

# **SIDEWALK REPAIR PROGRAM**

City of Los Angeles, Los Angeles County, California  
SCH No. 2017071063

## **FINAL RECIRCULATED PORTIONS OF THE ENVIRONMENTAL IMPACT REPORT**

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# Chapter 1

## Introduction

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### 1.1 Introduction

#### 1.1.1 CEQA Overview

This document is the Final Recirculated Portions of the Environmental Impact Report (Final REIR or FREIR) for the Sidewalk Repair Program Environmental Impact Report (2021 EIR or EIR) (State Clearinghouse [SCH] No. 2017071063) prepared for the City of Los Angeles Sidewalk Repair Program (SRP or Project). The 2021 EIR consists of the Draft EIR (DEIR or 2021 Draft EIR) and the Final EIR (FEIR or 2021 Final EIR) texts.

The 2021 EIR was certified on June 22, 2021, but subsequently challenged by United Neighborhoods for Los Angeles and Angelenos for Trees, resulting in a judgment in favor of the petitioners and decertification of the 2021 EIR<sup>1</sup>. The Recirculated Portions of the Environmental Impact Report (REIR), consisting of the Draft REIR, or DREIR, and this Final REIR text, addresses the legal defects in the 2021 EIR identified by the court so that the City of Los Angeles (City) may reconsider the Project for approval. Portions of the EIR were recirculated pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15088.5. The REIR is in addition to the 2021 EIR.

When an EIR has been certified and decertified pursuant to a court order, prior to the revisions, recirculation is still undertaken to give the public the opportunity to review and comment on the proposed revisions (see, for example, *Ione Land, Air, & Water Defense Alliance, LLC v. County of Amador* [2019], 33 Cal. App. 5<sup>th</sup> 165, 169 [*Ione Valley*]). As noted in *Ione Valley*, “If the revision is limited to a few chapters or portions of the EIR, the lead agency need only recirculate the chapters or portions that have been modified” (CEQA Guidelines Section 15088.5[c]).

The DREIR contained all revisions made to the 2021 EIR. As discussed in the DREIR and further below, the City requested that reviewers limit their comments to the revised chapters or portions of the 2021 EIR (CEQA Guidelines Section 15088.5[f][2]). The DREIR was available for public review for 48 days between June 6, 2024, and July 23, 2024.

The Final REIR consists of the Draft REIR; this Final REIR text, including comments and responses; and other information added by the City in the record of proceedings.

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<sup>1</sup> *United Neighborhoods for Los Angeles v. City of Los Angeles* (Los Angeles County Superior Court Case No. 21STCP02401) (*United Neighborhoods*).

### 1.1.2 Summary of Project

The Project is a citywide program to modify how sidewalk repair projects are undertaken pursuant to City obligations under the *Willits* Settlement Agreement (*Willits* Settlement), which includes various City actions to provide improved access for persons with mobility-related disabilities in accordance with local, state, and federal accessibility requirements. The Project includes a proposed ordinance to establish and codify the new Sidewalk Repair Program, which, in turn, will guide future sidewalk repairs; curb ramp repairs; crosswalk paving; street tree retention, removal, and replacement; canopy pruning; root pruning; and applicable utility work for 30 years in the city under the *Willits* Settlement.

The fundamental objective of the Project is to ensure continued and efficient compliance with the requirements of the *Willits* Settlement while amending the existing program for sidewalk and curb ramp improvements within the city, in accordance with applicable accessibility requirements, including those required by the Americans with Disabilities Act. To achieve its fundamental objective, the proposed ordinance will provide the vehicle through which the Sidewalk Repair Program Street Tree Policy and Sidewalk Repair Program Mandatory Project Features Policy (collectively, Policies) will be adopted by the City. The Policies were described in detail in the 2021 EIR and are attached, along with the ordinance, as Appendix FREIR-A for reference. No changes to the ordinance or Policies are proposed or necessitated by Final REIR.

As set forth in detail in Appendix FREIR-A and the 2021 Draft EIR (Section 2.0, *Project Description*), as amended by the 2021 Final EIR (Chapter 4 and Appendix FEIR-C-1), the ordinance sets specific parameters to enable the City Engineer or designee to issue ministerial approvals for most sidewalk repairs so long as the repairs satisfy specific enumerated conditions. For example, to qualify for ministerial approval, the repairs must fall within the specific parameters of the construction scenarios described in the 2021 EIR (Scenarios 1 and 2 in 2021 Draft EIR Section 2.5.3). Further, the sidewalk repairs or reconstruction work must incorporate the Policies, as described fully in the 2021 EIR (see 2021 Draft EIR Sections 2.4.4 and Appendix FREIR-A).

Separately, the ordinance establishes a streamlined discretionary approval process for sidewalk repair projects necessitated by the *Willits* Settlement but falling outside the specific parameters allowed for ministerial approvals. However, even under the streamlined approval process, the sidewalk repairs must still incorporate the Policies, as described fully in the 2021 EIR (see 2021 Draft EIR Sections 2.4.4 and Appendix A). For these discretionary approvals, the 2021 EIR, as modified by the recirculated portions of the EIR, would serve as programmatic analysis of the impacts; further Project-level environmental review would be performed as necessary, depending on whether the Project is within the scope of the EIR, pursuant to CEQA Guidelines Section 15168.

