Letter
O20

From: Anne Fege
To: CAP; Soffel, Maggie
Subject: Comments on County Climate Action Plan, comment letter attached
Date: Monday, September 25, 2017 1:39:56 PM
Attachments: CountySD_CAP_Ltr from SDRUFC_25sep17.pdf

Thank you for the opportunity to comment on the draft Climate Action Plan. O20-1

/s/ Anne Fege Anne S. Fege, Ph.D.
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Response to Comment Letter O20

San Diego Regional Urban Forests Council
Anne S. Fege, Ph.D., M.B.A., Executive Team
September 25, 2017

O20-1 This comment provides introductory remarks. No response is required.

San Diego Regional Urban Forests Council
A Chapter of the California Urban Forests Council
www.sdrufc.com

September 25, 2017

Planning and Development Services
County of San Diego
5510 Overland Avenue, Suite 310
San Diego, CA 92123
Attn: Maggie Soffel, Land Use/Environmental Planner, CAP@sdcounty.ca.gov

Re: Draft Climate Action Plan (CAP) for the County of San Diego

The comments and recommendations in this letter are offered by the San Diego Regional Urban Forests Council, which is a coalition of agencies, businesses and educators working to improve urban forest assets. We promote the benefits of trees for a cleaner, healthier, and more prosperous region.

The County is to be commended for including tree planting in the Climate Action Plan. The benefits of trees are clearly articulated in Chapter 4, Climate change vulnerability, resiliency, and adaptation, and in the introduction to Strategy A-2, Increase carbon sequestration. O20-2

We offer the following comments and recommendations:

T-2.1: Improve Roadway Segments as Multi-modal. We support the focus on "complete streets," including planter strips with street trees. Complete streets are an important strategy for stormwater management. Trees slow the velocity of rain, allow for stormwater retention, and reduce erosion. This goal can and should include a target (outcome) for trees planted in complete streets. O20-3

T-4: Invest in Local Projects to Offset Carbon Emissions. Reforestation is listed as a possible project type and protocol to consider. As only the riparian areas, oak meadows and mixed conifer forests at 5,000-ft elevation are natural forests, the potential is quite limited. With climate warming, summer heat may be more extensive and winter temperatures warming, thus increasing risk for successful investments in trees in the built environment or reforestation in local natural settings.

Consideration needs to be given to the requirement in carbon offset protocols that projects must achieve greenhouse gas (GHG) reductions and removals beyond that projects that are above and beyond any GHG reductions or removals that would result from compliance with any federal, state, or local laws and ordinances. O20-4

O20-2 The comment provides background information about the San Diego Regional Urban Forests Council and expresses support for the inclusion of a tree planting requirement in the CAP. This comment is acknowledged. The comment does not address the adequacy of the Draft SEIR. The comment will be included as part of the Final EIR and made available to the decision makers prior to a final decision on the project.

O20-3 The comment expresses support for complete streets policies that include trees and planter strips. This comment is acknowledged. GHG Reduction Measure T-2.1 would implement a "complete streets" approach to reduce VMT. This comment does not address the adequacy of the Draft SEIR. The comment will be included as part of the Final EIR and made available to the decision makers prior to a final decision on the project.

O20-4 The comment appears to state that that projects considering use of carbon offset protocols must achieve GHG reductions above and beyond any GHG reductions that would result from compliance with any federal, state or local laws and ordinances. The County will track emissions reductions through a CARB-approved registry or a registry through the SDAPCD. Carbon offset registries have developed a broad consensus around the performance standards that are necessary to ensure that offsets are verified and monitored and are additional to any offset otherwise required (CEQA Guidelines Section 15126(c)(3)). Direct investments are identified in GHG Reduction Measure T-4.1 and as described in the CAP are one tool that the County can use to adaptively manage the achievement of identified 2020 and 2030 reduction targets. Please refer to Master Response 3 for additional information about the direct investment program.

