



# Laurel Canyon Association

*A Community Organization Dedicated to Improving and Preserving  
the Quality of Life in Laurel Canyon*

February 18, 2014

**VIA ELECTRONIC MAIL**

Councilmember Joe Buscaino  
Councilmember Gilbert Cedillo  
Councilmember Curren D. Price, Jr.  
Public Works & Gang Reduction Committee  
City of Los Angeles  
200 N. Spring St.  
Los Angeles, CA 90012

**Re: Council File Number 14-0019 - Street Tree Guidelines and  
Policies**

Dear Chair Buscaino and Committee Members:

I am writing to express Laurel Canyon Association's ("LCA") support of the motion initiated by Councilmember Mike Bonin. The motion states that members of the westside community have experienced improper pruning procedures. LCA would like to note that we were faced with a similar experience over a year ago as part of the City's Tree Canopy Removal Program ("Program") overseen and supervised by the Los Angeles Fire Department ("LAFD").

Laurel Canyon's heritage tree population was greatly impacted by the Program when numerous trees (including large, native oaks) were either entirely removed or significantly cut back in a manner that threatened their survival. As you can imagine, the work was controversial and many residents were upset. While it is too late to undo the damage done to our community, LCA supports the efforts of Councilman Bonin and City Council to conform the City's Program to established City policies and guidelines that will ensure healthy tree life.

***board@laurelcanyon.org  
www.LaurelCanyon.org***

Please don't hesitate to contact LCA if you have any questions or comments. Our organization may be reached at [board@laurelcanyon.org](mailto:board@laurelcanyon.org).

Sincerely,

*Cassandra Barrère*

Cassandra Barrère

On Behalf of the Board of the Laurel Canyon Association

CC:

Councilmember Mike Bonin

David Graham-Caso

About Laurel Canyon Association

*LCA is a neighborhood association serving the area of the Hollywood Hills known as "Laurel Canyon," one the most beautiful and environmentally important areas of Los Angeles. The hills in Laurel Canyon provide a scenic backdrop for the rest of Los Angeles. Further Laurel Canyon's forested valleys and chaparral-draped hillsides offer habit for native wildlife. Laurel Canyon also is home to a watershed and greenbelt for the vastly developed plains of Los Angeles and the San Fernando Valley.*

*LCA was founded for the express purpose of preserving and improving the quality of life in Laurel Canyon. The goal of our community group is to promote the welfare of the residents of Laurel Canyon and to maintain the quality of life in the Hollywood Hills, by preserving its residential character, its quiet, privacy, natural beauty and safety. Moreover, LCA endeavors to encourage cooperation among all residents and to educate appropriate governmental bodies concerning changes in existing or proposed laws affecting Laurel Canyon or in anything that affects the local community.*

*LCA's jurisdiction includes Laurel Canyon Boulevard, its feeder streets and the Kirkwood, Stanley Hills, Lookout Mountain and Wonderland areas. The neighborhood is bounded on the north by Mulholland Boulevard and at the south by Hollywood Boulevard. The main streets are Laurel Canyon Boulevard, Mulholland Drive, Wonderland Avenue, Lookout Mountain Avenue, Kirkwood, and Stanley Hills. LCA is a residential stakeholder with membership in the Los Angeles Neighborhood Council system, specifically, the Bel-Air Beverly Crest Neighborhood Council ("BABCNC").*



February 18, 2014

1.805.225.4766 • INFO@CLAWONLINE.ORG • PO BOX 50000 • STUDIO CITY CA. 91614

Councilmember Mike Bonin  
**VIA Email**

Re: Tree Trimming Policy (Council File 14-0019)

To Honorable Councilmember Mike Bonin,

Citizens for Los Angeles Wildlife, Inc. is a public benefit non-profit advocacy organization whose mission is to promote educate and protect the fundamental importance of wildlife, wildlife corridors and wildlife habitats everywhere. Our wildlife health is an important barometer of our larger environment. That is why we applaud your motion to explore tree trimming policies in the City of Los Angeles. We believe you are already well aware and educated about the environmental need and benefit from our city's trees and forests – a vast network of winged habitat linkages - our wildlife corridors of the sky.

**Protect the Nest** - Our flying wildlife, particularly raptors (eg. owls and hawks,) need healthy mature trees to survive. Tree-trimming during nesting season needs to be examined and prohibited in most cases. Caution needs to be exercised year round. Even empty nests are vital sanctuaries for migratory birds and even for other wildlife. The entire tree, not just the nest, is wildlife habitat for many bird species alike.