Finally, as set forth more fully in the 2021 EIR (2021 Draft EIR Section 2.5.4), the ordinance requires incorporation of the Sidewalk Repair Program Street Tree Policy, establishing, among other things, a 2:1 replacement-to-removal ratio for the first 10 years, a 3:1 ratio for years 11 to 21, and a 2:1 ratio for the last 9 years of the 30-year program. The ordinance also requires incorporation of the Sidewalk Repair Program Mandatory Features Policy, consisting generally of regulatory compliance measures and standard construction conditions and procedures.

## **1.2 Purpose of the Final REIR**

In accordance with CEQA Guidelines Sections 15088 to 15089, the Lead Agency must evaluate comments received on the DREIR, prepare written responses to each significant environmental issue, and incorporate the comments and responses into the FREIR. The Lead Agency should also consider the information contained in the FREIR before approving a project. Pursuant to CEQA Guidelines Section 15132, a Final EIR shall consist of (a) the DEIR or a revision of the DEIR; (b) comments and recommendations received on the DEIR, either verbatim or in summary; (c) a list of persons, organizations, and public agencies commenting on the DEIR; (d) the responses of the Lead Agency to significant environmental points raised in the review and consultation process; and (e) any other information added by the Lead Agency.

The DREIR was originally circulated for public review for 48 days from June 6, 2024, through July 23, 2024. The DREIR constitutes the first part of the FREIR and is incorporated by reference and bound separately.

## **1.3 Organization of the Final REIR**

This FREIR is organized into five main sections, in addition to appendices, as follows:

- Chapter 1 Introduction—This section provides an introduction to the Project and the FREIR.
- Chapter 2 Public Review Process—This section provides an overview of the public review process for the DREIR and a matrix of the parties that commented on the DREIR.
- Chapter 3 Responses to Comments—This section presents a response to each of the comments received during the public review period. Copies of the full original comment letters are provided in Appendix FREIR-B of this FREIR.
- Chapter 4 Revisions, Clarifications, and Corrections—This section provides a list of revisions that have been made to the DREIR, based on comments received from the public and agencies, and other items requiring revisions.
- Chapter 5 FREIR References—This section presents references for newly cited materials in the FREIR.

## 1.4 Information Incorporated by Reference

CEQA allows incorporation of other public documents by reference. This FREIR incorporates by reference information or analysis from the 2021 EIR.

Incorporation by reference requires that the incorporated document or portion of the document be made available to the public for inspection at a public place or public building and be briefly summarized where possible or briefly described if the data or information cannot be summarized in the environmental document (CEQA Guidelines Section 15150). Some responses provided in Chapter 3, Responses to Comments cite information contained in the 2021 Final EIR. Copies of the 2021 Final EIR are available to the public at these locations:

- Public Works Building (by appointment only, Monday–Friday 8:00 a.m.–4:00 p.m.)  
Bureau of Engineering, Environmental Management Group:

1149 S. Broadway, 6th Floor  
Los Angeles, CA 90015  
Contact: Lauren Rhodes  
[lauren.rhodes@lacity.org](mailto:lauren.rhodes@lacity.org)  
(213) 485-5733

Electronic copy is available at:

- <https://sidewalks.lacity.gov/environmental-impact-report>



# Chapter 2

## Public Review Process and Public Comments

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### 2.1 Public Review Process

The sections below summarize the public review process for the DREIR.

#### 2.1.1 Document Circulation

The Notice of Availability (NOA) for the Project DREIR was issued on June 6, 2024. Consistent with the requirements of Sections 15087 and 15105 of the CEQA Guidelines, the DREIR was submitted to the State Clearinghouse, Office of Planning and Research, and circulated for public review for 48 days, commencing on June 6, 2024, and ending on July 23, 2024.

### 2.2 Public Comments

During the 48-day public review period, 31 comment submissions were received in the form of electronic mail, letters, or direct input on the Sidewalk Repair Program’s website (<https://sidewalks.lacity.org>). Pursuant to CEQA Guidelines Section 15132(c), all comment submissions received during the public comment period are listed below. Submissions have been numbered, with agency letters first, followed by organizations, then individuals. Organization and individual comments are numbered in the order in which they were processed, then listed with the commenter’s name, any affiliation given in the submission, and category. Submission categories include those from a public agency (P), an organization (O), or an individual (I). Individuals who included mention of an affiliation yet appeared to be writing on their own behalf are categorized as “I.” All efforts were made to properly categorize comment submissions. Any mis-categorization was inadvertent and a result of confusion as to whether commenters were representing only themselves or their named affiliation. Refer to Appendix FREIR-B for a complete collection of all comment letters.

No.	First Name	Last Name	Affiliation	Category
1	Joanne	D’Antonio	Community Forest Advisory Committee (CFAC)	P
2	Marc	Vukceovich	Streets for All	O
3	Alek	Friedman	Urban Growth Advocates	O
4	Jessica	Lund	PICO NC Sustainability, Transportation, and Mobility Standing Committee	O
5	Laura	Velkei	Arts District Community Council LA	O
6	Casey	Madden	United Neighborhoods for Los Angeles (UN4LA)	O
7	Jeanne	McConnell	Angelenos for Trees	O
8	Robin	Rudisill	Coastal San Pedro Neighborhood Council	O

