

**RESPONSE TO TOWN OF PELHAM- TREE MAINTENANCE POLICY  
POLICY #S802-01, REVISION DATE-August 8, 2021**

TO: Mr. Ryan Cook, Manager of Public Works  
Ms. Holly Willford, Town Clerk

September 14, 2021

Dear Mr. Cook and Ms. Willford:

We, of the Pelham Tree Conversation Society (PTCS), are again pleased to submit our comments and recommendations pertaining to the TOWN OF PELHAM- TREE MAINTENANCE POLICY, POLICY #S802-01, REVISION DATE-August 8, 2021.

By way of background, on Friday August 27<sup>th</sup>, 2021 members of the PTCS along with Councilors Wayne Olson and Bob Hildebrandt meet with Mr. Jason Marr, Director of Public Works and Mr. Ryan Cook, Manager of Public Works, to discuss changes and revisions to the TOWN OF PELHAM- TREE MAINTENANCE POLICY, POLICY #S802-01. Much of this discussion was focused upon a review of the PTCS document as previously submitted to Council, dated July 17, 2021. We believed that meeting was candid and on the whole fruitful, and we felt there was genuine mutuality demonstrated in our collective attempts to make improvements to the TOWN OF PELHAM- TREE MAINTENANCE POLICY.

The above noted, there are several issues which may simply have been overlooked and/or were not adequately addressed in the revisions made to TOWN OF PELHAM- TREE MAINTENANCE POLICY, POLICY #S802-01, REVISION DATE-August 8, 2021. These issues are delineated forthwith.

**Section 1. PURPOSE:**

Mr. Cook has stated;

g) Opportunities shall be provided to educate the citizens of the Town of Pelham on the ecological, aesthetic, economic and social benefits of trees.

**The PTCS suggested and we understood Mr. Cook agreed to:**

g) Opportunities shall be provided to educate the town council, staff, contractors and citizens of the Town of Pelham on the ecological, aesthetic, economic and social benefits of trees.

**Section 9**

Mr. Cook has stated;

9.5 The Town of Pelham Public Works Department endeavours to replace all trees removed within the following calendar year.

**The PTCS previously advised that timely replacement of trees should not be optional. In fact, we would highly suggest a plan for being proactive by replacing trees in the planning stages PRIOR to the others coming down. This is more cost effective and creates better establishment of our urban forest. In many older sections of Pelham we have older trees. We**

**need to be planning for their replacement now and not wait until they die. To the casual observer there is often a space available where a new tree can be planted near to an older one.**

A major concern of the PTCS (and we know for many citizens of Pelham), is the issue of municipal construction activities and the loss and/or damage to trees that result from construction. In the current Tree Maintenance Policy there is very little attention paid to the issue of construction (yet, this activity has significant negative impacts upon municipal trees as we have witnessed time and time again). Related to this issue we submitted the following recommendation for an addition to the Tree Maintenance Policy (**13. Construction Activities**). In the August 27<sup>th</sup> meeting pertaining to this issue Mr. Cook advised that he would again look at our recommendation but made no commitment to including it in the revised Policy. As evidenced by not addressing our recommendation in his revised Policy, evidently Mr. Cook has totally rejected our recommendation. The PTCS is extremely disappointed by this and we therefore appeal to Council to address this critical matter when it comes to preserving the municipal trees of Pelham.

**As follows is the recommendation made in the PTCS July 17, 2021 submission to Council:**

### **13. Construction Activities**

13.1 Staff will perform ISA tree inspections and update the inventory of trees in the construction zone (if not already inventoried) prior to draft plan approval at all construction projects and in locations prior to the initiation of any projects where trees may be affected.

13.2 Upon approval from the Town and the Forestry Committee, a healthy tree may be removed when new construction is proposed in the vicinity and it is substantially more economic to remove the tree, or if there are no suitable alternatives available.

13.3 Any trees designated for removal will be well marked at the trunk a minimum 30 days before scheduled removal. TOP will respond on a timely basis to citizen's request for information regarding reason(s) for tree removal and if any alternatives have been considered.

13.4 In TOP construction contracts, contract language should include the requirement that the contractor take utmost care and diligence as well as utilize appropriate construction techniques when working around living trees so as to minimize damage to the tree and its root system. This also applies to TOP staff performing construction/repair activities.

13.5 When a contractor has seriously damaged or destroyed a tree, the contractor will reimburse the TOP costs following the sliding scale (see section 9.4) for tree replacement.

13.6 Trees within or adjacent to a construction site must be protected during construction by means of a barrier installed and meet the following specifications:

- a. Tree protection barriers must be erected prior to the commencement of any construction activity that may injure a tree on the site and are to remain in place throughout the entire duration of the project. The applicant shall notify the appropriate Town department in writing prior to commencing any such activities to confirm that the tree protection barriers are in place.
- b. The tree protection barriers specified herein must remain in a condition satisfactory to the Town until all site activities including landscaping are complete.
- c. Authorization from the appropriate Town department must be obtained prior to the removal of tree protection barriers.
- d. If some fill or excavated material must be temporarily located near the tree protection barrier, a wooden barrier must be used to ensure no material enters the TPZ.
- e. A sign, provided by the Town will be paid for by the applicant and mounted on one side of a tree protection barrier for the duration of the project.

