local utility providers such as SMUD, telecom, water, etc. is vital to ensure that necessary utilities can co-exist with trees as the Urban Forest expands. Doing so avoids local utility providers from having to prune or remove trees that interferes with existing lines or poles that need to be placed “inline” with existing pole lines and allows local utility providers to further support future development.
- 4) Considering the region’s ecological history and capacity (grassland and riparian habitat) and the City’s Parks Plan 2040’s inclusion of focusing on natural areas, SMUD believes it would be beneficial to consider adding native shrubs and other perennials to the UFP. While SMUD supports trees and the expansion of the Urban Forest, we believe in right trees in the right place and creating opportunities for grasses and shrubs in places where trees cannot work or exist, for instance with existing SMUD lines or poles. Adding native shrubs and other perennials to the UFP would create an “all vegetation on deck” approach to achieving the vision and goals of the UFP, provide additional support to goals of the City’s Climate Action & Adaptation Plan (CAAP), and potentially reduce operation costs across the board.
- 5) SMUD believes that placing an emphasis on plants native to our region is essential to support biodiversity and pollinator habitat. SMUD has an internal Biodiversity & Habitat Working Group, supplies vouchers for shrubs and other plants to customers when our Vegetation Management program must remove a private tree, and has begun a discussion with the Sacramento Tree Foundation regarding “understory” shrub and perennial plantings. Collaboration between SMUD and the City and the Urban Forest Plan can be an engine to support expanded biodiversity, even with limited land availability. SMUD and City of Sacramento have steadily maintained a relationship to work on an effective vegetation system, and SMUD supports and encourages an opportunity to partner with the City more strategically to leverage our individual programs to focus on identifying key objectives, measures, and actions to help achieve the goals outlined in the UFP and biodiversity expansion.

Conclusion

SMUD appreciates the opportunity to provide input and comments to inform the development of the Urban Forest Plan. We look forward to continuing to work with staff in this proceeding.

Sincerely,



LeAndre Henry
Regional & Local Government Affairs
Sacramento Municipal Utility District
6201 S Street, MS B404
Sacramento, CA 95817



Wild Rye Consulting, LLC

Sarah A. Norris



June 21, 2024

City of Sacramento

Via email: urbanforestplan@cityofsacramento.org

Re: Comments on Draft Sacramento Urban Forestry Plan dated April 2024

Dear City of Sacramento:

Thank you for the opportunity to review and comment on the Draft Sacramento Urban Forestry Plan (SUFPP). The SUFPP emphasizes collaboration between entities, addresses environmental justice issues, and emphasizes community outreach/education and the importance of maintaining existing trees. It is clear that substantial effort has gone into the preparation of this document, and the 2018 Urban Forest Resource Analysis contains important information regarding the existing urban forest population.

The City of Sacramento's Climate Action & Adaptation Plan (CAAP) and SUFPP identify the goal of reaching 35 percent canopy cover for the city by 2045. However, the SUFPP acknowledges that prior to western contact, the Central Valley, including the Sacramento region, was "predominated by dry grassland with native riparian forests that grew along the rivers and savanna-like native oak woodlands at higher elevations" (SUFPP p. 26).

The SUFPP includes a reference to a U.S. Forest Service document that states "40–60 percent urban tree canopy is attainable under ideal conditions in forested states, 20 percent in grassland cities and 15 percent in desert cities are realistic baseline targets, with higher percentages possible through greater investment and prioritization" (p. 33). Given that the Sacramento Area was a grassland/savanna prior to European colonization, is the goal of 35 percent urban tree canopy (UTC) realistic for the City of Sacramento, especially with consideration for the existing built environment, recent periods of drought, and extreme weather events? Prior to planting any tree, it is critical to consider the potential for conflicts with the built environment (e.g., root conflicts with belowground sewer, water, and utilities; root and trunk conflicts with paved surfaces, and building foundations; canopy conflicts with overhead infrastructure such as utility lines, building, etc.) as well as tree characteristics (fruit production, failure profiles, etc.). The urban forest is an investment. Too often, trees are planted in locations that do not consider the size of the tree at full maturity, and the result is often tree removal.

