

Trees & Forests Advisory Committee

Draft Comments Regarding the Tree Planting Strategy Update

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1.0 Preamble

The first municipal Tree Planting Strategy, a sub-strategy of the 2014 Urban Forest Strategy, ran from 2017 – 2021. The next strategy is now being planned, and TFAC members have been asked to provide some initial comment to help guide the development of the next strategy.

Broadly speaking, we believe the City should leverage and build on successes it has had so far with the Tree Planting Strategy 2017-2021.

However, multiple committee members felt that there was a need for a more detailed summary of what had been accomplished with the Tree Planting Strategy to date, including, for example, total trees planted relative to target on both public and private lands, in order to provide effective recommendations.

2.0 Background Information Required

- 1) It would be helpful for the background report to include a table showing how many trees were expected to be planted in each type of space between 2017 – 2021 (e.g., street trees, other city trees, private land trees, etc.), and the totals that were actually achieved.
- 2) A summary (perhaps, again, a table) of anticipated challenges during the next strategy period would be beneficial.
- 3) More information about how much space is believed to be left on City land. For instance, the staff report notes that the City is running out of space for street trees (p.7) but does not explain how many spots in the inventory are left or how long it is expected to last. Is the street tree “plantable spots” inventory sufficient to cover the next strategy period, or not?

- 4) Greater discussion around the implications of the shortfall on private land planting targets to date (p. 6 of the Nov. TFAC package), and what options are available to mitigate this. (E.g., could more trees be planted on City-owned land to compensate, or is that not expected to be possible?)
- 5) More information about how tree planting is covered in the climate emergency action plan, and how the TPS and CEAP will be linked. Is tree planting for carbon sequestration expected to be a part of the City's response to climate change? If so, are there details somewhere about how much carbon the City wishes to sequester to reach its 2050 net zero goal (vs. doing emissions reductions), the number of additional trees that will require, and when those trees must be planted? (p. 8) If the Tree Planting Strategy must achieve even higher levels of planting than previously planned in order to achieve municipal carbon sequestration (as opposed to just "canopy cover") goals, that is something we will all need to know.
- 6) On p. 7 of the TFAC package it says: "Due to the challenge of competing uses for our open spaces, the City will revisit the opportunity to plant more trees in many of its parks". What does this mean? That staff think they might be able to plant more in open spaces, or that they think they will have to plant less? If the latter, the combination of planting shortfalls on both public and private land would seem to present serious challenges for the next strategy.
- 7) TFAC had an earlier recommendation around starting tree planting in new subdivisions earlier (e.g., if subdivision was half-complete, planting trees in the half that was complete rather than waiting for the entire subdivision to be completed to begin). Has any progress been made with this item, and if not, could it become a part of the Tree Planting Strategy?
- 8) Generally speaking, we could use more detail in the staff progress updates on various specific action items from the first TPS (pages 28 - 32 of the November TFAC package). Items of particular interest to TFAC members include:
 - Action Item 1.1: "Reduce new tree mortality in year 1 to 4% or less, and no more than 3% mortality in year 2 and 2% mortality in year 3." What success has been made with respect to reducing tree mortality?

The status update in given to TFAC for this item was "giveaways continue to provide opportunity to discuss planting techniques with recipients. Recommend carrying over into next Tree Planting Strategy." But that's not really a specific number, and not enough to evaluate success so far on this

specific item. A table of survival rates by type of planting location may be helpful.

- How is the City achieving Action 2.1: “Naturalize wherever possible”? What systems are in place to assess naturalizable space? This item is described as “Substantially complete”. Does that mean there is no space left to naturalize, or just that there is a system in place to identify them?
- For Item 2.3: “Assess encroachments of City lands and implement restoration or licensing; allocate realized fees to tree planting and tree maintenance program” Would it be possible (allowable) to have a formal, pro-active encroachment-combatting program rather than just a complaint-driven one? Since tree planting is a public good, it seems likely that few people would actually complain about such encroachments, for fear of upsetting their neighbours, if nothing else. The City should not have to depend on private citizens to enforce its own policies.

2.1 Other Challenges in Measuring Success

Multiple TFAC members continued to stress the difficulties in assessing progress with both the Tree Planting Strategy and the Urban Forest Strategy.

In particular, it is difficult to understand:

- Where trees are being gained vs. lost (on private land, public land, in ESAs, in certain target neighbourhoods, during the development process, etc.)
- If the 1.9% increase in canopy cover is the product of better tree protection of existing trees, reduced cutting, or new plantings.