As you are aware (as evidenced in section 13.2 above), the PTCS has recommended for the creation of a Forestry (Tree) Committee for the Town of Pelham, much along the same lines as other citizen based committees exist. This matter was briefly discussed at the August 27<sup>th</sup> meeting. We noted Mr. Marr voiced his support for this idea, with the qualification that such a Committee should not be formed in order to interfere with the day-to-day operations of the Public Works department. He advised he could see the usefulness for a volunteer committee such as in doing tree counts, for research and education purposes, for interacting with TOP citizens in educating them around tree care and related issues. Mr. Marr advised that creation of such a Committee would be the responsibility of Council.

**The PTCS thus reiterates the recommendation that Council move forward with the creation of a Forestry (Tree) Committee.**

Previously the PTCS advised; On some TOP properties there exists very mature trees (likely well over a hundred years of age). We believe there should be a special category for such magnificent trees; designated say as “Heritage Trees”, or the like. These trees should receive extra high priority for preservation in any development and construction planning. **This issue has not been addressed in the revised Tree Maintenance Policy.**

The final issue for consideration relates to section **9 Tree Planting – Replacement**, and for the following guidelines as now recommended by Mr. Cook.

9.1 Two trees shall be planted for every tree removed with a diameter up to and including 400mm. The trees shall be replanted in the area of removal.

9.2 Three trees shall be planted for every tree removed with a diameter greater than 400mm and less than 900mm. The trees shall be replanted in the area of removal.

9.3 Four trees shall be planted for every tree removed with a diameter greater than 900mm. The trees shall be replanted in the area of removal.

While the PTCS believes the above is an improvement over what was previously advised by Mr. Cook, it is our position these guidelines still fall short of what the TOP should be undertaking for tree replacement. In further review of this issue which in part entailed conducting contemporary research on the science of trees and absorption of carbon, we present the following rationale as the basis for the advisements contained herein.

Mr. Uwe Brand, a PTCS member, gives the example of trees he observed on Pelham St just up the road from his house. One mature tree is dead and another is a replacement (possibly planted a year or so ago). The difference in diameter is striking, with 27 inches for the dead tree (in front of 1567 Pelham) and 1.5 inches (1573 Pelham St) for the replacement tree planted by the TOP for another tree taken down earlier. The large tree mentioned above would require the planting of:

1. 13 trees (if we divide the diameter of the dead tree (27 inches) with that of the replacement (2 inches), based on the suggestion noted in the July 17, 2021 PTCS submission to Council.

OR,

2. 3 trees following Mr. Cook's recommendation

Mr. Cook's rational is simple. We are replacing 3 for 1, which is just a number and is better than the 2 for 1 trees which he initially suggested. However, this does not reflect the actual 'value' of the trees and their carbon sequestration capacity.

If we (TOP) follow Mr. Cook's suggestion for replacement numbers, these will lead to a more Positive (Higher) carbon footprint, with time. Instead, the PTCS now suggests using a tree replacement formula not based on diameter, but one based on CO<sub>2</sub> removal by a tree.

The dead tree (as mentioned above), will according to the following parameters such as diameter, tree species, growth factor, conversion to dry weight and carbon equivalent absorb about 43 kg/year of CO<sub>2</sub> equivalent. The replacement trees as suggested by Mr. Cook would absorb between 5-10 kg/year. Thus, it would be well below the capacity of the dead tree.

Using CO<sub>2</sub> as a guide for replacement number gives us an actual replacement FACTOR of: 4.5 to 8.5 (rounded numbers) trees. Important to note; this just maintains the status quo. It does nothing about doing more to mitigate increasing CO<sub>2</sub> emissions in the TOP.

Based on the head-to-head CO<sub>2</sub> removal, a Minimum of 5 Trees should be planted to replace the dead tree mentioned above. So, instead of dividing the diameter of the dead tree by the replacement one we could suggest a divisor of "5" or some other number. Thus, a replacement number of '9' trees would be the SAME as 2 CO<sub>2</sub> equivalents for 1.

We reiterate, that all trees over 50 mm diameter should be replaced by the formula stated above to satisfy their real value in terms of; a) habitat for wildlife, b) shading, and thus increasing resilience of town infrastructure (sidewalks, roadways), c) mitigating water absorption (flood control), d) land stabilization (erosion control), e) aesthetic value of a neighbourhood, and e) absorption of carbon dioxide (and thus decreasing the carbon footprint of the town). Please see Attachment A, titled "The Benefits of Trees", for more vital information regarding the role trees play in our lives and in the life of the planet.

To conclude, we of the PTCS strongly believe these issues remain extremely important and highly pertinent ones to what the Town has laid out in the recently released Climate Change Action Plan. As the IPCC "The Physical Science Basis" report recently concluded, we humans are the major cause of climate change and it is up to US to take actions NOW to deal with this. Now more than ever, the old adage applies; "We need to think globally but act locally". NOW is our chance to start acting locally.

Thank you for your time and consideration of our report.

Respectfully submitted,

Pelham Tree Conversation Society  
Acting Chairperson – Mike Jones  
44 Emmett Ave, Fonthill, ON. L0S 1E0  
PelhamTreeConservationSociety@gmail.com

Attachment A- The Benefits of Trees