

Planning and Transportation Commission Public Comment 9-12-18

From: [shani.kleinhaus](#)
To: [Planning Commission](#)
Cc: [Passmore, Walter](#); [Martineau, Catherine](#)
Subject: Tonight's discussion of the Palo Alto Municipal Code Title 8 Revisions
Date: Wednesday, September 12, 2018 2:34:37 PM
Attachments: [091218_SCVAS_PA Title 8 revision.pdf](#)

Dear Chair Lauing and Planning Commissioners,

Please see attached Santa Clara Vally Audubon Society's comments on the Palo Alto Municipal Code Title 8 Revisions to be discussed at the Planning Commission meeting tonight.

Thank you,

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September 12th, 2018

Palo Alto Planning Commission,
City of Palo Alto

Re: Palo Alto Municipal Code Title 8 Revisions

Dear Chair Lauing and commissioners,

On behalf of the Santa Clara Valley Audubon Society (SCVAS) and as a Palo Alto resident, I was appointed to the City Advisory Committee for the Comprehensive Plan update, and participated as a stakeholder in the development of the Urban Forest Master Plan. I also participated in meetings with staff regarding the Palo Alto Municipal Code Title 8 Revisions. In each of these working groups, the upkeep, regeneration, aesthetic and ecological value of the Urban Forest was of critical importance to the working groups, and a topic of great concern and appreciation by the public.

I am extremely appreciative of staff work on the proposed Palo Alto Municipal Code Title 8 Revisions; they navigate changes to State and City Plans to reflect public interest and sentiment. I am supportive of most of Staff recommendations, and would like to offer a few comments:

1) Section 18.10.020 (j) protected trees states, "(3) Any tree larger than **36 inch Diameter** of any species excepting those exotic and invasive species described as weeds 18.10.010 and those species classified as high water users by the water use classification of landscape species list approved by the California Department of Water resources."

- I believe it is a typo using diameter and the intent is circumference? A 36 inch Diameter would be 9.4 feet circumference! Other protected trees described in sections 1 and 2 are described by diameter and circumference, for consistency should trees in 3 should be as well.
- It is not clear that protection for well-established trees is broad enough here. There may be trees we would not plant today that are on the state list as high water users but they are well established and conditioned to our local climate and water table. These trees

should be protected as they provide shade, structure and canopy. It is a long term goal of the Comp Plan to increase the Canopy to 50%, Policy N-2.7

2) Please consider notification to neighbors on planned removal of trees, and provide the community with the opportunity to appeal tree-removal decisions. Currently, only applicants can appeal (see 8.10.140 Appeals.) Community sentiment and the Comp Plan Program N2.10.3 supports such notification and appeal process.

3) The change of language from Chapter 8.10 Landscape and Tree **Preservation** and Regulations to Chapter 8.10 Landscape and Tree **Management** Regulation is unnecessary and disturbing.

5) 18 10.110 Enforcement Section (b) (2) caps unlawfully removed tree replacement at \$5,000.00. This seems like a very low bar, especially if an ancient oak is involved. Some trees are priceless!

6) While some have made the argument that redwoods (*Sequoia Sempervirens*) are not native, Palo Alto is named after a redwood tree, and they are native to parts of Palo Alto - see distribution map <https://calscape.org/Sequoia-sempervirens-/>.

Santa Clara Valley Audubon Society strongly support the expansion the definition of “protected tree” to all native trees and the other changes proposed for section 8.10.020.

Thank you for your time and consideration.



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