

Holmby Westwood Property Owners Association
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Via e-mail

Shilpa Gupta, Environmental Supervisor 1
City of Los Angeles Public Works, Bureau of Engineering
Environmental Management Group
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Re: Comments on the Sidewalk Repair Program Draft Environmental Impact Report

Dear Ms. Gupta:

The comments below are written on behalf of the Holmby Westwood Green Team in response to the Sidewalk Repair Program Draft Environmental Impact Report.

The Holmby Westwood Green Team is a committee of the Holmby Westwood Property Owners Association, which represents 1100 single family homes in Westwood/Holmby Hills and was established in 1963. Members of the Green Team are committed to protecting, preserving and enhancing the street trees that were planted in our neighborhood by the Janss Investment Company in the 1920's prior to the construction of any housing.

We recognize the need to repair Los Angeles sidewalks and the mandate that the City has been given to make sidewalks more accessible to everyone over the next 30 years. However, we fail to understand the rush to implement the Sidewalk Repair Program by removing trees without due process and public involvement or consideration of various alternative sidewalk repair options.

We also do not believe that all environmental impacts of tree removal have been identified and addressed in the Draft EIR (including reduced air quality, increased heat from heat islands, and increased energy usage.) There is no explanation of how these impacts will be mitigated if the Sidewalk Repair Program removes the number of trees they have projected.

The proposed removal of trees in an expedited manner conflicts directly with the findings of the 2019 Dudek Report, which recommended increased spending on LA's urban forest, development of a comprehensive Urban Forest Management Plan and immediate completion of a city tree inventory.

Furthermore, the proposed removal of trees without due process to streamline the sidewalk repair program is contradictory to Mayor Garcetti's recent appointment of the City's first City Forest Officer, his goal of planting 90,000 new trees by 2021 and his recognition of the significant role trees must play in fighting climate change in Los Angeles.

The Environmental Impact Report calls for the removal of approximately 1300 mature trees in the coming 30 years. Under the proposed replanting model it will take 30 years to return the City's tree canopy to its current baseline level. Why should we replace the city's tree canopy, which has taken years to create with, young, 15-gallon trees that require a minimum of 3 years of consistent watering, mulching and maintenance to survive?

In light of these observations, we request the following before moving forward with the Sidewalk Repair Program:

- 1. Halt all tree removals until the City completes a full tree inventory. This will allow for a more accurate tree canopy assessment due to tree removals and a better understanding of how sidewalk repair policy and street trees policy must and can be integrated with one another.**
- 2. Study and adopt sidewalk design alternatives (including ramping and sidewalk minimization) that are currently being installed in other cities.**
- 3. Study and adopt root-pruning procedures which could be used in certain situations as an alternative to complete tree removal.**
- 4. Revise the tree replacement ratio to 4:1 to more accurately consider the existing tree age at maturity and the rate of mortality of the replacement tree**
- 5. Replacement trees should be of equal size at maturity and located in the same neighborhood as trees that were removed.**
- 6. Continue to have due process of notification through the Urban Forestry Division so that neighbors and stakeholders can comment on proposed tree removals.**
- 7. Lengthen the comment period beyond the proposed 30 days to ensure participation and consideration by all stakeholders.**
- 8. Recognize the extensive irrigation and maintenance requirements of new trees for survival, and commit to the care and maintenance of all new trees that are planted for at least 3 years.**

9. **Determine how to identify and replace any newly planted trees that fail to survive after planting.**
10. **Prioritize sidewalk repairs that do not require tree removals while the tree inventory is being completed by the city. At the same time, alternative sidewalk designs should be studied and tested. The same holds true for alternative root pruning options.**

Trees in the City Of Los Angeles must be protected and preserved to every extent possible. The Sidewalk Repair Program must find new ways of repairing sidewalks without sacrificing this vital and essential resource.

Thank you for including this input in response to the Sidewalk Repair Program Draft EIR.

Sincerely,

Marnie Bodek
Coordinator, Holmby Westwood Green Team

cc: Sandy Brown, President Holmby Westwood Property Association
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