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W-1.2: Reduce Outdoor Water Use. Title 8 of the San Diego County Code (Water Conservation in Landscaping Ordinance) already addresses tree spacing and irrigation zoning, but should be amended to consider soil conditions, favor drought-tolerant and native trees, and maximize canopy size (for both cooling and stormwater retention). Trees actually reduce the water needs of other vegetation, as they cool and shade other landscaping. O20-5

W-1.3: Reduce Potable Water Consumption at County Facilities
The replacement of landscaping with artificial turf is not a sound approach for either climate action or public health. Although this is proposed for County Buildings only, public practices are presumed to be recommendations for the rest of the community. Artificial turf is not sustainable, as it requires water for cooling and cleaning, and creates air and water pollution (including crumb rubber particles). Artificial turf has a lifespan of ten years, and is not easily recycled. It is exceptionally hot, often as hot as pavement, thus adding to the urban heat island effect and energy demand for urban cooling. When installed, the ground is compacted, which greatly reduces water infiltration stormwater runoff. Better options are local wood chips, stone, concrete, or other materials (not rubber). O20-6

A-2.1: Increase Residential Tree Planting. We support requiring two trees to be planted for every new residential dwelling unit, focused on planting drought-tolerant and native trees.

We recommend that A-2.1 be extended to commercial development, so that trees are planted to provide shade for buildings and parking lots. The number of trees should be based on the total "footprint" of each development. Provisions need to be made for long-term maintenance of commercial trees to ensure their longevity, and for replacement of dead trees. O20-7

Trees should be located, installed, and maintained using industry standards, to ensure their longevity and benefits. All County-approved projects should follow the ANSI A300 standards for tree care practices, which address nursery quality, soils, root pruning, and other topics, posted at http://www.tcia.org/TCIA/BUSINESS/ANSI_A300_Standards_/TCIA/BUSINESS/A300_Standards/A300_Standards.aspx. The best way to sequester carbon, and to reduce energy and water use, is to reduce the need for costly maintenance, improve the inspection process, and keep trees healthy.

A-2.2: Increase County Tree Planting. A tree planting program for County lands will provide many benefits in County parks. This tree planting should be supplementary to the replacement of trees killed by the Gold-spotted Oak Borer, other pests, and long-term drought conditions. The county land types should be identified, as there is may be opportunities on non-Park lands. Tree species selection should consider long-term drought predictions, and other changed conditions due to climate change. O20-8

The action to complete a Tree Canopy Assessment by 2025 should be shifted to 2020, because the Light-detection and Ranging (LiDAR) remote imaging is already available (at about 4" resolution). The data analysis is inexpensive, based on the recent analysi,s by the University of Vermont, recently of the LiDAR data from the 18 cities in the County, for less than $100,000.)

Climate Change Vulnerability, Resiliency, and Adaptation. Prepare for Increased Flooding Risk. Trees are an effective strategy for managing stormwater and preventing erosion. They should be O20-9

O20-5 The comment suggests that soil conditions, native species, and canopy size policies should be added to the County's Zoning Code Section 8. Appropriate amendments to various sections within the County's Water Conservation in Landscaping Ordinance would be made to adequately align with the final version of the approved CAP. Additional sections may be added to be compliant with the CAP as needed.

O20-6 This comment suggests that the replacement of landscaping with artificial turf at County facilities is detrimental for several reasons. The County would like to clarify that artificial turf is one of several options under consideration to reduce water consumption at County facilities. The pros and cons related to the use of artificial turf will be considered prior to installation at each specific facility. In addition, the County Board of Supervisors has initiated a Water Management Plan and Program to conserve water throughout all County-owned and operated facilities, and that all such facilities are required to be compliant with the Water Conservation in Landscaping Ordinance, as described in Board of Supervisors Policy A-106.

O20-7 The comment supports planting two trees for every residential unit, recommends expanding this requirement to commercial development, and states that trees should be located, installed, and maintained using industry standards. Commercial properties are not included in this requirement at this time as they already have requirements for tree planting contained within community design guidelines and the parking design manual. Sufficient trees are required of these properties to satisfy this measure and additional trees may conflict with fire protection requirements. The County will review the Tree Care Industry Association's ANSI 300 Standards for tree care practices as this measure moves forward. Amendments to the Water Conservation in Landscaping Ordinance and/or the Water Efficient Landscape Design Manual may be considered in relation to A-2.1.

