



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

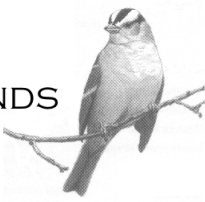
Ellen Evans  
President  
Doheny-Sunset Plaza Neighborhood Assoc.

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](https://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](mailto: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