

To: Rachel Malarich, City Forest Officer Rachel.Malarich@lacity.org
Subject: Important Comment on Proposed Tree List

I (or neighborhood council), strongly oppose the methodology that generated the street tree list presented as a draft by the City Forest Officer. Given the state of our soon-to-be desperate need for protection from heat, the starting point should be to set goals to serve that end and sustain the health of the City's population. It would be unwise to ignore this opportunity given the City's increasing density due to development and adding ADUs, that result in cutting down private property trees and reducing canopy. Before allowing our street tree wells to be filled with trees that may not adequately serve the health of the community, it is critical to determine and quantify our needs, and then determine what trees meet the needs of our residents. Based on the trees that thrive here, the list needs to reflect those needs. This approach may mean hardscape adjustments and infrastructure changes combined with funding. Cit Council indicated last month that right now the State has large sums of biodiversity money available for cities – this could fund a better tree planting program that promotes biodiversity – have we asked our officials to access it for that purpose?

The guiding principle of “right tree, right place” is an environmentally impoverished approach that is a recipe for defeat because it assumes the environment for street trees can't get any better. It is a list tailored to the worst conditions: poor soil, no mulch, no water, substandard-sized tree wells, and neglect. And the proposed list mostly dismisses trees that would fulfill the biodiversity directive to all City departments, recently adopted by the City Council. By starting with our inadequate streetscape it becomes a design for a city that does not sufficiently care about trees and has no impetus or WILL to make the situation better. Yes, there is cost involved, but is it not better to spend it before lives are lost?

The US Forest Service Urban Forest Connections September webinar **Tree Planting, Inventory and Analysis for Human and Environmental Health** presented a scientific study of deaths from heat that could have been mitigated by cooling provided by trees. Scientists are telling us that trees can save lives.

Yes, we are in a drought, but water need is not a viable excuse for a limited tree list. The cost to water a tree for an entire year is under \$5, according to the Los Angeles CAO, reported at the Community Forest Advisory Committee. Yet the residents have not been informed of this and routinely are converting yards into parking lots and illegally removing street trees. Outdoor watering is only 9% of the State's water usage, and mulch is an easy way to conserve watering. (9%The California Drought and Landscape Water Use
[https://cityofsanmateo.org/DocumentCenter/View/46902/Hodel_Drought_Landscape_Water_Use?bidId=\)](https://cityofsanmateo.org/DocumentCenter/View/46902/Hodel_Drought_Landscape_Water_Use?bidId=))

This proposed street tree list that has been compiled for comment actually downsizes our urban forest and misses a big opportunity to shade our streets, thus defeating Los Angeles as a walkable city in a hotter future. Missing from this list are

some of our largest street tree species that can grow to 100 feet and mitigate heat island effect. And also missing from the list are important native species that we need to encourage at every opportunity because these trees provide habitat to our declining bird and wildlife population, shown by ecologists to contribute to the health of the human residents.

Every year hundreds of tree removal requests are granted for these reasons:

1. driveway relocation
2. sidewalk repair
3. DWP or BOE requirements
4. protruding into the right of way
5. determined to be in the way of a developer's construction or staging
6. special projects (public transit, airport people mover, space shuttle delivery)
7. in the path of automatic street widening when a property is improved (a concept from a bygone era that promotes more room for cars and needs to be overturned)

Additionally Urban Forestry removes street trees declared an emergency hazard or dead. Plus many street trees are removed illegally and without replanting.

The street tree inventory revealed a surprising number of empty tree wells. These all once held trees! Using Google Maps to view a site historically, it is often possible to see the tree that once was there. And Google Earth shows the overall loss of trees and canopy over the years.

Now the new question arises of whether we are also downsizing our shade canopy by not planting many species of tall, large canopy trees. If we adopt this list, there will never be another eucalyptus, liquidambar, carrotwood, sycamore, London plane, or Southern magnolia planted as a street tree. Plus many others we see and can't even identify. Sadly, RAP and developers will likely follow suit and also not plant these trees. Lists have a way of becoming bibles and circulated outside the intended purview. Nurseries may stop stocking them. All trees have some nuisance factors, but the trade-off to residents is the ecosystem services they provide.

Why were big street trees planted in Los Angeles in the first place? Most were planted by developers years ago to create shade for the homebuyer. Less air conditioning needed. On a hot day there can be a 30 degree Fahrenheit difference going from a shaded to an unshaded sidewalk. Tree advocates took these measurements as part of a successful fight to retain two blocks of canopy ficus trees on Cherokee Avenue in Hollywood. But it took community outcry and public shaming in the press to get the City to find a way for these trees to stay. The sidewalk was actually repaired at the site in a way to accommodate the big trees.

Since that success story there have not been any other significant efforts by the City to find creative ways to make the hardscape fit the trees. Why don't we create friendlier spaces for street trees? We spend taxpayer money on bike lanes, so why do we not spend money on adjusting the hardscape to create shade for those who

utilize our sidewalks? Otherwise, if it is too hot to walk to a transit stop, the decision will be to use a vehicle to get to a destination.

Other cities design their rights of way to accommodate big trees that create shade for the pedestrian. A journalist writing a book on shade in the USA recently told our Neighborhood Council Sustainability Representative that, unlike other cities, he observes no WILL to create or retain tree shade in Los Angeles. It is a city that so far refuses to spend money to increase the space for street trees and adequately fulfill the care needs of those trees. He wonders why huge ficus trees don't lift the sidewalk elsewhere. We see magnificently huge ficus trees on Magnolia in Burbank that have not had crown reduction and stand very strong over many years – can we find out their secret? The wells are not huge and the trees have had no effect on the sidewalk. Did they do something special when these trees were planted? What in their continued maintenance could our Urban Forestry learn so we can have the benefit of this species too? We must be willing to learn from the successes of other cities. We really need these big shade trees. Los Angeles has come up with a list of trees that will survive the worst circumstances. This approach lacks the understanding that street trees are the shade of our community and it is the responsibility of Urban Forestry to provide it. It has to be so much more than just which trees will grow to maturity in the worst tree wells or planting beds.