City of Los Angeles Department of Public Works,  
Bureau of Engineering

<b>No.</b>	<b>First Name</b>	<b>Last Name</b>	<b>Affiliation</b>	<b>Category</b>
9	Kelsey	Jessup	California Chapter of The Nature Conservancy (TNC)	O
10	Wansun	Song		I
11	Marianne	Davis		I
12	Lisa	Wolf		I
13	Tim	Mullen	SmartComment	I
14	Kim	Nguyen		I
15	Soraya	Dosaj		I
16	Georgia	Yamamura		I
17	Stacia	Nemeth		I
18	Mercedes	Ramirez		I
19	Kyle	Metcalfe	Konveio	I
20	Georgia	Yamamura		I
21	Adelita	Ceja		I
22	Heather	Lowry Stewart		I
23	Elaine	Bowling		I
24	Jacob	Emery		I
25	Olivia	Cueva-Fernandez		I
26	Tim	Micsko		I
27	Hugh	Kenny		I
28	Rebecca	Westberg		I
29	Marianne	King		I
30	Gregory	Wright		I
31	Doug	Epphart	Coastal San Pedro Neighborhood Council Board	I

# Chapter 3

## Responses to Comments

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This chapter presents all comments received during the public review process and the City’s responses to those comments, pursuant to Section 15088 of the State CEQA Guidelines. Section 3.1 provides Master Responses for prevalent topics and issues, and Section 3.2 provides a table with all comments and responses.

### 3.1 Master Responses

To minimize duplication and provide a comprehensive discussion, a set of Master Responses has been prepared for the most prevalent topics and issues that emerged from the body of comments received on the DREIR. As appropriate, individual comments reference a Master Response. A Master Response may provide more information than other comments; conversely, where warranted, the Master Response is referenced and accompanied by a tailored response.

These issues are summarized by subject area, as follows:

1. Comments that Are Outside the Scope of the DREIR
2. Tree Canopy and Selection of Replacement Trees
3. Habitat for Species
4. Cumulative Projects and Impacts

These Master Responses are referenced, as applicable, throughout the comments and responses table presented in Section 3.2 of this FREIR.

#### 3.1.1 Master Response No. 1: Comments that Are Outside the Scope of the DREIR

This Master Response addresses issues raised that are not within the scope of the DREIR or CEQA. The EIR was circulated in 2021. In *United Neighborhoods*, the court largely upheld the validity of the EIR but identified specific discrete defects. The DREIR revises those portions of the EIR that were invalidated by *United Neighborhoods*—and only those portions. As more fully identified in Sections 1.3 and 1.5 of the DREIR, this is limited to:

- Impacts on non-special-status species and common bird species,
- Short-term impacts on special-status species and common species,
- Impacts on naturally occurring trees and individual trees not contained within a locally designated natural habitat or plant community,
- Cumulative impacts on aesthetics, and
- Cumulative impacts on biological resources.

According to CEQA Guidelines Section 15088.5(c), when revisions are limited to a few chapters or portions of an EIR, as is the case here, a lead agency need only recirculate the chapters or portions that have been modified. If this is done, the agency may request that reviewers of the revised EIR limit their comments to the revised chapters or portions (CEQA Guidelines Section 15088.5[f][2]). The agency then needs only respond to (i) comments received during the initial circulation period (December 26, 2019, to May 31, 2020) that relate to unchanged chapters or portions of the document and (ii) comments received during the recirculation period that relate to chapters or portions of the earlier EIR that were revised and recirculated.

Responses to comments described in (i) are provided in 2021 Final EIR. These remain unchanged from the responses previously provided. Responses to the comments described in (ii) are provided in Chapter 3 of the FREIR.

Comments not falling into category (i) or (ii) are outside the scope of what CEQA requires the lead agency to provide responses to (CEQA Guidelines Section 15088.5[f][2]). This includes, but is not limited to, new comments on unchanged portions of the EIR, comments on topics outside the scope of the EIR, and comments on topics outside the scope of CEQA. In particular, as stated in Section 1.5 of the DREIR, comments on unchanged portions of the EIR are barred from further challenge by the legal doctrine of res judicata. Though the City is not required to respond to these comments, it has provided responses to many for informational purposes. Further, as stated in Section 15132 of the CEQA Guidelines, a Final EIR (in this case, the Final REIR) must include responses to comments pertaining to “significant environmental points.” Put another way, “lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR” (CEQA Guidelines section 15204[a]). Comments outside of this scope do not require a response, though responses are still provided herein for many such comments for informational purposes.

Some commenters raised issues regarding economic or financial issues related to the implementation of the Project. In addition, some commenters raised questions regarding the inequity of the allocation and/or location of street trees. Consistent with CEQA Guidelines Section 15131, Economic and Social Effects, the REIR is not meant to address these issues; rather, the purpose of CEQA and the REIR is to fully analyze and mitigate, to the extent feasible, the Project’s potentially significant physical impacts on the environment. However, as noted on page 2-5 of the DREIR, when replacement cannot occur in the general area where a tree was removed, the tree will be placed in historically low-canopy areas with a high “heat island” index or areas of the city with poor air quality, as determined by the South Coast Air Quality Management District (SCAQMD), the California Office of Environmental Health Hazard Assessment, or the California Environmental Protection Agency. This would have a positive effect on the existing habitat in low-income communities where low-canopy areas with a high heat-island index are more likely to occur. Nonetheless, impacts of the Project on heat islands are beyond the scope of the issues evaluated in the REIR.