It could well be that the gains would be much more significant, but that many trees were lost during this period that might otherwise have been protected. Perhaps all the gains are the result of tree growth (protection & maintenance), and very little is coming from planting... or vice versa! We need to understand the forces working for *and against* increased canopy cover. Too much emphasis is put on understanding planting and not enough on understanding loss.

Without tools to understand the changes in canopy cover that we are seeing, it is hard to know what policies or programs are being most effective in increasing cover, or where we might be falling short.

There should be a comprehensive “State of the Forest” report, as called for in the Urban Forest Strategy’s 2014 Implementation Strategy, that goes into more detailed metrics than just canopy cover totals. This report should collect up all the key forestry-related metrics into one document so they – and their implications - can be considered together. Metrics should include, but not be limited to:

- Total # of trees lost to development each year (so we can see which way it is trending)
- Total # of cutting permits approved vs. rejected through the Tree Protection By-Law
- Total # trees planted on city owned land (street trees, park trees, and other)
- Total # of replacement trees planted (vs. total # of replacement trees that “should” be planted)
- Total # of trees maintained through the Veteran Tree Incentive Program
- Total # of trees planted through TreeMe
- Scope of the watering program each year, and what impacts have been seen on the rate of replacements for newly planted trees under warranty
- Breakdown of City tree planting by size class (small, medium, large) and status (native, continentally native, non-native, invasive)
- Age profile of trees in the City’s “street tree” inventory (to see if trees are living longer or dying sooner)
- # of plantable locations still remaining in the City’s street tree inventory, and how long is this space expected to last
- Cost per tree values for both tree planting and protect
- % change in canopy cover, and a breakdown of where it is occurring (e.g. by land use type, by public vs. private land, etc.)
- % change in woodland cover
- Etc.

This report should be shared with City Council, relevant standing and advisory committees, and any involved or impacted City departments on an annual basis. There needs to be one place to find and understand what is known about changes to London’s urban forests, and the impacts City policies and partnerships are having on it, rather than having to request it piece-meal. Once the template is created, it should be much easier to update over time.

The data in the report should also present tables with results from past years, both to serve as a benchmark and to provide an opportunity for analysis of trends over time. Without those benchmarks, a true picture of the program cannot be given. It also provides a rate of decline because destroying trees and planting trees to maturity occurs at different scales of time. Destroying trees can happen overnight. Reaching maturity takes decades.

3.0 Tree Planting Strategy: Coverage Period & Timing

While we strongly support the idea of aligning the timing and coverage of the Tree Planting Strategy to align with the City's four year budget cycle, we are concerned by the two year gap in Tree Planting Strategy coverage that would be created by delaying the launch of the new strategy until the start of the next budget cycle, which will run 2024 - 2027.

As such, it is recommended that in the two year interim, the City:

- Maintain work and continue to report progress on activities identified in the 2017 -2021 strategy
- Take early steps towards larger project items planned for the 2024-2027 strategy (pilot projects, development of key metric tools and reporting frameworks, etc.)
- Ensure that plantings in this period continue to ramp up in accordance with the annual targets laid out in the initial strategy

Alternatively, civic administration could look at making this strategy a longer strategy so as to coincide with the end of the next four year budget cycle, and then start doing four year strategies after that. The first Tree Planting Strategy spanned five years; going this route would make the second Strategy six years in length.

We would further recommend that staff consider designing future updates to the Urban Forest Strategy's Implementation Plan to align with the four year budget cycle as well. TFAC would also like to request a brief update from staff about the timeline for updating the Implementation Plan, which was originally published in 2014 and is now at the point where all remaining actions should be "long term" actions, which is perhaps not the most useful.

4.0 Specific Recommendations for the Next Tree Planting Strategy:

Generally speaking, we agree with comments from staff about carrying over incomplete items from the first Tree Planting Strategy into the new one.

Additionally, we would recommend that:

- 1) The City continue to work to achieve its tree planting goals, and allocate the funding necessary to do so.
- 2) Given the exceptional inflation over the past year, the City should explore the potential need to actually increase the total funding planned for the strategy.
- 3) The area considered under the Urban Forest and Tree Planting Strategies be expanded to include the full municipality, rather than just the area within the Urban Growth

Boundary. This will allow rural Londoners to participate in programs as well. However, if doing so, the City should be clear about the impact on its targets, and, if applicable, how they were recalculated.

- 4) The Tree Planting Strategy should more clearly identify what the biggest barriers to London's planting goals are. Wherever possible, we would ask that staff be specific and provide examples, as committee members found this helpful in the most recent report (e.g. the examples given around driveways and utilities in front yards).

