

# THE URBAN WILDLANDS GROUP, INC.

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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.

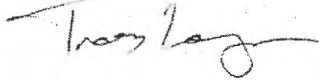
The City is in dire need of a new policy initiative for the urban forest or a recommitment to and enhancement of the principles articulated when the Street Tree Policies were adopted in the 1990s. Despite a long-term increase in urban forest cover during the period from the 1920s to the end of the century (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.

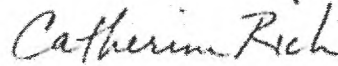
In sum, we encourage you to take the first steps outlined in the motion to improve the quality of trimming implemented for City street trees. Further steps should include enforcing trimming standards for all City contractors, adding bird-friendly trimming guidelines to the City's standards, identifying 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.