Some commenters provided examples or anecdotal evidence regarding street tree installations or removals under various programs or by residents. Although these comments provide context for why a commenter may favor or oppose the Project, or additional information related to the existing setting, they do not address issues within the scope of the recirculated portions of the REIR. It is also noted that the City has policies and procedures in place that it uses to identify tree removals and implement replacements. The City's policy, as discussed on pages 2-4 and 2-5 of the DREIR, is to avoid removing trees unnecessarily. The Project would remove only those trees that meet the criteria found in the Sidewalk Repair Program Street Tree Policy, as determined under the direction of the City's Urban Forestry Division (UFD). Trees eligible for removal would be those dead, diseased, or otherwise unlikely to survive pruning or the management required to ensure accessibility and public safety. Notwithstanding the case-by-case anecdotal evidence presented in the comments, the City's policies/procedures/practices are sound and favor successful outcomes. Modeling in the 2021 EIR assumed a mortality rate of 8 percent. The assumption, which was grounded in actual historical mortality rates, is conservative because it did not account for replantings. The Court did not find any legal defect with respect to this assumption. Actual mortality also remains under 8 percent. Therefore, there have been no revisions in the REIR with respect to this figure.

Several of the comments expressed an opinion for or against the Project but did not pertain to the adequacy of the analysis or the conclusions in the REIR or, more broadly, environmental issues. Rather, these are opinions that relate to the merits of the Project. It is noted that, although such opinions and comments on the Project's merits received during the REIR process do not require responses in the REIR, they may provide important public input to reviewing the Project overall. Therefore, merits and opinion-based comment letters are included in the Final REIR for consideration by the decision-makers at the Project's approval stage.

Additional topics not related to the environmental issues addressed in the REIR were raised by commenters. Although informational responses are provided to many such comments, no such response is required by CEQA.

Section 15003 explains the emphasis of CEQA upon good-faith efforts at full disclosure rather than technical perfection. CEQA does not require technical perfection in an EIR but, rather, adequacy, completeness, and a good-faith effort at full disclosure. CEQA also "does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commentors" (CEQA Guidelines Section 15204[a]).

### **3.1.2 Master Response No. 2: Tree Canopy and Selection of Replacement Trees**

Many commenters expressed an opinion that the DREIR does not consider canopy loss to be an impact or suggested that the Project would result in loss of canopy, even with the replacement of trees at 2:1 and 3:1 ratios. Some comments suggested that this would occur because larger trees are more likely to be replaced with smaller street trees and the mortality of the replacement street trees was not considered. However, as provided in Master Response No. 1 (Comments that Are

Outside the Scope of the DREIR), the only canopy topic in the DREIR is related to short-term impacts on the tree canopy, and the DREIR provided the analysis on such short-term canopy impacts in Section 2.3 (pages 2-6 through 2-10). Therefore, all other comments related to the canopy are on unchanged portions of the DREIR and do not require a response. Notwithstanding, as discussed below, the 2021 EIR did consider actual removal, and thus, for informational purposes, the Master Response below is provided.

The DREIR explains in Section 2.2 (page 2-2) that tree canopy would result in a net reduction until Year 30, at which time it is expected to fully recover with the planting of replacement trees. The greatest total canopy loss would be experienced in Year 13 when the street tree canopy would be reduced by 0.3 percent, or 53 acres from the existing 45,061 acres of street tree canopy (0.1 percent of all trees citywide). This analysis is derived from the 2021 Draft EIR (Section 3.3.3.1, pages 3-3-27 through 3-3-32), which used modeling that was based on existing street tree inventory data and actual street tree removals, replacements, and mortalities during fiscal year 2016–2017. Incorporating actual data and consultation with experts, the modeling assumed that the average replacement street tree canopy represents only 62.6 percent of the average removed street tree canopy (730 square feet compared to 1,166 square feet).

Street tree maintenance and monitoring would help minimize tree mortality for the first 3 years of planting (establishment period). UFD would maintain and monitor growth through visual inspections when street trees are manually watered 33 times a year. Replacement street trees that do not survive in their first 3 years would be replaced at a 1:1 ratio. Thus, trees planted during each year would be maintained for the next 3 years under the Project to help ensure long-term viability of the tree.

The 3-year maintenance period is based on UFD’s historic experience with street trees (see the 2015 Street Tree Policy, which sets forth the City’s historical experience with a 3-year maintenance period, as adopted by the policy). Under the Project, the typical maintenance period is further augmented by the 1:1 replacement component during the first 3 years, after which the 3-year maintenance period would begin anew.

To model the loss of trees due to mortality, the analysis evaluated a range of rates, from 2 to 8 percent. After considering actual historical data, a conservative estimate was used reflecting that trees between the post-establishment period and maturation die at a rate of 8 percent. Trees that die during the establishment period are not part of the mortality calculations, nor are trees that survive to maturity because they are not uniquely vulnerable to mortality more than any other tree and are not part of the mortality analysis.

The DREIR in Section 2.3 (pages 2-6 through 2-9), evaluated the impacts of canopy loss in terms of short-term impacts and found that the canopy would begin to recover after Year 13 and recover to the baseline canopy in Year 30. By Year 46, the Project is anticipated to add nearly 300 acres of canopy beyond the baseline.

The DREIR also acknowledges that, besides being smaller on average than removed trees, replacement trees may not be the same species as the removed trees. As noted in Section 2.2 (page 2-5) of the DREIR, replacement tree species will be selected by the City's UFD. The species would typically be chosen to match the existing predominant species at the relocation site. Native trees may be considered feasible for a specific location. For any species of tree chosen as a replacement tree, there may be several benefits as well as problems. For example, although large native trees may provide more shade and habitat value than smaller and/or non-native trees, those trees may also be more water intensive, may be more damaging to infrastructure, and may require more maintenance in the urban setting.

