

Communication from Public

Name: diana

Date Submitted: 11/08/2022 03:12 PM

Council File No: 22-1238

Comments for Public Posting: The coalition of organizations on the attached letter urge the Public Works Committee members to deny the project for the reasons described on the attached coalition letters. Jamie T. Hall President Laurel Canyon Association Heidi MacKay President Save Coldwater Canyon Steven Arkle President Sunshine Hill Residents Association Alan Dymond Studio City Residents Association Charley Mims President Hillside Federation & Canyon Association Casey Maddren President United Neighborhoods for Los Angeles Julie Kremkus President Nichols Canyon Neighborhood Association Jamie Hall President Laurel Canyon Land Trust Amy Gustincic President Los Feliz Improvement Association Ellen Evans President Doheny-Sunset Plaza Neighborhood Assoc.



October 13, 2022

VIA ELECTRONIC MAIL

Board of Public Works
City of Los Angeles
200 N. Spring Street, Room 361
Los Angeles, California 90012

**Re: Public Works Trust Fund No. 834 – Oak Tree Deposit Funding Relocation;
BPW-2022-0650**

Dear President Garcia and Commissioners:

Our organizations, which represent thousands of hillside residents, were informed recently of the proposal by the City of Los Angeles to use money received associated with removal of oak trees and other protected trees to plant street trees in areas that might be quite distant from where the trees were removed.

We have reviewed and endorse the letter sent from conservation groups (attached as **Exhibit A**) objecting to this use of funds. Replacements for removal of native trees and shrubs should be done in the communities where the impacts occurred, which predominantly is our hillside communities, from the hills of Northeast LA through the Santa Monica Mountains and around the edges of the San Fernando Valley.

The City has been noticeably absent from land conservation efforts undertaken over the last few decades, instead relying on State agencies, nonprofits, and individual citizens to raise funds to preserve open space and native woodlands. Here, an opportunity has presented itself for the City to participate in preservation efforts and the

City should seize it. Using these monies purchase land would be far more efficient than the proposed planting project. Staff proposes to spend \$304,743.40 just to water 154 oak trees in a time of extreme drought. Moreover, Staff proposes to spend \$288,183.28 on salaries and overtime to install and maintain these trees. Only a very small fraction of the money will actually go to purchasing the trees.

We urge the Board to deny the requested use of the funds and instead develop a well-planned and effective program that spends the money collected for losses of native trees in the areas where those trees were in fact lost.

Sincerely,

Jamie T. Hall
President
Laurel Canyon Association

Heidi MacKay
President
Save Coldwater Canyon

Steven Arkle
President
Sunshine Hill Residents Association

Alan Dymond
President
Studio City Residents Association

Charley Mims
President
Hillside Federation & Canyon Association

Casey Maddren
President
United Neighborhoods for Los Angeles

Julie Kremkus
President
Nichols Canyon Neighborhood Association

Jamie Hall
President
Laurel Canyon Land Trust

Amy Gustincic
President
Los Feliz Improvement Association

Ellen Evans
President
Doheny-Sunset Plaza Neighborhood Assoc.

Cc: Gil Cedillo
Paul Krekorian
Bob Blumenfield
Nithya Raman
Paul Koretz
Monica Rodriguez
Marqueece Harris-Dawson
Curren D. Price, Jr.
Mike Bonin
John Lee

Mitch O'Farrell
Kevin de Leon
Joe Buscaino

Exhibit A

THE
URBAN
WILDLANDS
GROUP



CALIFORNIA
NATIVE PLANT SOCIETY

Los Angeles / Santa Monica Mountains Chapter



October 12, 2022

Board of Public Works
City of Los Angeles
200 N. Spring Street, Room 361
Los Angeles, California 90012-4801

Re: Public Works Trust Fund No. 834 – Oak Tree Deposit Funding Relocation; BPW-2022-0650

Dear President Garcia and Commissioners:

The undersigned conservation organizations understand that Public Works Trust Fund No. 834 contains a significant amount of money from deposits and fees that have been collected over many years associated with the removal of protected trees. The Board of Public Works proposes to take \$666,926.68 of these funds to purchase and water “Oak Trees” that would be planted in street medians. Such action would not have the required nexus with the impacts that resulted in the collection of the deposits and fees and would be inconsistent with the intent of the Oak Tree Ordinance, as well as with the ordinance as revised (i.e., the Protected Tree Ordinance), under which the deposits and fees were collected.

The Oak Tree Ordinance originally, and the revised Protected Tree Ordinance, is designed to protect (or offset the loss of) *naturally occurring* native trees and shrubs. The ordinance expressly exempts trees that have been planted, excluding from the definition of native trees and shrubs “any tree or shrub grown or held for sale by a licensed nursery, or trees or shrubs planted or grown as a part of a planting program” (Los Angeles Municipal Code Section 46.01). As a result, the ordinance applies only in areas where any of the protected species occur naturally. The spatial nexus for using funds collected under this ordinance therefore must be limited to areas where the species in question is found to grow naturally and not include other areas.

If the City has not kept records to connect the location of impacts to the location of proposed plantings, then guidance on the historical extent of the relevant tree species can be found in studies of the historical ecology of the region (Dark et al. 2011, Longcore 2016, Ethington et al. 2020). These studies and associated online maps (e.g., bit.ly/LAPNV; see Valley and Foothill

Forests and Woodlands) indicate that the habitats associated with presence of now-protected species were associated with particular landforms, soils, and environmental conditions, and not distributed uniformly throughout the City.

