

Safe Sidewalks LA: Sidewalk Repair Program

The City of Los Angeles has launched a program to repair our broken sidewalks. As part of a settlement of the Willits class action lawsuit, a sidewalk repair program (SRP) called Safe Sidewalks LA began 3 years ago, and as a result, hundreds of large trees have already been removed, even though an environmental impact report (EIR) had not been conducted. We all want our sidewalks repaired, but we cannot afford to lose our urban tree canopy.

Through this 30-year SRP program, close to 13,000 large, mature trees are projected to be removed. According to Urban Forestry Division replacement is not guaranteed in the same location and smaller species will be planted. Yet it is the large trees that provide greater ecosystem services than smaller trees, and it is these valuable species that are frequent candidates for removal.

On December 26, 2019, the Sidewalk Repair Program Draft EIR was finally released. Here is a link: <https://sidewalks.lacity.org/environmental-impact-report>. The NCSA Trees Committee has serious concerns that, with respect to trees, this lengthy report is not informed by science. In fact it not only does not address all of the ecosystem services provided by trees, but it totally ignores the City's own 2018 Dudek report, which cites tree preservation as critical for the health of our city and its inhabitants: https://www.cityplants.org/wp-content/uploads/2019/07/10939_LA-City-Plants_FirstStep_Report_FINAL_updt_7-2019.pdf (Page 46 of the report discusses SRP issues.)

The goal of this draft EIR is to “streamline” the implementation of the sidewalk repair program and enable trees to be removed without challenge. We have concerns about the rush to remove trees without adequate due process, public involvement, and consideration of more sustainable approaches. We know there are hardscape alternatives to tree removals, such as bulb outs, that are utilized in other cities to divert the sidewalk around the tree in order to retain it, that are not proposed for Los Angeles. But no funding exists for hardscape alternatives. Funds are only there for removals despite the fact that the Los Angeles Chief Administrative Office has determined that the more expensive approach is for the City to remove a tree.

Although new young trees will be planted, the projected return to the tree canopy baseline as it existed prior to the program will not occur for 30 years. It has no problem with canopy decline in years 1 through 29 of the Sidewalk Repair Program. The report ignores or fails to evaluate numerous health and environmental impacts that result from tree removals. These include an increased heat island effect, a decline in air quality, loss of wildlife, and loss of stormwater capture. No mitigation of ecosystem services loss is addressed in this EIR because trees are considered a design element rather than an ecosystem service provider.

Trees take decades to grow to maturity, and the report anticipates a new tree mortality rate of only 8%, which we believe is overly optimistic, particularly given that budget and capacity constraints may make proper maintenance and irrigation of young trees extremely challenging. The City of Santa Monica's chief forester reported at the City of Los Angeles's 2019 Tree Summit that in Santa Monica they experience 20% mortality with street tree saplings -- and their urban forestry program is highly regarded. UFD will plant 15-gallon saplings with only 3 years of watering and no plan to replace any trees that fail after 3 years. UFD has issues with lack of watering crews, and new trees may not make it.

It is CRITICAL that as many NEIGHBORHOOD COUNCILS and also INDIVIDUALS EMAIL COMMENTS TO:

Shilpa.Gupta@lacity.org

Subject: Comments on the Sidewalk Repair Program Draft Environmental Impact Report

Most of the 1800 page DEIR deals with the environmental insignificance of taking out and putting in the sidewalk hardscape. Very little of it deals with trees and it is mostly in the Appendices.

Please write what you think is wrong with the DEIR and you may use the first page for ideas. Ask questions that they will have to address.

Suggestions you may use:

Why is due process for tree removals being abandoned? We oppose any streamlining that removes adequate time to consider every alternative to tree removals – given the value of trees, seven days is not enough time for thoughtful approaches. A sixty-day period that includes the public and Board of Public Works hearings for three or more trees at a given site is needed to make sure that removal is the only option.

Why is the Sidewalk Repair Program Draft Environmental Impact Report (EIR) proposing to allow the tree canopy to decrease over 1.5% during 30 years by removing 12,869 large trees, only reaching 2017 levels again in 2047? 29 years of loss is counter to any strategy of sustainability.

Given that trees provide more than canopy, why are not other ecosystem services addressed in this DEIR? Where are the scientific projections for these losses? There is likely a violation of California Environmental law.

Trees are an essential first line of defense against extreme heat days, which will become more frequent during the next 30 years and localized tree loss will result in a dangerous increase in local temperatures, especially on extreme heat days. Where is the mitigation for this?

Since the EIR proposes to replant for tree loss at different ratios during different years of the project, how do they justify planting the minimum number of trees necessary to return to 2017 levels in 2047? Why would there not be planting 4:1? Why are there not provisions to plant larger species trees and enlarge tree wells toward the street in areas that can sustain this?

Why is City's Dudek Report that warns of the potential environmental losses from the SRP being ignored?

Where are the tree preservation efforts utilized in other cities? We want offers to property owners for easy variances and even incentives for meandering sidewalks. We want funding to design and build bulb outs for streets where parking is not an issue?

Loss of tree canopy also means reduced air quality, loss of habitat, loss of stormwater filtration, and loss of aesthetics and property values. We want scientific study of ecosystem services provided by trees proposed for removal and binding mitigation for these environmental losses.