O20-8 The comment states that the CAP tree planting program should be supplementary to the replacement of trees killed by the Gold-spotted Oak Borer, other pests, and long-term drought conditions. The comment also states that the tree canopy

		assessment should be completed by 2020 instead of 2025. As a component of the Gold-spotted Oak Borer (GSOB) Integrated Pest Management (IPM) Program, County of San Diego Department of Parks and Recreation through County of San Diego Department of Agriculture, Weights, and Measures has initiated pesticide treatments of oak trees located in eight County Park facilities. Each tree identified for treatment is currently infected with GSOB. The focus of this IPM program is to apply a barrier treatment to prevent the egg hatching/adults emerging from the tree trunk. This treatment program is based on the GSOB recommendations from University of California Cooperative Extension Integrated Pest Management Program and U.S. Forest Service research from field trials. A pesticide with the active ingredient Bifenthrin has been sprayed on infected trees from base to first branch. DPR plans to continue budgeting for GSOB spraying. The tree canopy assessment will be completed by 2025, as stated within the Draft CAP. Although the comment states it should be done by 2020, there is no substantial evidence or other reason provided for the County to conduct this voluntary assessment earlier; therefore, no further response is required or necessary.
	O20-9	The comment states that trees should be mentioned in the list of preparedness initiatives, planted in landscaping, and replanted in bare and disturbed areas. This comment does not relate directly to the CAP or address the adequacy to the Draft SEIR and no further response is required. However, in an effort to be responsive, the following is noted. The County's Department of Parks and Recreation (DPR) only plants drought tolerant or native plant species. During the first year of the establishment period, water is needed to keep these 3,500 trees alive. Once their established, little or no irrigation is required. In high access zones (picnic areas, campgrounds, playgrounds, staging areas, main trailheads, community parks), where irrigation systems are present, DPR keeps sprinkler heads vertical and at the correct height for good coverage keeping the spray pattern uniform. DPR specifies landscape designs that minimize run-off. For example,

	landscapes that allow for the use of drip or bubbler irrigation versus overhead spray systems. In using drip emitters, the water is distributed very accurately at the root zone of the tree. DPR currently uses Calsense controllers for flow monitoring, water management, detection of breaks, and collect and analyze data. If necessary, DPR uses multiple stop/start irrigation settings to allow sufficient soak-in time. DPR complies with the CA Water Code's Storm Water Pollution Prevention Plan. DPR uses landscape mulch or landscape fabric to minimize evaporation. Drip irrigation in conjunction with mulch is optimum when drought tolerant plant palette is used. DPR uses canopies and shading elements to reduce heat gain and minimize evapo-transportation. DPR also improves soils to absorb and retain more water, replace irrigated landscapes with rock gardens or other non-irrigated components. Please also refer to response to comment O23-31.

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explicitly mentioned in the list of preparedness initiatives, planted in landscaping, and replanting of bare and disturbed areas. O20-9 cont

Appendix A: Draft Climate Action Plan Consistency Review Checklist.

12a. Tree planting. For residential projects, the description (12b) needs to include confirmation that the irrigation system will support tree establishment and health.

9a. Residential. For residential projects, the Landscape Document Package needs to confirm that the irrigation system will support tree establishment and health. Trees need infrequent deep watering, and installations need to follow the ANSI A300 standards referenced above. O20-10

9b. Non-Residential. The developments need to include tree planting and care, and confirmation that the irrigation system will support tree establishment and health. Installation and maintenance needs to follow the ANSI A300 and county landscaping code.

Thank you for the opportunity to comment on the draft Climate Action Plan, and to ensuring that local policies and field practices provide for quality planning, installation, and maintenance of trees. O20-11

Sincerely,

Anne S. Fege

Anne S. Fege, Ph.D., M.B.A.
Executive Team, San Diego Regional Urban Forests Council

And Retired Forest Supervisor, Cleveland National Forest
Adjunct Professor, Department of Biology, San Diego State University

O20-10 The comment identifies sections of the Draft CAP Consistency Checklist where it should state that "irrigation systems will support tree establishment and health." The County's Certificate of Completion (Section 86.725) would be revised to ensure long term compliance for these trees as implementation of this Measure moves forward. Revisions to the County's Prescriptive Compliance Option (Section 86.722) will be made to require tree planting for those projects that do not submit a formal Landscape Documentation Package. Section 86.709 (h) of the County's Water Conservation in Landscaping Ordinance (10427) already addresses irrigation design for trees, requiring separate valves when feasible and to anticipate the mature size and extent of the root zone when designing the irrigation system. As part of the Landscape Documentation Package submittal requirements, PDS Form 405 (Water Efficient Landscape Worksheet) requires the establishment of water budget calculations that will take into consideration the amount of water a particular tree species will need to maintain its longevity on an annual basis. The amount of water necessary during the establishment period is addressed in the irrigation scheduling portion of the Certificate of Completion (Section 86.726).

O20-11 The comment provides concluding remarks. No further response is required.