

Community Forest Advisory Board City of San Diego



August 1, 2022

Mayor Todd Gloria

Council President Elo-Revera

Councilmembers LaCava, Campbell, Whitburn, Montgomery, von
Wilpert, Cate, Campillo, and Moreno

SUBJECT: *Comments on Draft Revised Climate Action Plan*

This letter offers recommendations from the Chair of the Community Forest Advisory Board (CFAB) on the draft proposed Climate Action Plan (CAP), released in June 2022 and scheduled for approval at the City Council meeting on August 2, 2022.

1. Why do trees matter in the CAP?

Many reasons! Trees offer shade that invites walking to transit lines, bicycling, and nearby parks and thus contribute to reducing vehicle trips and greenhouse gas emissions. Trees are now universally identified for carbon sequestration, urban cooling and reduction in energy use and costs, public health, sense of community, and restoration of ecosystem processes. Trees are a reminder that both individual and collection action can be taken for climate change, giving a sense of “agency” rather than helplessness.

In the survey for Climate Resilient SD, 93% of participants wanted more trees and green spaces in their neighborhood. The City needs to listen, respond to, and try to meet the public’s desires for trees, shading and other benefits by strengthening and implementing this Climate Action Plan.

2. Goals and Strategies

Accomplishments toward current CAP cover goals. The City has not reported or reviewed the accomplishments in reaching tree canopy goals set in the 2015 CAP. The target was 20% canopy cover by 2020, and since the observed tree canopy cover was 12.9% in 2014 in the Urban Tree Canopy Assessment, and it’s safe to say that the goal has not been achieved.

Revised target goals. The target goals of 28% and 35% need to be reconsidered, simply because they are unachievable in our Mediterranean climate. A reality-check of these proposed goals will transform these into number of trees beyond the trees in the existing 13% tree canopy cover, including the number of existing trees that would have to be protected, the tree losses, and the number of planted trees that provide substantial shade in 15 or 20 years. An ambitious but meaningful target could be 20%, which is recommended by American Forests for cities with “grassland” climates, that are similar to San Diego’s.

Goals need to be aspirational but achievable. If a goal is set too high, there will be continuing failure, discouragement, and lack of appreciation for accomplishments. Councilmembers, community leaders, local professionals, businesses and residents can be invited to work toward achievable targets and collectively celebrate increased tree canopy and benefits.

Strategies to achieve target goals. The list of Actions and Supporting Actions are impressive and, if funded and implemented, would result in a first-class municipal urban forestry program. There are some high targets (100,000 trees), essential but expensive site preparations (irrigation, concrete removal, quality tree planting). A quick estimate is a staff of 25 plus contracts, maybe \$25 million/year (now about \$5 million for street trees, including contracts, professionals and tree care workers, now about \$2 million for parks).

The tasks, resources, and places to plant 100,000 trees by 2035 need to be calculated. Finding planting spaces is already a challenge, with the “free tree” program, so a city-wide community-based campaign will need to be launched to motivate private and public tree planting and care. Various strategies can be identified and compared, using parcel-level tree canopy data and land uses. For example, directing code enforcement to restore parking lot trees, installing irrigation so trees can be planted along boulevards or near transit routes, incentivizing private property owners, waiving fees for concrete cutting for private trees, and giving a residential water bill credit for watering street trees for the first three (or ten) years.

Other groups are also focusing on lack of implementation since 2015 plan, and have expressed concerns about passing the CAP far ahead of issuing an implementation plan. The CAP should not be approved without a pathway and commitment to achieve the goals through City policies, enforcement, staffing, funding, and other resources. To do otherwise would not be truthful and set up false expectations that lead to disappointment and disillusion with elected officials and City staff.

3. Actions

Active and public transit. Reducing vehicle miles traveled is a prominent goal in the CAP, and trees and urban nature can facilitate alternatives to driving and thus reduce vehicle trips and emissions. Additional priority can be given to tree-shaded streets that invite walking to transit lines and shopping, and both walking and bicycling for active leisure. The action to support additional urban green space along freeways and city right of way could transform neighborhoods.

Protection of existing trees. The highest priority should be to maintain and protect existing trees, as they provide more shade, cooling, habitat, carbon sequestration and other benefits than newly-planted small trees. Extra attention should be given to heritage trees and trees in parks, as they provide valuable shade, beauty, and places to socialize and recreate. The draft CAP has vague and weak actions referring to tree protection and maintenance, and they would not drive implementation and funding to achieve canopy goals. The actions need to be strengthened for tree monitoring, pruning, pest management, and heritage tree care.

Tree planting success and longevity. Siting, planting, and maintaining young trees are deceptively complicated and shortcuts result in death of planted trees within a few years. Trees need sufficient above-ground space, soil capacity and condition, quality nursery stock, proper planting, watering young tree care, and more. If not provided, trees have a high likelihood of dying within a few years, planted again and susceptible to the “death spiral” again.