As an ISA-certified arborist and a resident of Sacramento County who regularly works, enjoys recreation in the city's beautiful parks, and otherwise enjoys the City of Sacramento's amenities, I am grateful for the early efforts to convert the "City of Plains" to the "City of Trees." The tree canopy that portions of the City have is remarkable. I have concerns, however, that the goal of 35 percent tree canopy exceeds what may be possible given the climate and environmental conditions, urban constraints, and the future funding required to plant and maintain an additional 540,000 trees or 25,000 trees per year until 2045 – in addition to the cost of maintaining the current urban forest of an estimated 1 million trees. If the

City's total investment to care for approximately 100,000 trees (i.e., 10 percent of the urban forest) was \$7,700,000 for FY 2022/2023, what is the projected cost to care for the urban forest of the future? Is this realistic given current budget shortfalls? The SUFP recommends planting more than 50 percent more trees in the City limits. This requires tremendous financial resources, stewardship, physical space, and professional knowledge. Trees are part of the City's critical infrastructure, but are the critical infrastructure and financial resources in place to support the exponential expansion of the City's urban forest? It is best to care for the existing urban forest and add tree resources in the parts of the City that currently has limited tree resources at a pace that the newly planted trees can be properly cared for. New tree-planting efforts need to be focused in disadvantaged communities that lack access to UTC.

The SUFP acknowledges that to reach the goal of 35 percent UTC, many changes are required, including policy and enforcement changes. Incentive programs may be required, and ordinance violation fines and fees would need to be issued and enforced. Tree monitoring would need to be prioritized to inventory changes in UTC. Funding sources are not identified for the ambitious goals of the SUFP. Increasing fees associated with the Landscaping and Lighting District assessment may disproportionately affect disadvantaged communities, the same neighborhoods and census tracts that are prioritized in the SUFP for increasing UTC. Outside vendors that manage for-profit recreation on City-owned land may be alternative revenue sources for accruing funding to help achieve the goals of the SUFP.

Planting trees cannot be the only proposed solution to achieving carbon neutrality, yet this is the only solution proposed under carbon sequestration in the CAAP. Perennial native grasses are capable of sequestering carbon¹ and this should be considered as part of the solution to achieve carbon neutrality, although the use of perennial native grasses was not evaluated in the CAAP. Although perennial native grasses do not provide the same shade benefits as trees, nor do these lifeforms offer the same aesthetics, the potential conflicts with the built environment are also substantially less. Native perennial grasses are an important part of the ecology of the region and support different invertebrates in the food web. Grasslands are also important to bird species. The tree canopy summary on page 32 of the SUFP identifies approximately 17 percent grass/low vegetation land cover. It is important to consider the biological resources of these areas and the wildlife that they support—it may not be appropriate to convert grassland land cover to woodland or forest.

The draft SUFP identifies many strategies and implementation actions to achieve the goals of the SUFP, but funding sources and program specifics are lacking and language is vague. This will make measuring success and goal implementation difficult without established timelines and clear metrics of success identified. It is important to engage stewardship at all levels in the community and recognize that trees have the potential to live for decades if properly selected, planted, established, and maintained. Tree selection and development of a master tree list to update the City's 2015 version must reflect climate change potential and consider the lifespan of a tree². Because species grow at different rates, the maintenance and lifecycle management cycles should reflect tree growth of the trees on the new master species list. Proper tree selection based on surrounding infrastructure/built environment and early structural pruning must be prioritized.

¹ Dass, P., B. Houlton, Y. Wang, and D. Warlind. 2018. Grasslands may be more reliable carbon sinks than forests in California. *Environmental Research Letters*. 13: 074027. Available: <https://iopscience.iop.org/article/10.1088/1748-9326/aacb39/pdf>.

² Koeser, A.K., R.J. Haur, J. Miesbaur. 2021. (October). Boldly Planting for the next generation. *Arborist News*. 30:12-17. International Society of Arboriculture.

The SUFP identifies the 10-20-30 rule to achieve species diversity. However, there are few publicly available free scientific papers³ readily available on the internet to evaluate the suitability of this guiding principle. Having a diverse urban forest is important to prevent catastrophic losses of trees from existing and emerging diseases and pests, as well as building climate resilience. However, any species selected for the master species list should be capable of surviving in the urban environment. At least one study from the Wisconsin Department of Natural Resources suggests that the 10-20-30 rule is insufficient to protect against the threat of emerald ash borer⁴.

