



## PACIFIC PALISADES COMMUNITY COUNCIL

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February 17, 2020

Via e-mail

Shilpa Gupta, Environmental Supervisor I  
City of Los Angeles Public Works, Bureau of Engineering  
Environmental Management Group  
1149 S Broadway, Suite 600, Mail Stop 939  
Los Angeles, CA 90015  
[Shilpa.Gupta@lacity.org](mailto:Shilpa.Gupta@lacity.org)

**Re: Public Comments on the Sidewalk Repair Program Draft Environmental Impact Report**

Dear Ms. Gupta,

The City of Los Angeles (City) prepared a Draft Environmental Impact Report (EIR) to evaluate the potential environmental effects of the proposed Sidewalk Repair Program (SRP). The City is requesting input on the Draft EIR from public agencies, residents, and other interested project stakeholders

Pacific Palisades Community Council (PPCC) has been the most broad-based organization and voice of the Palisades community since 1973.

In Spring 2019, PPCC formed the Palisades Forestry Committee (PFC), consisting of landscape professionals, community organizations, tree advocates and local government officials (including advisors UFD Superintendent Stephen Du Prey and CD11 Palisades-Brentwood Deputy Lisa Cahill), with the goal of facilitating the preservation and enhancement of our urban forest and its canopy by working in conjunction with the Urban Forestry Division of StreetsLA (UFD).

The PPCC Board and PFC members recognize that trees are a critical part of the City's infrastructure, and vital to our health. Based on the PFC's recommendation, after discussion at the regularly scheduled public Board Meeting on February 13, the PPCC Board voted unanimously to request:

1) a minimum 60-day extension in the public comment period as it is not possible for the working public to read, adequately analyze, and prepare meaningful comments given:

- The Bureau of Engineering (BOE) spent three years preparing the Draft EIR
- The EIR comprises more than 1,680 pages
- Hard copies are not available to the public (public libraries have only one copy that cannot be borrowed)
- The 60 days comment period began during the holidays without advance notice
- Neighborhood and Community Councils hold, for the most part, monthly meetings and topics must be agendaized and agendas posted in advance
- The public meetings are only beginning on January 29, 2020


2) that the Sidewalk Repair Program Draft EIR address the following:

- There shall be no net canopy loss throughout the duration of the program.

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- Alternative sidewalk designs as are currently being installed in other cities (bridging, bulb outs, meandering, narrowing, flexible joints, etc.), must be adopted.
  - The longest-lived, largest-growing, and lowest-maintenance tree species must be replaced with species of equal size at maturity.
  - Tree removals require due process. While the current policy of 30 days notice isn't sufficient, the SRP shall not exacerbate it by expediting administration of removals.
  - Public input from neighbors and other stakeholders shall be sought and encouraged, not reduced.
  - Program strategy needs to include the recommendations of the 2018 Dudek First Steps report.
  - Program should prioritize sidewalk repairs that do not require tree removals while newly planted saplings grow.
  - Should clarify that Historic Cultural Monument trees would be protected.
  - Care and irrigation of new young trees shall be expanded beyond 3 years.
  - SRP shall evaluate shading around key areas for pedestrian movement and walkability and impacts on traffic calming.
  - Ecological impacts of climate change and the relationship with urban ecosystems, including resilience (ability to recover from stress/impacts), resistance (ability to withstand stress/impacts), and responsiveness (ability to adapt and change in response to stress/impacts) shall be considered.
  - Tree inspectors shall have expertise and training in nesting birds and tree cavities.

Thank you for the opportunity to comment on this matter and for including this input as necessary information that needs to be evaluated and included in the Sidewalk Repair Program Draft EIR.

Sincerely,



David Card  
Chair, Pacific Palisades Community Council

cc: Stephen Du Prey, Superintendent, Urban Forestry Division, StreetsLA  
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Lisa Cahill, Palisades-Brentwood Deputy, CD11  
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