A year-long publically-funded working group of City officials, tree department heads, and tree experts gave Los Angeles a current tree sustainability score of 2 with a goal of 109 -- this gap of 107 is HUGE compared to other cities! They included this data in their 2018 Dudek Report (First Step Developing an Urban Forest Management Plan for the City of Los Angeles p. 25).

LASANS produced the City of Los Angeles 2020 Biodiversity Report. Los Angeles is a biodiversity hotspot, which means the City needs to pay attention to preserving its flora and fauna, or its biodiversity will be lost. Our native trees are crucial to this end. Yet the **Southern California black walnut, the California bay, and the California sycamore** did not make the street tree list. No more of these important trees ever to be planted on our rights of way despite the fact that the Southern California black walnut ONLY grows in the Los Angeles area, and thousands are currently street trees. If there are issues in planting and cultivating these natives, why not research and educate our workforce to grow these trees? There is always more to learn.

Some of our park areas have recently been given over by the City to tiny homes and stormwater capture projects, so there is less room for trees. In fact these projects have needed to remove trees. Developers are building up to property lines and property owners are adding multiple ADUs in their yards -- so less room for tree canopy. Currently rampant is an illegal practice of turning front yards into parking lots at the expense of trees and plants. Developments in open spaces and also oversized homes cause tree removals from our hillsides and remove sensitive natural communities of plants and wildlife.

Planting street trees is a way to create some respite from the future heat island effect. It takes years before a tree produces appreciable shade. We need to have VISION, GOALS and a PLAN. Beverly Hills has a 40% canopy and Los Angeles has a 19% average canopy. Our city's goal should be a 40% canopy by 2040. To reach it, we must refocus our efforts and make a plan to create an environment for big trees. We need more continuous parkways, sidewalks that can handle larger tree well areas, and set-backs for trees to be required of new buildings. The biggest trees as well as our important native trees must become priorities for planting on our list of the trees. We need to CREATE and FUND the right place for the trees we deserve. We support a proactive rather than a defensive approach. Providing shade is an act of environmental justice. Los Angeles cannot become "No City for Big Trees".

For comparison, here are two sections of the criteria Palo Alto is utilizing in creating its tree planting list:

Habitat value and attractiveness for birds, butterflies and pollinators. • Opportunities to create riparian habitat. • Ecological benefits such as shelter, food, and breeding sites for both resident and migratory birds and pollinators. • Energy use reduction potential. • Carbon sequestration potential. • Stormwater treatment potential. • City goals for conserving potable water. • City goals for recycled water. • Infrastructure conflicts. • Maintenance issues. • Aesthetics. • City's goal of 50% shading goals for rights-of-way, parking lots, and heat islands. • City's goal to emphasize native species. • Need for age diversity. • Toxicity to birds. • Potential to become invasive. • Potential to provide healthy, local food to residents. Notes: • The resulting list should be searchable by attributes. • Special consideration should be given to the golf course. • A comprehensive conservation plan is needed to address the complexity of the ecosystems of preserves, and open spaces recognizing that the desirability of traits is often contingent upon location or limited rooting area i.e., problems on one site may be benefits on another.

Upon completing the "Preferred and Restricted Species List", work with Canopy to encourage local and regional nurseries and garden centers to defer to stock the "preferred" species—with emphasis on increasing the availability of species that are drought-tolerant as well as tolerant to recycled water—and to avoid stocking invasive species.

Their full plan is available here:

<https://www.cityofpaloalto.org/files/assets/public/public-works/tree-section/ufmp/attach-a-gpp-revised-2nd-ed-4-council-in-fall-of-2018-reduced-2-25-19.pdf>

The proposed draft street tree list should be called the Temporary Street Tree List, and the trees mentioned in this letter should be added and minimally these invasive species removed:

'Candida' White Orchid Tree

Purple Orchid Tree

Camphor Tree

Cajeput Tree

The list should only be used for the upcoming planting season, and it should be guided by more species diversity at planting sites, avoiding the monoculture planting that has been the UFD go-to. The emphasis should be on planting native and large canopy trees, and nurseries should be notified of this, or other nurseries located who will carry the important trees. State biodiversity funding should be applied for and used for planting native trees. And above all a new methodology

should be adopted of assessing environmental goals that inform tree selection and adjusting the new tree list and how it is utilized to fulfill the health needs of the community. How the list is implemented has to be part of the plan – which trees work where and what needs have to be met in given circumstances. And maintenance needs to be adjusted for the species. Let's make sure workers understand the needs of a given tree.

We really can't wait five years for the Urban Forest Management Plan (UFMP) because too much will be lost. We must act NOW as though we have a plan, identify our goals and begin to improve our environment. Everything we do will ultimately inform the UFMP, which will be much better because we will already be changing our practices to promote the most shade, carbon sequestration, and biodiversity. Let's immediately adopt the magic of thinking big. Shall our goal be a 40% canopy by 2040? Let's engage and educate the public now to join with us to care for the street trees. Let's go after what resources we need and advance rather than settle. The poverty of limitation leads us to adapt the street tree list to the challenged state of our streetscape. By next year, let's set a high standard for canopy and biodiversity achievement and then create the planting list and plan that advances the goal. Then we will know we are getting it right.

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