The list of Partner Advisor Committee (PAC) members does not appear to include any members of the tree care industry, International Society of Arboriculture (ISA) certified arborists, nor American Society of Consulting Arborists (ASCA) members or registered consulting arborists (RCAs). Consulting arborists can assist the City as we are professionals who often work in areas of education, outreach, tree inventory, and other aspects of urban forestry depending on specialty and training. As a small business owner in unincorporated Sacramento County, Wild Rye Consulting is a vendor to the City of Sacramento and Sacramento Municipal Utility District (SMUD) through the SEED vendor program. I strongly recommend that consulting arborists be engaged to help the City achieve the goals and objectives of the SUFP.

I respectfully request that this comment letter be considered as part of the public record. Wild Rye Consulting offers comments on the strategies, policies, and implementation actions of the SUFP below.

Thank you,



Sarah A. Norris
Owner | Sr. Scientist
ISA Certified Arborist WE-7726A
ISA TRAQ
American Society of Consulting Arborists, Member

³ Kendal, D. , C. Dobbs, V. Lohr. Global Patterns of Diversity in the Urban Forest: Is there Evidence to Support the 10/20/30 Rule? Urban Forest & Urban Greening. 13: 411-417. Available:
<https://www.sciencedirect.com/science/article/abs/pii/S1618866714000387#:~:text=A%20commonly%20used%20rule%20of,30%25%20of%20any%20single%20family.>

⁴ Wisconsin Department of Natural Resources. Replanting with Diversity: An Essential Ingredient to a Successful and Resilient Urban Forest. Available:
https://dnr.wisconsin.gov/sites/default/files/topic/UrbanForests/EABToolbox_Diversity.pdf

Page	Strategy	Policy + Implementation action	Comment
96	1.1 Expand Canopy: Increase the current levels of canopy to maximize the benefits of the urban forest.	1.1.1 The City shall strive to achieve a minimum average City-wide tree canopy of 35 percent by 2045.	Funding sources to achieve this goal are unclear. The SUFP should include a discussion on the projected cost to care for the urban forest increasing UTC to 35 percent from 19 percent.
97	1.2 Plan for Trees: Incorporate trees into all levels of planning and development to ensure existing trees are preserved, an adequate number of new trees are planted to reach canopy goals, and that trees can grow to maturity without interfering with adjacent infrastructure.	1.2.7 Ensure the establishment of trees incorporated into development.	<p>This implementation statement should contain stronger language. Planting day is the most important day in the life a tree. If planted incorrectly (e.g., too deep/root flare buried, narrow planting site prepared, backfilled with unsuitable material, etc.) the future trajectory of a tree can be significantly altered. Once planted, aftercare must occur. Trees should be mulched, watered, and stabilized. Too often, however, trees are left staked for longer than needed and this can lead to girdling and trunk damage.</p> <p>The water requirements of trees is also variable between species. It is important to ensure that trees are provided the appropriate amounts of water when supplemental irrigation is provided. The Water Use Classification of Landscape Species (WUCOLS) information (see UC Davis, California Center for Urban Horticulture) should be included in the master species list. It is important to note that trees such as valley oak (<i>Quercus lobata</i>) are often watered directly under the dripline (and often may have their trunks sprayed directly by irrigation systems. This often leads to an increased risk of fungal decay, disease., and reduced lifespans.</p> <p>Recommend that the City make it mandatory that developers incorporate arborists and tree care professionals into the planning and construction phases of development projects and require annual</p>

			reports from developers prepared by qualified, credentialed arborists on the establishment of trees to document tree health, structure, and condition and ensure that proper aftercare is completed to establish trees as part of the urban forest.
97	1.3 Canopy Equity: Seek to address historic inequities, remove barriers to tree adoption, and ensure the urban forest is shared equitably across all communities.	1.3.2 Support and facilitate canopy expansion efforts on private property across the City with focus in priority communities.	Recommend that the City develop a list of trees suitable for planting on private property as well as what <u>not</u> to plant. The species distribution of UTC of private trees is unknown as the 2018 Urban Forest Resource Analysis focused on the trees on City-managed land. However, trees such as tree of heaven (<i>Ailanthus altissima</i>), Chinese tallow (<i>Triadica sebifera</i>), black locust (<i>Robinia pseudoacacia</i>), and privet (<i>Ligustrum</i> spp.) are fairly common in the residential landscape and these trees readily disperse and establish unaided and are invasive in riparian areas. Some non-native trees may also require additional water. Dr. Alex Shigo ⁵ stated, “We are now living in a world where exotics are wanted more than natives. As we bring in trees from other areas, we have to realize that we must bring their environments along with them. If you bring a tree from a wet area into a dry area, you must water it. If you bring a tree from a dry area into a wet area, you are going to have problems.”
98	2.1 Canopy Resilience: Ensure Sacramento’s urban forest is resilient and prepared for the biotic and abiotic impacts of climate change necessary for the longevity and success of the city’s trees.	2.1.1 Promote biological diversity in tree species and age for the city’s urban forest to maintain resilience.	An important component of biological diversity is incorporating suitable native species. At present, valley oak (<i>Quercus lobata</i>) represents 4.23 percent of the UTC. Incorporating native species from other floristic providences of the state may also be appropriate. It is important to note that the City’s most prevalent tree, London plane (<i>Platanus x acerifolia</i>) is not listed on the City’s master tree list dated 2015.
		2.1.2 Create a master recommended tree list to	The master list should be based on the best available science and incorporate