Council districts are redrawn every ten years. Whatever logical geographic nexus might have existed historically, there is no reason to think that any location in a council district thirty years ago is in the same district today. Furthermore, council districts are an inappropriate geographic unit to establish a nexus with impacts under the Protected Tree Ordinance because protected trees are not distributed uniformly even within a council district. If council districts are used as a starting point to establish a nexus with impacts, the areas designated would need to be further restricted to parts of council districts where each protected species was found historically. Replacement trees should not be planted in areas where the impacts could not have occurred because the species was not naturally occurring.

Although we strongly endorse the use of native trees in places where they did not naturally occur because of their value as wildlife habitat in a highly modified urban landscape (Wood and Esaian 2020), establishing street tree plantings was not the goal of the Oak Tree Ordinance, which was targeted toward protecting existing oak woodlands and their ecological value. No matter how ecologically beneficial using native species as street trees may be, it is not as beneficial as restoring and preserving native woodlands in the areas where they were once found and are functionally connected with persisting native woodland habitats.

We therefore request that the funds accumulated in Public Works Trust Fund No. 834 not be redirected to street tree planting projects in areas for which there is no spatial nexus with either the original impact or the native range of the species to be planted. Instead, City staff should undertake a transparent process with adequate public input to plan for the use of such funds to acquire or restore native woodlands in ecologically appropriate locations consistent with the ecotope framework established in the City's 2020 Biodiversity Report (City of Los Angeles 2020).

Questions about this letter can be directed to Travis Longcore, Ph.D., Los Angeles Audubon Society, at 310-3247-9719 or travislongcore@laaudubon.org.

Sincerely,

Travis Longcore
President
Los Angeles Audubon Society

Catherine Rich
Executive Officer
The Urban Wildlands Group

Gerry Hans
President
Friends of Griffith Park

Brenda Contreras
President
Coyotl + Macehualli

Joseph Farewell
Conservation Co-Chair
California Native Plant Society Los Angeles / Santa Monica Mountains Chapter

Dan Silver
Executive Director
Endangered Habitats League

References

- City of Los Angeles. 2020. 2020 Biodiversity Report, City of Los Angeles: A Customized Biodiversity Index and Ecotopes Management Framework for the City of Los Angeles. Los Angeles Sanitation and Environment, Los Angeles, California.
- Dark, S., E. D. Stein, D. Bram, J. Osuna, J. Monteferrante, T. Longcore, R. Grossinger, and E. Beller. 2011. Historical Ecology of the Ballona Creek Watershed. Southern California Coastal Water Research Project, Technical Report No. 671, Costa Mesa, California.
- Ethington, P. J., B. MacDonald, G. Stein, W. Deverell, and T. Longcore. 2020. Historical Ecology of the Los Angeles River Watershed and Environs: Infrastructure for a Comprehensive Analysis. University of Southern California Spatial Sciences Institute, Los Angeles.
- Longcore, T. 2016. Historical Ecology of the Los Angeles River Riparian Zone in the Elysian Valley. Pages 2-1–2-29 *in* The Nature Conservancy, editor. Water Supply and Habitat Resiliency for a Future Los Angeles River: Site-Specific Natural Enhancement Opportunities Informed by River Flow and Watershed-Wide Action: Los Feliz to Taylor Yard. The Nature Conservancy, Urban Conservation Program, Los Angeles.
- Wood, E. M., and S. Esaian. 2020. The importance of street trees to urban avifauna. *Ecological Applications* **30**:e02149.

Cc: Mayor Eric Garcetti
Los Angeles City Council

Communication from Public

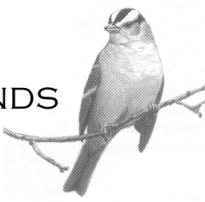
Name:

Date Submitted: 11/08/2022 03:15 PM

Council File No: 22-1238

Comments for Public Posting: The coalition of organizations, Los Angeles Audubon Society, The Urban Wildlands Group, California Native Plant Society, Coyotl + Macehualli, Friends of Griffith Park, and Endangered Habitat League, urge the Committee to deny the project and, instead, instruct staff to undertake a transparent process with adequate public input to plan for the use of the funds to acquire or restore oak woodlands by planting oaks in ecologically appropriate locations consistent with the ecotope framework established in the City's 2020 Biodiversity Report (City of Los Angeles 2020) for the reasons spelled out in the attached letter that was sent to the Board of Public Works on October 12 and as summarized as follows: 1. There has been zero notice to neighborhood councils/stakeholders (staff asserts that meeting for 9 months behind closed doors with City staff is public outreach). 2. Money collected under the Oak Ordinance applies only in areas where the protected oak species occur naturally. Obviously, oak trees and oak woodlands do not naturally grow in street medians. You don't mitigate the loss of oak woodland by planting trees in a median. The nexus for using funds collected under this ordinance therefore should be limited to areas where the oaks are found to grow naturally and not include other areas. 3. Only a very small fraction of the money will actually go to purchasing and planting the trees. The majority of the money goes to staff salaries, not trees.

THE
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