**Enforcement Element** - We are no stranger to the fact that Urban Forestry is understaffed and are saddened by how good policies on paper do not get complied with or enforced. Zoning documents with mitigations and bonding requirements are routinely ignored. That is why we are so encouraged by your request to the City Attorney for recommendations that create actual deterrence by way of monetary fines. This could be a welcomed opening for Administrative Code Enforcement (ACE) policy.

**A Policy for All** - While our city has established Street Trees Policies in 1993 and launched the Million Tree campaign, one need to only look at satellite maps taken over this same time period to see that we are in a decline when it comes to healthy trees and homes for our wildlife. This is a direct correlation to the Mansionization boom in the same time period. Hat-racking, topping, heading, improper tree trimming and removal is not just occurring at the hands of citizens, businesses and their contractors, there is regular improper trimming to accommodate power lines by DWP vendors. Similarly, only two weeks ago, an LAFD program removed tall ancient trees from our city's mountains without protected tree permits and Urban Forestry Policy. So, while we update and examine what tree health and maintenance policy looks like for citizens, businesses and their contractors, let's create more than just guidelines for some, let's be sure to create sustainable urban forestry policy for all -- let no person or division or department within our city be immune from sustainable urban forestry practices.

Whether the city council committee chooses the Audubon standard or others, we hope our councilmembers will consult top biologists and arborists in consideration of the wildlife and their habitats when setting these public policies for the trees. The city's focus on growth needs to always include permanent protections for our environmental heritage that can be measured by the well-being of our wildlife and their habitats.

Sincerely,

*Citizens for Los Angeles Wildlife (CLAW) is a non-profit public benefit corporation. The purpose of CLAW is to act as an advocacy group to protect and restore the dwindling natural environments and open spaces of Los Angeles wildlife. CLAW's mission is to promote, educate and protect the fundamental importance of wildlife, wildlife habitats and wildlife corridors everywhere.*



Alison Simard, Chairman of the Board

CC:

Councilmember Joe Buscaino

Councilmember Herb J. Wesson, Jr

Councilmember Gilberto Cedillo

David Graham-Caso

February 18, 2014

LA City Councilman Mike Bonin  
City Hall  
200 N. Spring Hall, Room 475  
Los Angeles, CA 90012

Re: Council File #14-0019 – Street Tree Policies and Guidelines

Dear Mr. Bonin;

Thank you again for your proposed consideration of comments to review guidelines in the City's trimming of parkway trees. In advance of the upcoming committee review, I would like to add comments for formal inclusion in the file referenced above.

Los Angeles is like a great many large, urban, continuously growing cities in the United States. Our City manages to provide a solid platform for an incredibly diverse, highly mobile, consumption oriented population.

What makes us truly different is that a great part of the world knows who we are – and actually watches what we do here. It puts a unique pressure on our citizens and our governing bodies to do more -- not only for ourselves, in a given moment – but for the profile and life of the City to come.

Habitat; a word overused perhaps in many instances – but not here. It's not just about the trees, it's about quality of life. In this instance, the trees and what they do for us – shade our streets, beautify our homes, clean our air – is a part of our future, one that is actually under our control. This is a City that undergoes change and is flexible enough to grow with the times; we must now change the way we think about habitat if we are to protect the future of the City. For these trees are living habitats – they also provide critical sites for feeding, hunting, breeding and protection of countless species, some of them endangered and some of them under protected status. Species diversity is an accepted benchmark for a healthy environment. It is also the canary in the mine; when a city makes choices that drive populations in the direction of a decrease in species diversity, that city may be in trouble for its human inhabitants as well.

Others have commented on the importance of providing stable breeding areas, in the form of tall, mature trees with good canopy and foliage for raptors that are increasingly losing environment outside of the city of Los Angeles due to incursion and destruction. The simple fact is that urban centers and the urban forests may eventually provide the *only* way for these birds, and other birds to maintain stable populations. There are too many of us. We are growing and we are decimating the breeding stocks through habitat destruction in wild areas all around the city. Here is food, water, a new kind of life – perhaps the only one left for many of our birds.

Here is habitat.

It is time to re-evaluate the meaning of this word; it is time to create guidelines that are in line with the situation we face now and in coming years. Other cities are doing this. Pasadena is actively involved in preserving its mature, tall trees for *canopy* – they have fewer cars, fewer people, yet are already gaining ground on an 85% canopy coverage for city streets,

parks, and residential spaces. One can only imagine if we could do the same – imagine the increase in cooling shade, the clearing of air, the increase in vital habitat for birds that simply have nowhere else to go. If the Pasadena canopy coverage could be mirrored here, it is possible we might be able to change the microclimate of the basin in a remarkable way.

Importantly, the Pasadena Forestry Division will not trim or prune any tree if there is *any nest* in the tree, regardless of its activity – it is the policy of the Forestry Division to skip the tree entirely.