⁵ Miller, R.H. 2024. *Tree Leaves* Interview with Dr. Alex Shigo. Arborist News. International Society of Arboriculture. 33:37–39.

		ensure all trees planted by the City or associated with approved development projects are suitable for changing climate conditions in Sacramento.	climate-ready tree species. Extensive research and trials have been completed at UC Davis (Texas Tree Trials ⁶) and The Britton Fund (Climate Ready Trees for Northern California ²⁷). The trees evaluated in these studies should be further evaluated for their use in the urban forest. Any tree included on the new master list for Sacramento should consider characteristics of the tree, including rooting behavior, potential to be invasive/escape cultivation, and failure profile.
99	2.3 Tree Protection: Preserve existing tree canopy and healthy mature trees as vital for maintaining current canopy levels, meeting canopy goals, and adapting to climate change. Enforce tree protection standards to better protect the urban forest from loss of existing trees.	2.3.1 Preserve mature trees in development to the extent feasible. and 2.3.2 Protect existing trees during construction.	Strongly recommend that development plans be mandated to include best management practices for tree protection during construction. Tree protection zones (TPZ) should be established and clearly marked on plan sets to prevent damage during construction. TPZ should encompass the critical root zone and be established with consideration of the species' relative tolerance ⁸ of disturbance and the age of the tree. Older trees are less tolerant of construction disturbance and, therefore, require a larger TPZ.
		2.3.6 Support the use of proper pruning techniques on privately maintained trees.	Currently, pruning of privately protected trees is under the City's jurisdiction only if the tree meets the definition of a protected tree as provided in the definitions of 12.56.020 and regulated work is to be performed. Pruning should always be performed or overseen by an arborist or tree care professional who performs pruning in accordance with ANSI A300. It is unclear how the City intends to achieve this policy or what the implementation strategy is. Will this be

⁶ UC Davis. Texas Tree Trials Database. UC Davis Arboretum and Public Garden. Available: <https://arboretum.ucdavis.edu/tree-database>.

⁷ The Britton Fund. Climate-Ready Trees for Northern California Communities–A 20-Year Evaluation. Available: https://www.treedavis.org/wp-content/uploads/2021/10/CRT_NorCal_Handout_2016_12_14.pdf.

⁸ Matheny, N. and J.R. Clark. 1998. *Trees and Development: A Technical Guide to Preservation of Trees During Land Development*. International Society of Arboriculture. Champaign, IL.

			<p>through education and outreach? Holding pruning clinics? Prohibiting unqualified landscaping crews from performing this work? Enforced with fines?</p> <p>It is always best to perform structural pruning early in the life of a tree. Pruning mature trees, especially large branches, results in large wounds on trees that are susceptible to decay fungi and bacteria.</p>
100	3.1 Organizational Best Practices: Seek to include necessary resources to manage City trees at a sustainable level.	3.1.1 Employ professional urban forest staff and rely on urban forestry best management practices.	City staff should be credentialed professionals from ISA, ASCA, and/or TCIA. Continuing education is a critical aspect of ensuring that best management practices are followed as the best available science is evolving in arboriculture and the tree care industry.
		3.1.3 Strengthen collaboration and support between all City departments that manage trees.	<p>This is critical to the success of the SUFP and achieving the stated canopy goals. All departments must recognize that proper tree care is imperative to the health of trees and achieving the canopy goals.</p> <p>Strongly recommend education for maintenance crews that work to maintain turf and irrigation in City parks. Often young trees are damaged by mowing and string trimming and this creates damage to the lower tree trunk and roots, making the tree susceptible to decay fungi and bacterial infection.</p> <p>Maintaining trees to current arboriculture tree care industry standards will result in longer lifespans and increased benefits of the UTC.</p>
		3.1.4 Conduct annual reporting on the urban forest plan to ensure progress towards goals and appropriate resource allocation.	This is critical. Recommend adding a date that this report will be available each year. This report should be publicly available and posted on the Urban Forestry webpage.
		3.1.5 Strive to perform regular 5-year updates to the Urban Forest Plan and canopy cover	<p>Recommend strengthening the language in this policy and commit to completing 5-year updates rather than “Striving.”</p> <p>This implies that this item could be cut</p>

