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The Urban Forestry Commission (UFC) strongly supports an updated Urban Forest Protections Ordinance. The UFC believes that an updated ordinance is critical to achieving many of our urban forest protections goals including:

1. Maintaining and growing the urban forest – specifically in neighborhoods are areas traditionally underserved by ecosystem services.
2. Protecting large, healthy trees from being cut down.
3. Minimizing the removal of any tree > 6” DSH which are the large, health trees of the future.
4. Maximize tree replacement planting to offset tree losses.

The UFC also recognizes that there are potential conflicts between implementing tree protections and achieving other critical goals for the city including increasing the total available housing stock and in particular amount of affordable housing. Addressing the housing crisis through increasing housing stock is an important racial and social justice issue as well as a critical component of addressing the city’s homeless crisis. Finally, increasing the density of housing in urban environments has numerous benefits including reducing housing pressure in suburban and exurban areas where forests are also at risk and reducing commute times, which reduces greenhouse gas emissions from transportation.

The UFC believes that we can achieve both goals with careful policy design. With those two goals in mind, we have reviewed the proposed ordinance from SDCI and have the following recommendations:

Tree replacement requirements

When trees cannot be protected during development, tree replacement is the best option for investing in our future forest canopy. The costs of planting and maintaining a replacement tree through its establishment period are minimal relative to development costs. In addition, replacement trees offer an opportunity to ensure that newly planted trees are planted at an appropriate site where the tree can be protected from future development. Because of the relatively low cost to developers of tree replacement, the UFC strongly recommends that SDCI increase replacement requirements.

The UFC believes that current tree replacement requirements in the SDCI draft ordinance are inadequate.

The UFC requests:

- All trees 6" DSH or greater are included on site plans and replacement is required for any such trees removed in the development process.
- Higher replacement ratios for larger trees if/when they must be removed during development.
- A robust payment-in-lieu program that adequately prices trees based on their ecosystem values lost.
- SDCI consider requiring replacement for removal of hazard trees.

Tree removal allowances

The UFC strongly supports lowering the threshold for an exceptional tree to 24" DSH. This is a significant improvement in protection.

The UFC would like to see improvements in the development process so that protection of large trees is considered at the outset of development as opposed to during the review phase when considerable resources have been spent developing a site plan. Developing a process for developers to consult with SDCI at the project development site prior to drafting plans could result in improved outcome for trees without causing costly development delays.

Some approaches could be:

- Properly pricing removal of large trees to reflect the ecosystem services they provide the city.
- Creating incentive programs for property owners to retain large trees.
- Creating incentive programs for developers who retain large trees during the development process. For example, lowering parking requirements, increasing height limits, or other potential benefits.

Outside of development, the UFC strongly recommends lowering the number of trees property owners can remove from 3 per year to 2 every 3 years. Because this requirement occurs outside of the development process it would protect trees without having an adverse effect on development of new housing.

Exemptions from the Ordinance

There are or may be requests to exempt projects from the ordinance requirements. One potential exemption would be in for the development of affordable housing. The UFC does not want urban forest protection policies to hinder development of affordable housing. However, we would also like to note that affordable housing residents also deserve the benefits provided by urban trees. As a result, we do not recommend exempting affordable housing development from requirements that ensure trees and greenspace are protected and included in the housing design.

Other requests and priorities

Tree removal and replacement tracking data are needed to inform effective policy. As a result, **requiring permits for tree removal** would provide valuable information that will help inform future urban forest policy and increase public transparency in tree removal and management.

We also recommend using the root zone to measure total area needed for tree protection as opposed to the drip line (https://nature.berkeley.edu/garbelottowp/?ga_fags=what-is-the-critical-root-zone)