Actions focused on enhancing the ecological benefits of planting

- 5) Increased emphasis be placed on planting trees to create or expand woodlands and wildlife corridors, rather than just standalone trees which offer less habitat and ecological value.

As was noted many years ago with respect to the Urban Forest Strategy, the Tree Planting Strategy seems to greatly downplay "forests" in favour of "trees". For example, in item 2 of page 9 of the November TFAC package, it seems to be saying that we could increase the net canopy cover if we include orchards and 'barrier' tree plantings on farms. While these trees do provide some ecological value in the absence of native tree canopies, they should not be considered as an appropriate substitute for a 'forested' tree canopy that provides broader habitat and carbon needs especially if the farms are not organic. The same is true for encouraging local fruit and nut tree farms.

- 6) Naturalization projects be planned to incorporate not just trees, but native shrubs, grasses, and wildflowers as well, thereby increasing the ecological benefits they offer, both to the larger community and to the newly planted trees themselves

Actions to increase canopy cover more effectively

- 7) The City eliminate the "opt-out" option for street trees for new home owners. Street trees dramatically improve walking conditions for pedestrians along sidewalks, and those pedestrians should have the right to infrastructure supportive of active transportation, particularly if the City is looking to combat climate change. Home owners should no more be able to opt out of street trees than they should be able to opt out of the sidewalks themselves.
- 8) We strongly support the creation of a Shade Policy for London, which was an earlier recommendation of TFAC's. This sort of initiative could be framed not only in terms of environmental benefits, but also benefits to pedestrians, cyclists, and other users of active transportation (and the climate benefits active transportation brings), reduced energy costs for cooling, as well as to children for outdoor play.

- 9) The strategy should explore ways to enhance opportunities for large species of shade trees, rather than small ornamentals, during the development process.
- 10) There have been several instances over the past few years where there has been significant cutting in recently planted naturalization projects. Obviously, newly planted projects cannot significantly contribute to canopy cover if they never make it to maturity. More needs to be done to prevent plantings where cuttings will take place, or, more preferably, to preserve plantings once they are complete. (E.g. – to reroute some of the pipes, rather than to cut down the trees).

Where trees must be removed, the City should arrange for them to be moved wherever possible, and, where not, for replacement trees to be planted. For community partner projects, this work should be done by contractors, and not asked of the community partners and their volunteers. Volunteers should not be asked to have to do plant rescues after having already donated their time to do the planting in the first place, nor should the community groups who spent their time fundraising to complete them be asked to fundraise again to save them. It is an extremely disheartening experience, and a difficult one for community partners to explain to both their volunteers and their donors. There should be formal policies or guidelines at the City to explain what should happen when these circumstances arise.

Actions to help plant trees where they are most needed

- 11) The Tree Planting Strategy should include mapping to identify where the tree ‘deserts’ are within the city such as the core, and make these communities a priority.

Actions to increase public land planting

- 12) That in light of comments in the November memorandum from staff around the steady loss of available City lands for planting as they get planted up, the next Tree Planting Strategy clearly outline how the City will achieve its own public land planting goals.
- 13) For Item 2.7 “Utilize vacant public lands for tree planting”: we recommend making this a priority, especially as places for street tree plantings are expected to soon (?) run out. (Current status is described as: “Delayed. Will likely be informed and implemented through the Climate Emergency Action Plan. Recommend deferring to Climate Emergency Action Plan”)

Actions to increase private land planting

- 14) Given that there was a shortfall in private land planting during the implementation of the first TPS (as mentioned in the memorandum), it is recommended that funding be increased to existing program or new programs or communication initiatives be explored in order to compensate for this shortfall.

15) TFAC members agreed that the application process for TreeMe and VTIP, and the technical expertise residents may feel is required, may be off-putting and reduce the subscription rate to these valuable programs. As such, we support the staff suggestion for creating a “one stop shop” private land planting initiative.

