



December 31, 2010

Cindy Blain, Operations Director  
Sacramento Tree Foundation  
191 Lathrop Way, Suite D  
Sacramento, CA 95815

RE: Draft Model Urban Forest Ordinance

Dear Cindy:

Thank you for providing *WALKS*acramento with the opportunity to comment on the draft Model Urban Forest Ordinance. We also appreciate that you took the time to speak at our monthly membership meeting last January. I've organized our comments in order of the numbered sections of the draft.

#### **100.10.030 – Canopy Cover Goal**

- **Parking Lots**

Parking lot coverage should include more than just percentage of the paved surface area. Parking spaces that are shaded will have paved surface shaded and the vehicles parked in the spaces will also be shaded. This provides the benefit of not only reducing the heat island effect due to the parking lot, but reducing the hot soak emissions and interior temperatures of the parked vehicles. Therefore, a requirement to shade a percentage of the total parking space area should be added to the parking lot requirement. 50% paved surface area shading and 75% parking space area shading seems reasonable. Pedestrian walkways should also be required to have a minimum percentage shaded area.

We suggest that the Tree Foundation work with shopping center owners to provide incentives to provide greater shade coverage, particularly of sidewalks and pathways. There might be a way of providing LEED type credit for good practices. Perhaps parking space requirements might be reduced with commitment to significant shade coverage.

- **Single Family Home Development and Streets**

It may be difficult to get even 35% lot coverage with trees on many smaller lots, especially where the streets have attached sidewalks. It is not uncommon for lots under 5000 square feet to have close to 40% lot coverage by the building. After including the driveway, rear yard patio, front porch, and narrow side yards, there is little room for trees, especially trees large enough to be considered shade trees. It may be that the requirements of single family homes and street work in concert to be achievable.

Large canopy shade trees in higher density neighborhoods are less likely to thrive because planters are often smaller than recommended. The ordinance could require use of engineered soil in areas where planters are small and/or soil is compacted.

- **Schools**

School parking lots should have the same 50% requirement as private development parking lots. The goals are the same – reducing storm water runoff, heat island effect, and hot soak emissions.

Trees near the edges of hard-surface playgrounds can shade the area when the sun is not directly overhead. Planting of trees along street frontages should be encouraged so that sidewalks are shaded.

### **100.10.060 – Tree Care Responsibility**

The practice of “topping” should be prohibited and violations subject to fines and replacement. Severe violations should be subject to fines equivalent to cost per inch factor or by using the current Guide published by the Council of Tree and Landscape Appraisers as in 100.10.110 – Tree Removal Mitigation.

### **100.10.080 – Street Trees**

There are situations where trees are not within the public right-of-way, yet they should be considered to be street trees because they will shade the street. Trees that are within a PUE but not within the ROW should be covered by the ordinance. Trees not within the PUE and ROW but that act as street trees should be protected by some means; if not by ordinance, then by PUD guidelines?

Medians and roundabouts should be planted with trees. Medians with canopy trees on local streets can offset the impact attached sidewalks have on street shading.

- **Sidewalks and Bike lanes**

The current draft is considering recommending 50-70% tree canopy coverage for the overall street but doesn't mention sidewalks. We'd like to see sidewalks and bike lanes shaded to encourage both walking and bicycling, and we suggest that the model ordinance sets a percentage for sidewalks and bike lanes that should be shaded. There should be two values for bike lanes – one for streets with planter strips between the curb and sidewalk, and a lower value for streets with attached sidewalks. The sidewalk shading percentage shouldn't be affected by whether the sidewalk is attached or detached.

- **Safe Routes to School**

We were excited to learn that the Tree Foundation is working with school districts to plant trees on school property (Twin Rivers is planting 1,000 trees and San Juan School District will be planting 1,500 trees in the next 5 years). We urge that the Tree Foundation and school districts plant trees along the edges of the school and along sidewalks and pathways children take to get to school.

The Tree Foundation has an extensive program with SMUD to encourage homeowners to plant trees to shade their homes. We suggest that homeowners also be encouraged to plant trees to shade the routes children take past their homes to school.

**100.10.130 – Parking Lot Canopy Cover / Shade**

Retail parking lots often have trees planted for shade, but the trees are drastically pruned to maintain sign visibility for passing motorists. The long-term maintenance plan should address this issue. The ordinance should also stipulate penalties for maintenance practices that preclude trees from reaching mature canopy size.

Thank you for your consideration of these comments and recommendations. If you have questions or need additional information, please contact me at (916) 709-9843 or [cholm@walksacramento.org](mailto:cholm@walksacramento.org). We'd also be happy to meet with you to discuss the model ordinance draft in more detail.

Sincerely,

A handwritten signature in black ink that reads "Chris Holm". The signature is written in a cursive, flowing style.

Chris Holm  
Project Analyst