



Building A Better Community

Bel Air-Beverly Crest Neighborhood Council
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Shilpa Gupta, Environmental Supervisor I
City of Los Angeles Public Works, Bureau of Engineering
Environmental Management Group
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Shilpa.Gupta@lacity.org

Re: Comments on Sidewalk Repair Program EIR Initial Study

Dear Ms. Gupta,

Thank you for the opportunity to comment on the Initial Study for the Sidewalk Repair Program's (Program) Environmental Impact Report.

The Bel Air-Beverly Crest Neighborhood Council represents the City of Los Angeles hillside communities stretching from Sunset Blvd. to Mulholland Drive, and from the I-405 to Laurel Canyon.

While supporting the importance of safe and accessible sidewalks for all City residents, there is increasing community concern at the environmental impacts of mass tree removals across the City as a part of the Program at a time when Los Angeles is facing ongoing challenges to its urban forest through drought, invasive pests, development, and lack of maintenance through reduced funding for the Urban Forestry Division. Further damage to our already insufficient and threatened urban forest canopy will have inevitable effects on the public health of all Angelenos, wherever they live, and send the City in the wrong direction in its efforts to address the effects of climate change and implement sustainability solutions.

We submit the following comments and recommendations:

1. Halt tree removals until EIR completed: The City should stop removing healthy street trees in its implementation of the Program until the SRP EIR is completed and alternative methods and materials to maximize tree retentions citywide have been fully considered and analyzed.

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2. If removals continue, preserve existing trees wherever possible: If the Program continues with tree removals while the EIR is in process, then, whenever possible, viable existing trees should be preserved, and their growing spaces and conditions improved, if feasible, through the introduction of sustainability features. Tree removal should be viewed as a last resort. Mass removals of entire street blocks or rows of trees for project convenience or cost savings are short-sighted and will result in long-term costs for residents and the City as a whole. Each tree should be evaluated individually, on-site, by an ISA-certified arborist/municipal specialist who also at minimum holds a Tree Risk Assessment Qualification (TRAQ).

3. Increase tree replacement ratio: There should be no net loss of canopy as a result of the Program. Trees should be replaced at a minimum ratio of 2:1. When a tree's canopy exceeds 30 feet, the replacement ratio should be 4:1.

4. Update best management practices:

a) **Remove use of root barriers from Standard Plan S-456-2:** Use of root barriers results in decreased root system stability. Root barriers are costly to install, raise the risk of tree failure, and do not reliably prevent growth of tree roots under sidewalks.

b) **Use 15-gallon trees for residential plantings:** 15-gallon trees are significantly less expensive than 24"-box-size trees, result in a healthier tree with lower establishment watering needs, and will match the size of a planted 24"-inch box tree within a few years.

c) **Update City's list of approved trees/increase species diversity:** The City's list of approved tree species for planting should be reviewed. New species that are low-water-use and will be more adaptive to warming conditions due to climate change should be added to the approved list, and higher-water-use trees should be removed.

5. Complete a Tree Inventory: The City should complete a tree inventory, which is a basic urban forest management tool the City currently lacks, and without which there is no known baseline from which to assess the Program's impacts on the urban forest. The last inventory was completed in 1991.

6. Create an Urban Forest Master Plan: The City should create an Urban Forest Master Plan, another essential urban forest management tool the City currently lacks.

7. Give timely public notice of proposed tree removals: All proposed tree removals should be notified well in advance to local residents, council district offices, and neighborhood councils, as well as to the general public via a City web page. The timeline should be sufficient to allow public participation, such as the consideration and discussion of alternatives to tree removal.

8. Disclose tree replacement locations: A frequently updated publicly accessible online tracking system and map should be available to provide data on tree replacements, specifying the locations of replacement trees, to give the public confidence that the City is meeting mitigation requirements.

9. Install sustainable features: Green infrastructure features such as curb cuts, bioswales, and larger tree wells should be integrated into reengineered sections of the City's sidewalks, to increase the overall benefits to the City of its expenditure on the Sidewalk Repair Program.

10. Increase funding to the Urban Forestry Division: The budget of UFD should be increased so that the Division's ability to continue to perform its existing work is not compromised and diminished through the use of its resources in serving aspects of the Sidewalk Repair Program.

11. Address effects on wildlife habitats and wildlife: Effects on wildlife and their habitats need to be quantified by appropriately qualified specialists, and mitigation measures identified to prevent or minimize negative impacts. For example, tree removals should not occur during nesting season.

12. Revise the Bureau of Engineering's outreach presentation: The BoE's current public outreach presentation on the SRP (and the rebate program for property owners) insufficiently addresses the extent and manner in which street trees and the City's urban forest as a whole will be impacted by the SRP. Revised public outreach materials should explain the many ways in which the City's urban forest is important, the environmental and public health impacts of tree losses, and the benefits of retaining existing street trees and ensuring the survival of newly planted replacement

trees. Alternative methods and materials that will allow the preservation of existing trees should be well-publicized to residents and business owners. Information about the availability of green infrastructure components should likewise be well-publicized.

13. Periodically assess environmental impacts until program completion: Given the length of the Program, periodic reassessments of environmental impacts should take place, along with consideration of incorporation of newly available mitigation measures, and advances in alternative sidewalk repair methods and materials.

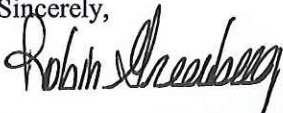
14. Monitor and ensure the survival of the replacement trees: The establishment period of a tree is generally accepted to be five years. The City has committed to a compromise 3-year watering period for SRP replacement trees. Watering after that time by property owners is not guaranteed. Survival of the replacement trees is essential to restoration of the City's tree canopy and mitigation of ecosystem impacts. Their health and survival should be monitored and ensured.

15. Quantify health effects of tree losses: The EIR should quantify the health effects on the City's residents of loss of trees and tree canopy as a result of the SRP if it continues on its present course.

16. Study alternative methods and materials for sidewalk repair: Professional specialists in sidewalk repair practices should be consulted for expert opinions and analysis of viable alternatives to tree removals, as well as advice on the implementation of added-benefit green infrastructure during sidewalk repairs and replacements. The sidewalk repair methods and materials used in environmentally progressive cities such as Portland and Seattle, which have addressed the same issues in recent years, should be reviewed to identify smart solutions and best practices. Sustainable design alternatives include such methods as meandering sidewalks, bridging over existing roots, curb bump-outs, larger tree-wells, and permeable sidewalk designs.

In conclusion: The Willits settlement provides an important opportunity for Los Angeles not only to create accessible and safe sidewalks for its residents, but to support the City's much vaunted sustainability goals by undertaking the Program in a careful, informed, and well-considered way in order to maximize its benefits and minimize its harms.

Sincerely,



Submitted by Robin Greenberg, President
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