

PFC Submission of Information to PPCC relating to a Proposed Draft Letter regarding: Public Comments on the Sidewalk Repair Program Draft Environmental Impact Report

On January 28, 2020, Lisa Cahill alerted David Card and Chris Spitz about the release of the Sidewalk Repair Program Draft Environmental Impact Report released on December 26, 2020, in the event the PPCC and/or the PFC wished to take any actions to help the City navigate this highly impactful 30 year program.

Applicable information may be found at:

Safe Sidewalks LA including Upcoming Public Meeting Dates may be found at:
<https://safesidewalks.lacity.org/>

The Draft Environment Impact Report may be found at:
<https://sidewalks.lacity.org/environmental-impact-report>

The Neighborhood Council Sustainability Alliance Tree Committee (NCSA) info (including their recommended Motion for consideration by councils) is at:
https://www.ncsa.la/safe_sidewalks_la_sidewalk_repair_program

Background of the Community Forest Advisory Committee (CFAC) who advised the required detail (provided by Lisa Cahill) included in the PPCC/PFC proposed letter is found at:
<https://dpw.lacity.org/community-forest-advisory-committee>

Bel Air-Beverly Crest Neighborhood Council (BABCNC) Motion on this subject may be seen on their Agenda item #24 at: <https://www.babcnc.org/docs/34485640-9642.pdf>

Example/reference of coordinated Sidewalk Repair/Urban Canopy Protection Operations (in Seattle, WA): http://www.seattle.gov/Documents/Departments/SDOT/Trees/TreeSidewalksOperationsPlan_final215.pdf

Existing and recent Dudek Report on First Steps: Urban Forest Management Plan for the City of Los Angeles:
https://www.cityplants.org/wp-content/uploads/2018/12/10939_LA-City-Plants_FirstStep_Report_FINAL_rev12-7-18.pdf

The purpose of Proposed Sidewalk Repair Program:

- Continue & expand implementation of Safe Sidewalks LA.
- The proposed Sidewalk Repair Program would repair & upgrade sidewalks and curb ramps in the City of LA.
- Street tree removals and replacements, along with utility relocations, may be needed.
- The City may adopt policies and/or ordinances to assist in the efficient administration of the proposed Sidewalk Repair Program and its objectives.
- The Draft Environmental Impact Report (Draft EIR) is prepared to analyze and disclose the potential environmental impacts as a result of the proposed Sidewalk Repair Program.
- Comments can be made during the 60-day Public Review Period December 26, 2019 to February 24, 2020.
- Comments can be made via the program website (<http://sidewalks.lacity.commentinput.com/>), email, mail or at any of the 7 public meetings held during the Public Review Period.

The PFC has considered the information and recommends PPCC send the attached letter as part of public comment due to:

- The significant issues not addressed in the Draft EIR which would have a significant adverse affect on the urban forest in LA:
 - the Sidewalk Repair Environmental Impact Report (EIR) proposes to allow tree canopy to decrease over 1.5% during 30 years, only reaching 2017 levels again in 2047, and

- the EIR proposes to mitigate tree loss at different ratios during different years of the project in a cynical ploy to only plant the minimum number of trees necessary to return to 2017 levels in 2047 to claim the project will have no impacts, and
- the tree canopy is 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,
- The commitment that the PPCC made to enhance and sustain the health and beauty of the Pacific Palisades urban forest for future generations by facilitating the planting of appropriate trees and the caring for our existing trees per the “Resolution re: Street Tree Selections & Urban Forestry” which was presented and adopted at the October 24, 2019 PPCC meeting including:
 - protect the urban forest from unnecessary removals by better management, planning and enforcement, and honor the history of trees in the community; and
 - maximize the number of urban forest trees and their canopy by facilitating the planting of more trees, and to minimize the number of trees that are removed; and
 - facilitate the preservation, enhancement, and best practices management of the Pacific Palisades community’s urban forest; and
 - develop an urban forestry policy that increases the age and species diversity in the public tree population, augments biomass and canopy coverage community wide, enhances the character and aesthetics of our neighborhoods, and achieves exemplary stewardship of the forest for all who live and work here.

ATTACHMENT (Recommended Letter)

February __, 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

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
- Public participation is an essential part of the CEQA process.

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

- There shall be no net canopy loss throughout the duration of the program.
- 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
stephenduprey@lacity.org

Lisa Cahill, Palisades-Brentwood Deputy, CD11
lisa.cahill@lacity.org