To reflect the growing need to protect and preserve, I propose a change in the language of the guidelines currently used by the City – in *all* its departments. I propose that the Audubon Guidelines on tree preservation be accepted, and that text to address *sensitive habitat* be added to broaden and strengthen the Audubon Guidelines. I propose that in the Guidelines for tree maintenance, the City acknowledge that the presence of nests is only the *first* evidence used to determine whether that tree is being used for breeding. I propose that language be added that any evidence of *successive use*, provided in the form of direct observation by a resident and/or a biologist be pivotal in the guidelines regarding the trimming of trees. Only dead branches or those posing significant safety risks should be pruned; canopies and remaining branches must be left intact. I propose the addition of staff to the Urban Forestry Division in the form of an unencumbered Biologist, Habitat Specialist, or Diversity Specialist to help the City preserve *sensitive habitat*, and that preservation be an enforceable policy of the Guidelines. I propose we use our change in policy guidelines not to decrease habitat and destroy canopy but to use them to benefit the habitats in our trees and our own habitat as well. The timing is critical as the Metro Lines are actively proceeding in construction that may directly and irrevocably destroy parkway habitats.

It is time to acknowledge the presence of sensitive habitat in our urban forest; other cities are already doing so. Los Angeles leads the way in arts, in entertainment, in confronting head – on the challenges of growth, diversity, freedom, and tolerance.

It is time for us to lead the way again.

Respectfully,

Victoria J. Waks, M.A. Zoology  
Raptor Researcher  
11041 Richland Avenue  
Los Angeles, CA 90064  
310. 916 7319

Cc: Mayor Eric Garcetti  
Council President Herb Wesson, Jr.  
Councilmember Paul Koretz

# THE URBAN WILDLANDS GROUP, INC.

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P.O. Box 24020, LOS ANGELES, CALIFORNIA 90024-0020, TEL (310) 247-9719

February 17, 2014

Councilmember Joe Buscaino, Chair  
Public Works and Gang Reduction Committee  
Los Angeles City Council  
200 North Spring Street  
Los Angeles, CA 90012

Re: Council File No. 14-0019 – Street Tree Guidelines and Policies

Dear Chair Buscaino:

The Urban Wildlands Group agrees with and supports the motion to ensure that tree trimming contractors follow applicable arboricultural standards and that contractors failing to do so be barred from future contracts or face penalties. As much as we support the content of the motion, however, it is only a first step to address the environmental harm regularly being done by tree trimming contractors in the City of Los Angeles.

Steps to improve tree trimming by contractors reporting to the Urban Forestry Division are necessary, but will not be sufficient, to protect the urban forest for both residents and wildlife. The Urban Forestry Division is just one of many City entities that contracts with firms to trim or remove trees. For example, the Fire Department is currently undertaking a massive tree canopy removal program in the hillside areas in which it is dramatically trimming or removing trees in the public right of way and on private property. This removal project extends well beyond the clearance required for fire apparatus under City and State code and is resulting in removal of many protected trees, as well as violations of established arboricultural trimming standards. This project, which is ongoing, was not coordinated with the Urban Forestry Division, has not received any public oversight or environmental review, and is resulting in significant loss of shade canopy and protected trees across multiple canyons. As another example, the Department of Water and Power employs its own tree trimming contractors, which also fail to abide by arboricultural standards and have been documented to remove or trim trees far beyond what is necessary to maintain clearance from electrical lines. Although the subject of the motion is the Urban Forestry Division, other City entities have significantly greater resources to remove and trim trees. To be effective, the current motion should be amended to extend trimming standards and oversight to contractors engaged by any department or agency under the control of the City and not only those hired by the Urban Forestry Division.

Arboricultural standards that have been adopted by the City do not address compliance with applicable laws protecting birds and other wildlife. City, State, and federal laws protect migratory birds and their nests. Los Angeles Audubon Society has compiled these regulations

into a set of bird-friendly tree trimming guidelines that could be adopted by the City to protect nesting birds. In addition, the City has an obligation to assess whether trimming activities will impact habitat for sensitive species of wildlife. Cooper's Hawk (*Accipiter cooperii*), a raptor species that nests in Los Angeles, is considered to be a sensitive species by the State of California when it is nesting. Furthermore, disturbance of nesting trees for any species of raptor (even when a nest is not active) is generally considered to be a significant impact in environmental impact analysis. The City has a responsibility to protect trees used by raptors for nesting from anything other than extremely judicious hazard reduction. We encourage you to adopt standards to both avoid disturbance of nesting birds through the bird-friendly tree trimming guidelines and to avoid significant adverse environmental impacts by the improper and unnecessary trimming of raptor nesting trees.

