Van: McGee, Kristin <k.a.mcgee@rug.nl>
Verzonden: dinsdag 25 augustus 2020 11:14
Aan: Wolbert Meijer <wolbert.meijer@groningen.nl>
Onderwerp: Re: vraag over inspreken tijdens raadsvergadering

Geachte meneer Meijer,

Hierbij mijn twee teksten over Groenplan en APVG. Ze zijn nog in het engels en te lang maar ik zal voor morgen mijn toespraak in Nederlandse vertalen en in een veel korter versie - beide ongeveer 300 worden etc.

Met vriendelijke groet,

Kristin

Proposal for better integration between green/tree proposals of city council (Vitamine G) and their implementation by tree workers and administrators via enhanced regulations of APVG

Kristin McGee (Boomwachters Groningen)
August 24, 2020

Part 2 – Revision of APVG Criteria

Current tree assessment evaluation is anti-tree and requires revision
The current evaluation criteria of tree permit requests could be easily and categorically characterized as **anti-tree** in that they attempt to first quantify all of the possible negatives of urban trees. They appear driven by an **excessive risk assessment** over the cultivation of an overall and **sustainable well-being**. When deciding if a tree should be removed, criteria fail to quantify the essential services provided by even aging and deteriorating trees and instead highlight primarily superficial negative assessments. A new evaluation form of trees must be crafted so that trees are understood as collective objects within the urban forest and not as individual items of personal property to be disposed of at will.

An overview of tree permits since 2015 reveals that nearly every tree requested for felling receives a permit (98%). This means that large-stature trees are cut and often not replanted leading to a rapid loss of overall tree crown cover ratios. This pattern has to be radically transformed if we want to claim sustainability as our goal. Those in charge of assessing trees and approving permits should be encouraged to directly reverse their positions to preserve up to 80% of trees and allow only 20% of tree felling request. Cut quotas too have to be abolished and no longer instrumentalized into annual budgets as dependable sources for local biomass burning. In Haren, for example, virtually every tree permit request is granted, despite the health and vitality of many trees. As private trees make up more than a third of all urban trees, they are truly worth preserving. The tree permit process should better be used as a vehicle to educate residents on the true value of their “private” trees as collective entities necessary for the collective health of humans and plant life. In short, at present because of APVG tree assessment criteria and permit regulations, the majority of tree

permit requests are granted while in many places such as Ten Boer, permits are not even required. This needs to be reversed.

Required information for those requesting a tree permit:
The Boomwachters therefore requests that tree felling regulations should be standardized in all neighbourhoods and villages in Haren, Ten Boer and Groningen to require permits for trees over 20 centimetres in diameter. Second, we request that all permits contain more essential information to increase transparency and participation by local residents, especially those living nearby who also have a stake in preserving the tree. Requests for permits should include at the very least:

- The size of the tree
- The species
- The relative health (Based upon Roloff's tree crown visual assessment, 2009)
- A digital photograph for records
- Why the felling is requested
- Who has requested the tree (private, gemeente, business, SBB)

Updated Tree Assessment Criteria
Secondly, for a more comprehensive and up-to-date tree assessor evaluation, we request that the **actual values and services** of trees are measured so that a still relatively vital tree will be kept rather than cut at the first sign of aging or nuisance from maintenance. These old rules are very out of date and no longer consider the needs of a climate challenged future. Evaluation must also be done by a qualified tree assessor or arborist (and not just an ETT worker). We suggest the following as the new criteria in the assessment of the tree:

Beneficial Values Assessment

1. **Environmental evaluation**: Assess the tree's contribution to the environment (with iTree Tools or with Cobra Groen's bomenmonitor)[1]:
    a. C02 sequestration for the current year and projections for the coming 10 years
    b. Fine particulate matter collection
    c. Nitrogen collection
    d. Water filtration
    e. Cooling
2. **Health (of tree)**: Health and form of the tree (with visual assessment by expert):
    a. Projection of life-span (less than a year, 5 years, 10 or more than 15 years)
    b. Health of the crown based upon Roloff measures of assessing a tree crown
3. **Health (benefits for humans):**
    a. Benefits for humans because of tree (mental, physical, lowered crime rates, noise buffer)

[1] There are ample cities in the world which now provide assessments and inventories of the value of trees with either iTreeTools, the most well used in the world and locally, the Bomenmonitoren by Cobra Groen. These services are easily acquired within Groningen and would provide a much needed appraisal of the actual value of trees for the environment in light of climate challenges especially as trees lock up carbon, filter pollution, avoid water pollution and produce oxygen. See https://www.bomenmonitor.nl/ and https://www.itreetools.org/.