		assessment and analysis reports.	from future budgets, but the information contained in 5-year reports is critical to analyzing the success of the program and where there are areas that require improvement.
100	3.2 Manage Risk: Utilize tree risk management policies, procedures, and practices to minimize risk of injury and property damage.	3.2.2 Maintain and implement emergency response plans for storm events that result in tree loss and damage.	Recommend collecting tree failure information to inform long-term management of trees and managing the life cycle of the urban forest. Information such as tree species, diameter standard height (DSH), approximate tree height, and how the tree failed can give tremendous insight into what trees and what age classes of trees are failing. This information can be used to build resiliency in the urban forest. Recommend that post-storm reporting be publicly available. Recommend that Tree Risk Assessment (ISA protocol) be conducted in areas of critical infrastructure following intense storms.
		3.2.3 Minimize future damage or conflict by planning for trees as a part of infrastructure.	This is critical. Understanding the rooting characteristics of trees is important to minimize conflicts with the built environment.
101	3.3 Regular Maintenance: Perform regular maintenance on City trees to improve the health, longevity, safety, and functional capacity of the urban forest.	3.3.2 Update and regularly maintain a comprehensive inventory of all City-managed trees.	Recommend this implementation action include a stated timeframe. Will this be every 5 years? Will every new tree planted be included in the inventory at the time of planting? Identify the methods by which a comprehensive inventory will be maintained. Consider that this should be publicly available information. Recommend that the City investigate the Arc GIS Story Map of Austin, Texas ⁹

⁹ City of Austin. N.d. Tree Canopy: A Guide to Understanding Tree Canopy in Austin, Texas. Development Services Department, Community Tree Preservation Division. Available: <https://storymaps.arcgis.com/stories/d9ba0b99c60b4b8395414a09c4533949>.

102	4.1 Community Engagement: Support community advocacy for and involvement in the urban forest.	4.1.1 Recognize and promote the city's urban forest.	The draft SUFP does not have a land and equity acknowledgment although the Sacramento Parks Plan 2024 does. Recommend incorporating culturally significant trees into the master tree plan, as appropriate. It is important to recognize the City's ethnic and cultural diversity in determining how to effectively implement this action/policy.
		4.1.2 Conduct a City-wide urban forest public outreach and education.	This is critical to the success of the SUFP. Education and outreach programs need to be expanded. This is critical information for private, commercial, and industrial land owners. Education and outreach programs need to reach all members of the community to cultivate stewardship and successful implementation of the SUFP. This requires also expanding urban forest and tree education and outreach programs in the City schools.
102	4.2 Partner Coordination: Facilitate coordination, involvement, and commitment from all entities that own, control, regulate, or affect the urban forest.	4.2.3 Strengthen partnerships with entities in disadvantaged and low tree canopy neighborhoods.	It is important that the City master tree list include trees that are representative of the City's ethnic diversity. The SUFP should also acknowledge the historic ethnic neighborhoods, such as the City's historic Japantown.
102	4.3 Youth Engagement: Cultivate youth engagement in the urban forest to continue Sacramento's legacy of tree stewardship.	4.3.2 Increase youth tree literacy and access to trees.	This requires implementation action needs to include expanding urban forest and tree education and outreach programs in the City schools and youth programs.
103	4.4 Workforce Development: Advance career pathways in urban forestry.	4.4.1 Promote workforce development programs for tree care professions as a critical component of green industry.	Recommend that the City and arboriculture/tree care industry partners explore the development of an arborist apprenticeship program.