The City is in dire need of a new policy initiative for the urban forest or a recommitment to and enhancement of the principles articulated when the Street Tree Policies were adopted in the 1990s. Despite a long-term increase in urban forest cover during the period from the 1920s to the end of the century (Gillespie et al. 2012), after 2000 a downward trend is evident (Lee 2012). Green cover (trees, shrubs, and grass) was lost across all City Council districts at a significant rate, about 2% of the total area lost per year from 2000 to 2008 (Lee 2012). At the same time, the City faces a drought and extreme summer temperatures. Notwithstanding the water used to irrigate trees, their presence is a significant environmental benefit because of the reduction in maximum temperatures from shading and evaporative cooling (Bowler et al. 2010), with associated reductions in energy consumption for air conditioning and avoidance of excess heat-related human mortality.

The Million Trees Los Angeles partnership has not resulted in significant increases in urban tree canopy, in large part because of the reliance on private property owners to plant and maintain trees themselves (Pincetl et al. 2013), and in fact the period since its establishment has seen tree canopy declines. Furthermore, Million Trees Los Angeles did not establish canopy coverage goals, a weakness of the program. The City does not regularly report metrics of tree canopy cover and has not separately set percentage goals for tree canopy. This means that Los Angeles is lagging behind best municipal practices in terms of setting goals and reporting urban forest condition. A numerical goal for tree canopy cover is an essential part of a modern urban forest plan. It would be straightforward for the City to report regularly on progress toward quantitative urban forestry goals by using automated analysis of high-resolution aerial photographs already taken every three years by the Los Angeles Region Imagery Acquisition Consortium. For a city as geographically diverse as Los Angeles, tree canopy cover goals could be varied based on land use, zoning, and environmental objectives.

In sum, we encourage you to take the first steps outlined in the motion to improve the quality of trimming implemented for City street trees. Further steps should include enforcing trimming standards for all City contractors, adding bird-friendly trimming guidelines to the City's standards, identifying and protecting raptor nesting trees from disturbance, setting urban forest tree canopy cover goals for the City, and regularly reporting progress toward those goals using readily available data.

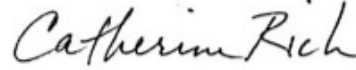


Please feel free to contact Travis Longcore at [longcore@urbanwildlands.org](mailto:longcore@urbanwildlands.org) or (310) 247-9719 if you have any questions.

Sincerely,



Travis Longcore, Ph.D.  
Science Director



Catherine Rich, J.D., M.A.  
Executive Officer

## **Literature Cited**

- Bowler, D. E., L. Buyung-Ali, T. M. Knight, and A. S. Pullin. 2010. Urban greening to cool towns and cities: a systematic review of the empirical evidence. *Landscape and Urban Planning* 97:147–155.
- Gillespie, T. G., S. Pincetl, S. Brossard, J. Smith, S. Saatchi, D. E. Pataki, and J. D. Saphores. 2012. A time series of urban forestry for Los Angeles. *Urban Ecosystems* 15:233–246.
- Lee, S. J. 2012. Effects of building modifications and municipal policies on green cover in Los Angeles County. Ph.D. Dissertation, University of Southern California, Los Angeles.
- Pincetl, S., T. Gillespie, D. E. Pataki, S. Saatchi, and J.-D. Saphores. 2013. Urban tree planting programs, function or fashion? Los Angeles and urban tree planting campaigns. *Geojournal* 78:475–493.



February 17, 2014

*VIA ELECTRONIC MAIL*

Councilmember Joe Buscaino, Chair  
Public Works and Gang Reduction Committee  
City Hall  
200 N. Spring Street  
Los Angeles, CA 90012

**RE: Council File No. 14-0019, Street Tree Policies and Guidelines**

Dear Chairperson Buscaino:

The Endangered Habitats League (EHL) appreciates the opportunity to comment on this guidance. For your reference, EHL is Southern California's only regional conservation group.

EHL supports the motion to require tree trimming contractors to follow applicable arboricultural standards and that contractors failing to do so be barred from future contracts or face penalties. We also urge important additional steps to realize the intent of the motion. In this regard, we concur with Los Angeles Audubon Society and The Urban Wildlands Group, including but not limited to, the following recommendations:

- 1) Make full use of the Audubon Society's guidance to protect nesting birds and raptors <<http://losangelesaudubon.org/index.php/tree-trimming-guidelines-mainmenu-155>>.
- 2) Adopt and enforce tree-trimming guidelines for *all* City contractors, such as Department of Water and Power and Fire Department.

Thank you for considering our views and for recognizing the value of wildlife to the City and its residents.

Yours truly,

A handwritten signature in blue ink, which appears to read 'Dan Silver', is placed within a light gray rectangular box.

Dan Silver, MD  
Executive Director