    b. Make a ratio based upon number of mature trees per block or tree crown cover ration per designated area within a certain distance surrounding that tree – if tree cover rates fall below 15% than the tree gets extra points.
4. **Biodiversity**: Value of the tree for biodiversity (name bird species and insects that use this tree). Use scientific databases of trees and their use by flora and fauna.
    a. Necessary for bats foraging or flying routes?
    b. Used by bees and other birds (name them)?
    c. Valuable for mammals (name them)?
5. **Large Tree value**: Age and size of the tree?
    a. Any tree with satisfactory health over 20 years should be rejected for a permit unless the tree is very dangerous for residents. And by its very nature a healthy tree over 20 years is a health benefit to residents and not a danger.
6. **Aesthetics**
    a. Is this tree a particularly beautiful tree for the street and neighbourhood. Is it visible from the street?
7. **Structure of the tree**: Does the tree have a good form? Has it been stripped of important inner branches or overly raised? Have large structurally essential branches been unnecessarily removed? If the tree has been ill pruned – in yearly inventories, such mismanagement should be registered and the city should be fined for destructive techniques. There need to be real incentives to implement good care and also incentives against tree damage for financial gain or simply because of inexperience.
8. **Species**
    a. Native species?
    b. Unusual species?
    c. Exceptional exemplar of species?
    d. Aggressive species which is taking over other habitat?
9. **Cultural value of the tree**
    a. Is this a beloved tree of local residents and connected to the history of the area? Have others complained when felling was announced? (letters should be required in mail boxes within two streets).
10. **Role of tree in the local urban forest**:
    a. Is this tree connected or dependent upon other nearby trees (root networks) or nature zones?
    b. Is the tree a divider between two concretized areas?
    c. Is it one of only very few trees on the property?

Evaluation criteria to assess problems with the future care and preservation of the tree
Here is a list of proposed criteria to assess the potential problems or future structural failure of a tree:

Negative Values Assessment

1. **Disease or Damage**. Existing diseases or damage includes:
    a. Fungi (which type)
    b. Bleeding cankers?
    c. Dutch Elm disease?

    d. Ash dieback?
    e. Is existing disease treatable with warming pumps, with infusion or with proper trimming of diseased limbs?
2. **Structural integrity of the tree**
    a. Is the tree structure sound or compromised? (use method of Gilmore in structural tree pruning)
    b. Have the root structures been severely damaged?
    c. Is the tree likely to fall with high wind (this can be tested by a "Static Load Testing" tension test on the trunk of the tree)? See the techniques of Dr. Paul Muir in the UK[2].
    d. Can the tree be repaired over time with proper structural pruning (and never via toping or excessive pruning of live foliage)?
3. **Tree has become too big for the area?**
    a. This is often misnamed as a reason to remove a tree. A large vital tree is the most valuable in the urban environment and there are examples all over the world of massive trees living harmoniously next to a building (see photos in attached slide show). Often tree damage to foundation or pavement is mentioned as a reason to remove a large tree. This can be tested and it should be measured with more lenient criteria as trees can grow quite well very close to buildings especially those with foundations built after 1980. A healthy tree near a building is not a reason to cut it. However, if there is no room to enter a building or use the majority of a garden, this may be considered an appropriate reason, but first all attempts should be made to persuade the owner to keep the tree. Crowns can be reduced or particular limbs removed to open up a walk way or space.
4. **Damage to property**: If the tree is damaging a house, this needs to be proven first and then measures should be taken to reduce the crown of the tree (but never topped) before a final decision to fell a tree is approved.

Reasons which should never be used to cut a tree:

1. *Too much shade*
2. *Too many falling leaves* or pine cones or flowers
3. *Allergies*. We can't remove trees because of allergies as pollens are required to allow trees to mature and grow. Also, different people have different allergies to different trees and if we accommodate everyone, we would have too few trees left. Trees need to be planted in ways that allow for diversity so that not only one species dominates. This would alleviate the impact of allergies.