Commenters have expressed the opinion that an additional unaccounted loss may occur without proper maintenance. Appendix A of the DREIR presents the street tree maintenance and monitoring requirements for Project implementation. For the first 3 years of planting, UFD would maintain and monitor growth through visual inspections when street trees are manually watered 33 times a year. Replacement street trees that do not survive in their first 3 years would be replaced at a 1:1 ratio. Thus, street trees planted during each year would be maintained for the next 3 years under the Project to help ensure long-term viability of the street tree.

The 3-year maintenance period is based on UFD's historic experience with street trees (see the 2015 Street Tree Policy, which sets forth the City's historical experience with a 3-year maintenance period, as adopted by the policy). Under the Project, the typical maintenance period is further augmented by the 1:1 replacement component during the first 3 years, after which the 3-year maintenance period would begin anew.

Regarding that loss of any type or size class of tree, as a worst case-scenario, the number of street trees to be removed would be 12,860 out of a total of 6.3 million trees citywide, including those on private property and open space areas, or 0.2 percent of the city trees (before replacement trees are considered). The number of trees that would be removed is likely to be far less. As stated in the DREIR (Section 3.5, page 3-20), in the first 7 years of the program, the number of actual tree removals has been far less than expected, with an average of 110 trees removed per year (anticipated to be 292 to 336 per year in years 1 through 10). Approximately 80 percent of the trees adjacent to the Project areas have been retained using alternative methods to repair sidewalks without removals. Further, trees that are removed will be removed citywide, not at a single location, with an estimated average of 1.27 trees for every square mile of the city. Tree removals from the Project will be a small amount of the existing tree inventory, leaving 99.8 percent of the trees in place. As such, even though larger trees are more likely to be affected by the Project, the number of existing trees left, including large trees, will continue to provide habitat similar to that of the existing setting.

As recognized in the DREIR (Section 2.3.1, page 2-7), street trees make up an important part of the habitat for many birds and other wildlife in Los Angeles; however, individual trees are only components of the available habitat network within the city and nearby areas. Habitat is made up

of a collection of resources, including shelter, food, water, soil, light, favorable temperature, and other life-sustaining components. Wildlife is not restricted to using single trees; in fact, resident birds and other wildlife have home ranges that cover many trees and other surrounding vegetation, some traveling several miles while foraging or searching for other habitat resources. Migrating birds travel hundreds, or even thousands, of miles and rely on the general habitat within the city and adjacent areas, not individual trees. Wildlife is expected to adjust to the loss of individual trees, particularly when considering that 99.8 percent of the trees will remain intact. The removal of trees, especially those that may be dead or dying, would not result in a substantial loss of habitat for wildlife, including raptors.

### **3.1.3 Master Response No. 3 Habitat for Species**

Commenters have expressed concern that the removal of trees, in general, would result in the loss of habitat for wildlife, particularly raptors and other birds. Some comments specifically state that replacing large trees with smaller trees that would not reach the height or canopy size of the removed trees would result in a loss of habitat for raptors that prefer larger trees. The DREIR acknowledges that street trees are part of the urban forest and that they provide beneficial habitat for wildlife, especially birds (Section 2.4.2, page 2-14). As stated in the DREIR, the Project would preserve all trees to the extent feasible. Tree removals would be required to comply with specific criteria before any tree is removed. In fact, as discussed in Section 2.2 (page 2-4) of the DREIR, approximately 80 percent of trees adjacent to the Project have been retained using alternative methods to repair sidewalks without removals. Regardless, street trees will be removed, and the canopy will be reduced until replacement trees mature. After Year 13, the tree canopy will begin to increase until Year 30 when the street tree canopy is expected to return to baseline conditions.

As recognized in the DREIR (Section 2.2, page 2-2), street trees make up an important part of the habitat for many birds and other wildlife in Los Angeles; however, individual trees are only components of the available habitat network within the city and nearby areas. Habitat is made up of a collection of resources, including shelter, food, water, soil, light, favorable temperature, and other life-sustaining components. Wildlife is not restricted to using single trees; in fact, resident birds and other wildlife have home ranges that cover many trees and other surrounding vegetation, some traveling several miles while foraging or searching for other habitat resources. Migrating birds travel hundreds, or even thousands, of miles and rely on the general habitat within the city and adjacent areas, not individual trees.

Some tree species provide more foraging opportunities than others. As discussed in Section 2.2 (page 2-3) of the DREIR, a study of avian street tree foraging in Los Angeles found that birds do exhibit a preference for some trees and seldom forage at others. If these preferred trees were removed in large numbers and not replaced, it could result in a reduction in foraging resources. However, the overall number of trees, including preferred trees, expected to be removed is relatively low (i.e., 1.9 percent of existing street trees). The loss of a relatively small number of



trees, even if they are preferred for foraging, would not substantially deplete foraging habitat in the city. Further, although attempts will be made to replace trees with the same or similar species, even non-preferred replacement tree species provide resources. In fact, a study referenced in Appendix D of the DREIR found that tree species richness was a leading factor in the density of avian use when native trees were limited, as is the case among city street trees where more than 700 tree species are documented. Further, open spaces provide a much greater density of preferred trees, especially coast live oak and western sycamore, as well as other vegetation not found in city streets. These areas represent the greatest habitat for birds and other wildlife in the city and are used at greater frequencies by most species. With more than 6.3 million trees citywide, the loss of a relatively small number of street trees, even those preferred for foraging by birds, would represent a very small amount of foraging resources relative to what is available.