104	5.1 Program Funding: Pursue sustainable funding to support the ambitious canopy and program goals within this Plan.	5.1.1 Perform a cost analysis to determine the projected cost to meet the tree planting and maintenance targets identified in the Urban Forest Plan to reach 35 percent canopy cover by 2045.	Cost analysis should be completed prior to the adoption of the SUFP and CAAP and UTC goals revised as needed to prevent greenwasting. There is evidence that a minimum of 30 percent canopy ¹⁰ is required to realize significant benefits. It is important to grow the urban forest at a scale that can adequately be managed—this requires dedicated funding.
		5.1.2 Pursue an increase in dedicated long-term funding to provide an increased level of tree canopy, perform associated care and maintenance, and expand core urban forestry services and programs.	Funding sources should be identified prior to implementing the SUFP. Although there is a budget to care for the existing urban forest, it is unclear what percentage of the 540,000 trees that are to be planted as part of the SUFP would be on City-owned property.
		5.1.4 Optimize existing funding sources to meet canopy and management goals.	Processes for optimizing canopy and management goals should be identified prior to program expansion. Otherwise, the existing urban forest may suffer from lack of care due to limited funds and rapid expansion. Care and management of the existing urban forest is critical to maintaining an age-diverse population of trees.
104	5.2 Incentive Programs: Identify incentive programs to reduce barriers to tree	5.2.1 Explore providing financial support to residents in disadvantaged	Funding and education and outreach programs will be needed. Disadvantaged communities may have attitudes and beliefs ¹¹ about the advantages and disadvantages of trees and urban tree care programs and proper tree care ⁴¹² .

¹⁰ Konijnendijk, Cecil. 2022. Evidence-based Guidelines for Greener, Healthier, More Resilient Neighbourhoods: Introducing the 3-30-300 Rule. Journal of Forest Research. 34: 821-830. Available: <https://link.springer.com/article/10.1007/s11676-022-01523-z>.

¹¹ Martin, A.; Gordon, J.; Schelhas, J.; Mattox, T.S. 2024. Perceptions of Tree Risks and Benefits in a Historically African American Neighborhood. Sustainability. 16: 3913.

¹² Zhang, Y., A. Hussain. J. Deng, and N. Leson. 2017. Public Attitudes Toward Urban Trees and Supporting Urban Tree Program. Environment and Behavior 39: 797-814. Available: https://www.researchgate.net/publication/238428874_Public_Attitudes_Toward_Urban_Trees_and_Supporting_Urban_Tree_Programs.

	planting and care on private property.	communities for tree planting and care.	Community education and outreach are paramount to ensuring that the urban forest receives appropriate tree care and stewardship. With 90 percent of the existing trees located on private property, education and outreach need to be a priority for successful implementation of the SUFP and achieving the 35 percent UTC goal.
		5.2.2 Explore financial incentives to support residents with mature trees.	<p>Funding and education and outreach programs will be needed. Mature trees would presumably fall under the jurisdiction of 12.56 and require a tree permit from the City. Tree permits should stipulate that regulated activities such as pruning be performed by professionals in the tree care industry and in accordance with industry ANSI A300 pruning standards.</p> <p>The current Tree Ordinance (2016-0026, Chapter 12.56) does not have a definition for “mature tree” nor “heritage tree.” Recommend that these terms be clearly defined in the development of any program established to facilitate implementation of the SUFP and incorporated into future revisions of the ordinance.</p> <p>Mature trees are generally defined as “close to their mature full height and crown size” according to A – Z of tree terms: A Companion to British Arboriculture. If the City were to adopt a definition similar to this, it may necessitate including measurements of tree height and longest limb/dripline radius measurements in the City’s tree permit application process.</p>

Rachel Patten

From: ann ralph [REDACTED]
Sent: Wednesday, July 24, 2024 9:48 AM
To: Climate
Subject: County pockets

Hi. I live on a treeless street in a county pocket in South Oak Park. The county lacks a street tree program. Are neighborhoods like mine included in this funding? Here's the temperature in my front yard on July 2 at 3 pm.

Thanks.

Ann Ralph
[REDACTED]



Rachel Patten

From: Jennifer Donlon Wyant
Sent: Monday, August 26, 2024 12:57 PM
To: Rachel Patten
Cc: Casandra N Cortez
Subject: Urban Forest Plan: Shared Use Paths

Hey Rachel,

Thanks so much for connecting us with Jeff and Ron from the MUT team. They brought up a great question – if the Urban Forest Plan has a goal for 50% canopy on streets and sidewalks, can we expand that to include Streets, shared use paths and sidewalks?

I agree our shared use paths could benefit from greater canopy. Thoughts?

Thank you,
~JDW

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