We would suggest such an initiative include:

- a. Provide for staff to help residents, business owners, community groups, etc. plan and implement their planting or tree care projects (thereby eliminating technical barriers)
 - b. Not just offer free or low cost trees, but also a planting service for those who need it
 - c. Offer trees in a range of sizes (perhaps dependent on land use)
 - d. Include programs or projects that deliberately target the least-tree neighbourhoods in London, and/or participants facing additional barriers to planting
 - e. Include a significant advertising and outreach plan to promote the program and how easy it makes contributing to London’s forestry goals
 - f. Be multi-year (preferably 4 years) to allow for retention of experienced staff and continuity between years with landowners part-way through planning a planting project
- 16) We strongly support staff recommendation #3: “Consider developing a policy and/or easement agreement to plant and maintain city trees on private lands, subject to landowner consent, with a focus on trees adjacent to streets.”
- 17) For “Item 3.4 Create a tool lending library; donate tree care equipment”: The City may wish to explore having additional lending libraries set up with other community partners who already have and sometimes lend out tools (e.g. ReForest London, which has an informal program in place to rent “weed wrenches” to Londoners who wish to borrow them, but potentially other planting organizations like UTRCA, KCCA, Urban Roots or LEN as well)
- 18) That the City support and, where applicable, renew its commitments to, existing initiatives with community partners aimed at inspiring and driving planting on private land, such as London's Million Tree Challenge (milliontrees.ca) and Depave Paradise (www.londonenvironment.net/depave_paradise), and work with community partners to find new ways to leverage their programs and networks in support of the Tree Planting Strategy.

- 19) That residential planting initiatives target all types of residential, including condominiums.

Actions to reduce impacts from development

- 20) The committee strongly supports exploring opportunities for depaving, as mentioned on p. 9 of the November TFAC package. In addition to depaving, it is recommended that the City explore reducing or even removing minimum parking requirements in order to reduce the amount of land dedicated to asphalt in the first place. Meanwhile, minimum planting requirements should be increased wherever possible.
- 21) It is recommended that the City find ways to preserve more lands for planting throughout the development process (e.g. to prevent loss of planting space through loss of setbacks, positioning of utility lines and driveways, etc.)
- 22) The staff report noted: “The interval between a tree planting plan being approved and implemented exceeds one year for about 90% of all sub-divisions. Most commonly, house designs may be discovered to be flipped over (mirror imaged) and driveways widened, with additional parking, and side-paths to the front door added. This feature is encouraged by continuous or near continuous dropped curbs along the entire lot frontage. Utilities would, in most instances be installed where the driveway was expected to go. As a result, moving the driveway to the other side of the lot, and/or widening it, can leave no room for a large growing or any street tree along that lot frontage.”

TFAC would recommend that that:

- a. It be made a requirement of the development process that all house designs (and accompanying parking and path layouts) must allow room for a street tree each
 - b. Wherever possible, hydrolines should be buried to allow for the planting of larger species of trees along sidewalks (vs. the small ornamentals being planted in many neighbourhoods with overhead wires today)
 - c. If possible, that site plans require planting in yards as a condition of approval. (I.e., that when someone buys a home in a new development, it comes with trees already in the yard).
- 23) More be done to ensure staff in other departments, and especially development services, are familiar with both the Urban Forest Strategy and the Tree Planting Strategy

Actions to explore new opportunities

- 24) The committee strongly supports the recommendation around doing a Request for Information for a community tree nursery.

- 25) With regards to watering, it is recommended the City investigate why Toronto uses gator bags so much (e.g., if they offered significant improvements over watering trucks) and if there would be value in bringing that model to London.
- 26) In addition to exploring more salt tolerant species of trees, it is recommended that the City also explore non-salt options for de-icing, which would be less harmful to trees in the first place, as has been done in Waterloo.
- 27) The City explore developing stronger soil standards for boulevards as well as larger planting beds where appropriate.

Actions to improve data analysis & reporting

- 28) We recommend that the City or a community partner begin collecting contact information at the National Tree Day Giveaways so as to allow follow-up surveys regarding planting locations and survival rates. ReForest London staff note that they have not seen any indication among tree recipients at their own giveaways that the request for contact information is off-putting or likely to diminish uptake for free trees, and that any concerns here are likely outweighed by the benefits that come from being able to follow-up with residents about tree care tips and the like.

Miscellaneous

- 29) It would be helpful if future memoranda could be paginated to improve ease of referencing
- 30) We would recommend there be specific communication & outreach actions included within the next strategy, as this seemed to be one of the more challenging items to complete
- 31) With regards to graphics for the next Tree Planting Strategy, if reusing graphics from the previous strategy, we would suggest:
 - On page 3 of the Tree Planting Strategy doc, add in an element representing “City of London Climate Emergency”
 - On page 9 of the Tree Planting Strategy doc, the graph is too difficult to make sense of. Consider splitting it into two graphs.
 - On page 10 of the Tree Planting Strategy doc, clarify difference between solid line and dotted line on graph.