As discussed in the DREIR (Section 2.3, page 2-7), the number of trees that will be removed represents a very small part of the overall available habitat, both among other street trees (1.9 percent of street trees) and citywide (0.2 percent of all city trees). Further, over the 30-year duration of the Project, the removed trees would not be from any one area but, rather, spread out across the city; on average, 1.27 trees would be removed per square mile of the city.

Even before considering tree replacement, the number of trees, as well as the loss of canopy, is very small compared to what is available for wildlife. This analysis applies to trees of all sizes, including tall trees that are disproportionately used by some raptors. Although taller trees may be preferred by many raptors for nesting and roosting, the number of trees that will be removed is a relatively low number of the available street trees and citywide trees. In addition, a study that collects annual data on nesting raptors in and around Griffith Park found that most raptor species showed a significant preference for parks and open space over urban and suburban areas. The relatively few trees that will be removed, even if they are suitable for use by raptors, do not represent a significant part of the raptor habitat in the city and general area, especially considering that most nests and territories are found in open space. Those species that nest in the urban areas appear to be able to adjust to changing conditions.

### **3.1.4 Master Response No 4: Cumulative Projects and Impacts**

This Master Response addresses comments regarding the cumulative impact analysis, which is described in Chapter 3.0, *Recirculated Portions of the Cumulative Impacts Chapter*. As identified in Section 1.3 of the DREIR, the court held that:

- The 2021 EIR's summary of the projections approach failed to adequately describe the cumulative context of the Project with respect to tree impacts. This includes failing to incorporate by reference or summarize some projections the City sought to use to establish the cumulative context.

- The 2021 EIR’s analysis of the cumulative aesthetic and biological impacts of the Project together with other projects improperly evaluated only the Project’s impacts.

The DREIR addressed these issues by:

- Describing the plans, programs, and projections whose implementation, alongside that of the proposed Project, could result in cumulative impacts on aesthetics and biological resources (DREIR Section 3.3). The plans, programs, and projections considered in the DREIR’s cumulative analysis included:
  - City of Los Angeles General Plan
    - City of Los Angeles General Plan, Framework Element
    - City of Los Angeles General Plan, Mobility Plan 2035
  - City of Los Angeles Bureau of Street Services 2015 State of the Street Trees Report
  - City of Los Angeles Bureau of Street Services 5-Year Strategic Plan
  - Green New Deal pLAn 2019
  - Los Angeles County General Plan
    - Los Angeles County General Plan, Mobility Element (Mobility Plan 2035)
  - Southern California Association of Governments (SCAG) Regional Comprehensive Plan
  - SCAG 2016–2040 Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS)
  - SCAG Connect SoCal 2020
  - Los Angeles County Metropolitan Transportation Authority (Metro) Long-Range Transportation Plan (2020)
  - SCAQMD 2022 Air Quality Management Plan
- Incorporating by reference the plans, programs, and projections, along with, where applicable, their corresponding EIRs, in accordance with CEQA Guidelines Section 15150 (DREIR Section 3.2).

With respect to revising the analyses of cumulative impacts on aesthetics and biological resources to account for the effects of the proposed Project in combination with the cumulative projects (DREIR Sections 3.4 and 3.5), commenters noted the difficulty in analyzing potentially significant cumulative impacts under the plan amendments due to the programmatic level of the analysis. The City reviewed all comments related to cumulative impacts and developed this Master Response to address the recurring themes of the overall approach to the programmatic level of detail and the completeness and level of detail of the project list (plans and policies) developed for the cumulative impact analysis.

As identified in Section 3.1 (page 3-1) of the DREIR, to establish the impacts of past, current, and probable future projects, an EIR may<sup>2</sup> take either of two approaches. An agency may compile a list of such projects (CEQA Guidelines Section 15130[b][1][A]); alternatively, the agency may compile a summary of projections contained in a planning document or EIR (CEQA Guidelines Section 15130[b][1][B], [d]); Public Resources Code Section 21100[e]). “Under either method, the EIR should establish the geographic scope of the area affected by the cumulative impacts” (*League to Save Lake Tahoe, supra*, 75 Cal. App. 5<sup>th</sup> at p. 149; see CEQA Guidelines Section 15130[b][3]). The EIR then uses the chosen approach to develop a summary of the expected environmental effects to be produced by the past, current, and probable future projects with references to additional information if applicable.

The DREIR elected to use a projections-based approach to evaluate the impact of past, current, and reasonably probable future projects, relying on the plans, programs, and projections described above. This is a reasonable approach, given the programmatic nature of the proposed Project and its geographic scope. According to the Los Angeles Department of Building and Safety, the City has issued an average of approximately 150,000 building permits each year since 2018 (City of Los Angeles 2024a). It would not be practical for the REIR’s cumulative analysis to use a list-based approach that includes all past, current, and probable future projects and their associated tree removals, nor is such an analysis required under CEQA. The discussion of cumulative impacts should be guided by standards of practicality and reasonableness (see CEQA Guidelines Section 15130[b]).

When using the projections approach, quantifiable data are not always available. CEQA Section 15151 establishes that an EIR must be prepared with enough analysis to provide decision-makers with the information needed to make an intelligent decision about a project’s environmental consequences. Further, the data used in an EIR need not be exact. When precise data are not readily available, an EIR may rely on informed estimates but should not speculate about the cumulative impacts that may occur (*Preserve Wild Santee v City of Santee* [2012], 210 CA4th 260, 277, 148 CR3d 310).