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[2] See a description of this technique by the pioneering company TreeWorks: "The Static Load Test assesses tree stability by applying a known load, to simulate wind load, to the tree and measuring deflection in the stem and incline at the base. From this information we calculate the safety factors of the stem and roots of the tree during a storm. The computer program that analyses this data has been developed from decades of research into the structural properties of wood of different tree species and tests on thousands of trees. We have invested in research to support the development of this technology and our Senior Consultant, Paul Muir, is the UK's leading expert in the field of Tree Statics and Wind Load Analysis." Cited 20 august 2020, https://www.treeworks.co.uk/tree-surveys/tree-stability-assessment/

4. *Maintenance is too difficult or costly.* Let's put this in perspective, compare the annual budgets for tree maintenance with the budgets for massive infrastructure projects which will accelerate the impact of the climate crisis – from adding more heat warming concrete in infrastructure projects, to building more houses and to subsidizing intensive farming techniques which increase nitrogen oxide in the atmosphere and deplete the soil, to the air traffic and auto traffic infrastructure costs. Trees are the best technology to combat climate change and we need to properly finance them to allow them this role. The gemeente can and should provide assistance occasionally for the maintenance of valuable trees through large-stature tree maintenance subsidies.
5. *The tree is too tall.* A tall tree is not necessarily dangerous if pruned properly and maintaining a proper architecture. Smaller trees can also be deadly. This is an irrational reason to cut a tree.
6. *A tree is too big.* This has to be considering in relation to the building and street with strict rules and much levity as there are many cases in the world of monumental trees thriving right next to a building (within a few meters). In fact this is one of the core reasons to keep the tree.
7. *Cracks in the pavement.* The yearly budget should allow for repairs needed for sidewalks and roads. A cracked pavement is more valuable than a treeless area with an abundance of concrete and with all of the added costs of water filtration and flooding without trees. In short these smaller repair costs far outweigh the resulting costs of removing large-stature trees.
8. *A Branch hanging over my yard*. This branch and nearby tree needs to be understood as a massive asset to the neighbourhood and to the health of neighbours on both sides of the trees. A heavy living branch that is leaning down can be braced to ensure the health of the older tree.

In short, until we begin to make it much harder to remove a vital tree, our plan for a green future is destined to be yet one more example of green washing.

Required information published online for a tree permit:
Finally, if a tree permit is approved and announced, we request this very basic information in this permit be made openly available and published online to allow greater transparency and participation with trees in the urban forest. This information should be required:

1. **Picture** of the tree must be provided by the assessor and published online.
2. **Address**
3. **Location** of the tree on property.
4. **Reason** for approved or denied felling
5. **Size** of the tree at chest height in diameter
6. **Species**
7. **Monumental status or potential**?
8. **Requesting party/owner of permit:** members of the city council, local resident, business, SBB?

After the tree permit is approved, we request that the new APVG require that no tree shall be cut within the 6 week objection period. Currently the nature law (Natura 2000) enables trees to be cut even during this period, which often happens, and this of course totally

incapacitates the ability of local residents to fight to preserve their cherished trees. In short, this whole objection period becomes a farce, an extensive paper work exercise implemented only to enable the removal of a tree.

Emergency felling permits abused by VTH and tree cutters
Increasingly in recent years, more and more instances of emergency felling is announced. We suspect that this is abused for various reasons, such as a building needs to have a site cleared quickly or because a tree cutter desires an expedient job (and payment!). Yet the grounds for claiming an emergency felling are not listed. There should be routine testing of tree stability or exploration of other disease by a trained assessor and these should be included with the permit.

Requirements for an instable tree should require:

1. **Static load testing**
2. **Visual proof of the existence of a fatal disease**. In other words the disease needs to be revealed to have gone so far that the tree will fail within weeks. The example of the 10 trees on the Antarestraat felled early one Saturday morning in 2019 without any proof that these trees were actually instable is one example that is encountered increasingly by local residents and communicated to us. We don't think it is acceptable to make such drastic decisions without proper testing of these trees.

Trees can be tested for stability with **static load testing** such as is done by this agency in the UK (Treework Environmental Practice, https://www.treeworks.co.uk/tree-surveys/tree-stability-assessment/).

Static Load Test and Tree Stability Assessment Provides:

- An understanding of the structural stability of tree roots (previously inaccessible)
- Recommendations for retaining valuable trees thought previously to be unsafe
- Guidance on the maximum, stable height of a tree
- An understanding of the effects of 'wind load' on a tree's stability"

Static Load Testing for Tree Stability

"The Static Load Test assesses tree stability by applying a known load, to simulate wind load, to the tree and measuring deflection in the stem and incline at the base. From this information we calculate the safety factors of the stem and roots of the tree during a storm. The computer program that analyses this data has been developed from decades of research into the structural properties of wood of different tree species and tests on thousands of trees. We have invested in research to support the development of this technology and our Senior Consultant, Paul Muir, is the UK's leading expert in the field of Tree Statics and Wind Load Analysis."[3]

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[3] Cited 20 august 2020 on Treeworks website: https://www.treeworks.co.uk/tree-surveys/tree-stability-assessment/