The draft CAP has many actions referring to tree planting that collectively provide direction to increase tree planting success—but now need the City’s commitment to invest in and implement them. Even as funds have increased for the “free street tree” program, there are insufficient staff to proactively manage community engagement, education, and evaluation of tree planting.

4. Alignment of City policies

Development regulations. Even with the 2015 CAP commitment to tree canopy, some City policies and decisions have undermined that commitment. The accommodations consistency regulations in the land use regulations are unjustified in the staff report, unreviewed by landscape architects and urban foresters, contrary to professional practices, and will accelerate neighborhood tree loss.

The onsite and street tree requirements would favor trees and strengthen the CAP. But \$725 is actually a shockingly cheap cost for developers to avoid protecting or planting a tree, and a high cost to each neighborhood that loses large trees, shade, and neighborhood character. The \$725 fee is represented as a revenue, offsetting costs of planting trees that are committed in this CAP, but not resulting in net tree canopy increase. If trees are required without accommodation, the tree protection and planting will become design elements that architects and developers must (and will) follow.

When infill policies and permits allow most or all trees to be removed on lots with established landscaping and required setbacks are so narrow that they leave little or no room for trees on the property, this will lead to widespread elimination of neighborhood tree canopy and nature. Whereas more dense, affordable, and smaller unit housing is clearly needed in San Diego, it doesn't have to be an "either or" choice. Development permits can be expected to provide for irrigated parkways, street tree planting, and set aside of "front yards" as semi-public greenspace that neighbors can enjoy.

Enforcement of existing policies. Some of the actions refer to enforcement, but that needs to be a primary strategy in order to retain existing trees that constitute the current tree canopy. Development permits require trees to be planted and maintained in perpetuity, and many have been illegally topped, underwatered, or removed. The City needs to inspect, issue compliance notices and fines, require trees to be replaced and maintained, and provide trees and shade in the de facto public spaces that are commercial parking lots and other properties. When illegal tree removal and maintenance practices are not reported and penalties not considered, imposed, or collected, then property owners and managers assume that they can violate City code without detection or enforcement. This results in tree canopy loss, declining tree health and safety, and City exposure to liabilities and lawsuits.

5. Implementation and monitoring

Implementation. The Five-year Urban Forest Management Plan was adopted in 2017. An assessment is timely but for many measures, there is limited information, and others are not encouraging. FY 2020, the City removed about 1,600 trees and planted about 1,600 street and park trees, a clear loss since mature trees provide far more canopy. Five years later, the staff increased from one to six professionals, but that staffing level does not provide for strategic, integrated, effective urban forest management. There are insufficient staff to respond to the 7,000 tree reports and requests submitted annually in the "Get it done" app, thus disproportionate attention is given to reactive rather than proactive urban forest management.

Monitoring. Monitoring is critical to successful urban forestry. These were outlined in a draft Five-year plan version from late 2015,¹ but not included in the plan that was presented to the Council for approval in 2017. The monitoring actions included spot-checking tree nursery stock, inspecting

¹https://www.sandiego.gov/sites/default/files/december_9_2015_attachment_urban_forest_management_plan.pdf

young trees after planting, evaluating conditions of tree failures and limb drops, tracking tree-related conflicts with infrastructure, and surveying participants in public education and other programs. Street tree inventories have been assembled with tree care and tree inventory contracts over the past decade, and these can be centralized onto one inventory platform such as TreePlotter for more timely and useful monitoring.

6. Equity and public service

The priorities for action in Communities of Concern are well placed. All San Diegans deserve healthy neighborhoods, yet decades of inequitable public investments (locally and nationally) have perpetuated such environmental injustice as few trees and parks, more pavement, and hotter temperatures. Both community groups and City staff lack resources to identify suitable planting sites, install irrigation, prepare grant proposals, administer grants, and otherwise benefit from the available State and Federal funding.

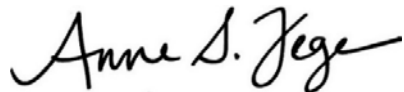
City residents overwhelmingly asked for urban nature, trees, parks and community gardens. Now the City needs to take actions to align with those expectations—or reduce those expectations. The CAP should not promise actions that the City does not intend to implement.

8. Closing

Municipal, community and individual investments in trees and urban nature are real, visible, and a source of pride and hope. Trees cool neighborhoods and buildings, facilitate transit and active transportation, contribute to public health, build community, restore ecosystem processes, provide wildlife habitat, and build confidence in individual and community climate action.

The Climate Action Plan can set realistic expectations and strategies for tree canopy cover and the attendant benefits for climate action, with a few revisions. Please feel free to contact me for further information about any of these recommendations and supporting information.

Sincerely,



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