The cumulative impact analysis in the DREIR disclosed where precise estimates of tree removals resulting from the cumulative plans, programs, and projections were not available and relied on reasonable assumptions, based on facts to inform the cumulative analysis in these cases. For example, Section 3.3.1, page 3-6 of the DREIR states that “[t]he Mobility Plan 2035 EIR does not include an estimate of street trees that would be removed with implementation of Mobility Plan 2035; however, Mobility Plan 2035 includes as one of its program elements the repair of all existing degraded sidewalk sections to City standards, which specifically included the *Willits*

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<sup>2</sup> If an agency finds that the combined impact of a proposed project and other projects is insignificant, or that the project’s incremental contribution is not cumulatively considerable, “the EIR may, but is not required to,” use these technical requirements for the cumulative impacts analysis (*League to Save Lake Tahoe, supra*, 75 Cal. App. 5<sup>th</sup> at pp. 148–149).

Settlement sidewalk repairs that make up the Project.” Section 3.5, page 3-18 of the DREIR states that “the Mobility Plan 2035 EIR found that the biological resources impacts of the plan, which included the repair of ‘all existing degraded sidewalk sections,’ not just the sidewalk repairs that would make up the monetary limitations in the *Willits* Settlement, would be less than significant, even with no limitations on the number of removed trees because all work would occur in existing rights-of-way, and any removal would be done in accordance with all existing City policies...” As another example, Section 3.5, page 3-19 of the DREIR states that “[t]he 2016–2040 RTP/SCS EIR does not include an estimate of street trees that would be removed with implementation of the 2016–2040 RTP/SCS or an evaluation of impacts specifically related to street tree removals. However, the 2016–2040 RTP/SCS EIR did analyze, as part of its project, the repair of 10,500 miles of new and improved sidewalks, which would be greater than the maximum scope of the Project, and found that project biological impacts would be significant as a result of potential conflicts with local policies or ordinances protecting biological resources, including open spaces that may be protected under city or county general plans...” As another example, Section 3.5, page 3-19 of the DREIR states that “Connect SoCal 2020 did not include any policies or other planning objectives specific to street tree removals (SCAG 2020). The Connect SoCal EIR found that incorporation of transportation projects under Connect SoCal may result in the conversion of open space or vacant lands to new uses. Mitigation measures to address potential impacts include design features to complement the dominant landscaping in the area, replacing and renewing landscaping along corridors with road widenings, and providing new corridor landscaping that provides appropriate transitions to existing features.”

The DREIR’s analyses of cumulative impacts on aesthetic and biological resources (DREIR Sections 3.4 and 3.5) clearly disclose that none of the cumulative plans, programs, and projections include specific estimates of tree removals. The DREIR bases its analysis on an evaluation of the tree removal–related policies in the cumulative plans, programs, and projections, along with the cumulative analyses in the City’s Mobility Plan 2035, SCAG’s 2016–2040 RTP/SCS and EIR, and SCAG’s 2020 Connect SoCal 2020 RTP/SCS and EIR, each of which accounts for sidewalk repairs and street removals contemplated by the *Willits* Settlement and the Project and therefore cover the impacts of the Project.

Based on the evaluation, the DREIR concludes that, while some plans indicate that overall changes to the aesthetics and biological resources related to tree removals could be significant, the Project’s contribution would not be cumulatively considerable. As stated in Section 3.5, page 3-16 of the DREIR, “the City has reviewed all plans, programs, and programmatic CEQA documents that could evaluate cumulative aesthetic impacts with respect to trees in and around the city. No single document contains such a specific evaluation. However, the City’s Mobility Plan 2035 and EIR specifically analyze the complete repair of all city sidewalks and expressly include more limited repair of city sidewalks, as contemplated by the *Willits* Settlement and the Project, and found that aesthetic impacts from such activities would be less than significant. In addition, SCAG’s 2016–2040 RTP/SCS and EIR as well as SCAG’s 2020 Connect SoCal 2020 RTP/SCS and EIR also

specifically analyze, as part of the adopted ATP, the repair of 10,500 miles of deficient sidewalks and all deficient sidewalks, respectively, and found that such aesthetic impacts would be less than significant, even without a limitation on the amount of trees removed. Furthermore, some projects, plans, and programs indicate that trees in the city and surrounding areas will decrease during the life of the Project, while others indicate that they will increase. As such, any estimate as to the overall net cumulative change in street trees over the life of the Project due to other projects would be speculative. In addition, development under many of these programs is subject to existing requirements that serve to address potential impacts on aesthetics. Private development in the city is generally subject to the design review process, which requires development projects to be designed in accordance with community guidelines and standards. Nonetheless, when accounting for the amount of overall development included in the cumulative projects described above, including sidewalk repairs and street tree removals, even though the overall scope of these projects, such as the conversion of open land, grade separation projects, and highway projects, would be magnitudes greater than sidewalk repairs, it is assumed that there could be significant cumulative impacts with respect to aesthetics.” A similar discussion regarding cumulative impacts on biological resources is on page 3-20 of the DREIR.

Several commenters note that the City’s tree and street tree canopy cover has declined in recent years due to ongoing development, including development that could occur under the cumulative projects. For example, commenters point to a 2017 study in the journal *Urban Forestry & Urban Greening*, which shows that development of single-family lots in Los Angeles County resulted in a 1.2 percent annual decrease in tree/shrub cover (5.6 percent of existing tree/shrub cover) and a 0.1 percent annual decrease in grass cover (2.3 percent of existing grass cover) over a 10-year period (Lee, Longcore, Rich, Wilson [Lee et al.] 2017). Although the study did not distinguish between street trees and trees on private property, its overall conclusion is consistent with the DREIR’s cumulative impact analysis, which concluded that ongoing changes occurring in the City would result in cumulative impacts on aesthetics and biological resources that would be significant. A description of the 2017 study has been added to the REIR, as discussed in Chapter 4, Revisions to the REIR.

The DREIR goes on to evaluate whether the proposed Project’s contribution to the significant cumulative impact is cumulatively considerable, in accordance with CEQA Guidelines Section 15130(a). Here, the Draft REIR determines that the Project’s contribution to cumulative impacts on aesthetics and biological resources would not be cumulatively considerable, based on the temporary nature of the Project’s impacts, the fact that it would not affect natural habitat, and the net increase in the number of street trees that would result (see DREIR pages 2-6, 2-14, and 3-20). Therefore, the DREIR’s analysis is supported by facts and consistent with CEQA’s requirements for cumulative analysis.

Several commenters discussed the aspirational aspects of the Green New Deal, as well as the success of the Green New Deal in meeting its goals and questioned the funding to support the program. Specifically, commenters claim that the DREIR relies on assumptions about future tree

planting and future tree cover that are based entirely on promises and proposals and the notion that adopted plans that have been funded. To date, the Green New Deal has planted 70,000 trees; however, broadly, due to contractual issues, it did not meet the goal of planting 90,000 trees by the end of 2021. It is a reasonably foreseeable project to include in the cumulative analysis pursuant to CEQA's definition of cumulative effects. Furthermore, as discussed above, notwithstanding the potential beneficial effects that could result from implementation of the Green New Deal, the DREIR analysis nonetheless concludes that cumulative impacts on aesthetics and biological resources, while ongoing changes in the City's trees could lead to significant impacts related to aesthetics and biological resources, the Project's contribution to such impacts would not be cumulatively considerable.

### **3.2 Response to Comments**

Below are responses to the individual comments.

Number	Comment	Response
<b>P-1: City of Los Angeles Community Forest Advisory Committee (CFAC)</b>		
P-1-1	<p>CFAC acknowledges the effort that went into this supplement to the EIR and appreciates that trees are being further addressed and recognizes that there are improvements. In our analysis the issues that still remain with the procedures and ramifications of the Project are presented in this comment letter.</p> <p>1.1, p.1-1. No changes to the ordinance or Policies are proposed or necessitated by the recirculated portions of the EIR.</p> <p>We maintain that mitigating objections and analyses presented in this comment letter will necessitate changes to the ordinance or at least to the Project’s proposed policies.</p> <p>2.1, p. 1-6, Application of Thresholds BIO-1 and BIO-2 to Supplemented Portions of Analysis.</p> <p>2.2, p. 2-2, Impacts on Non-Specific Status and Common Bird Species.</p> <p>At Year 13 of the Project, it is projected that the loss of tree canopy resulting from the Project will be at the maximum (i.e., 0.3 percent loss of the street tree canopy or 0.1 percent loss the total tree canopy in the city of Los Angeles). The canopy is expected to increase after Year 13 and fully recover after 30 years. These small temporary losses are not expected to significantly affect the ability of urban wildlife to nest, forage, take shelter, perch, or utilize habitat in other ways. In addition, the Project is expected to increase age structure diversity and size diversity in the street trees as well as increase the canopy and associated habitat benefits for neighborhoods with few trees currently present.</p>	<p>The comment is introductory but includes a statement regarding CFAC’s objections to the analyses in the DREIR. It contends that the remainder of its comments will support changes to the ordinance. No environmental issue in relation to CEQA is raised, and no further response is required.</p>
P-1-2	<p>Maximum canopy loss for Street trees is calculated at .3% until year 13, which is evaluated to be less than significant. However, the percentage of critical high value habitat trees, particularly those utilized by raptors, that are to be removed may be proportionately much higher. At the bottom of p. 2-2, the Draft EIR states that . . . trees would only be removed if dead or exhibit specific indications of extreme stress or poor health such that they could be unable to be retained by root pruning due to their condition (see Appendix A, Street Tree Policy, page 2).</p>	<p>The commenter is correct. As further explained on pages 2-4 and 2-5 of the DREIR, larger trees are more likely to require removal related to sidewalk repair because they more frequently damage sidewalks compared with smaller trees. Larger mature trees have been found to provide better foraging opportunities than smaller and younger trees. As such, there will be a period when the replacement trees provide fewer habitat benefits compared with the benefits at full maturity. There are some additional factors, however, to consider in evaluating the effects of tree removal. For example, among the trees preferred by birds, large mature individuals that are healthy provide higher-quality foraging. However, to avoid removing trees unnecessarily, the</p>

Number	Comment	Response
		<p>Project would remove only trees that meet the criteria found in the Sidewalk Repair Program Street Tree Policy, as determined under the direction of the City’s UFD. Only trees that are dead, diseased, or otherwise unlikely to survive pruning or the management required to ensure accessibility and public safety would be removed. As such, most of the trees that would be removed would be dead or unhealthy; these may lose foliage and otherwise have a reduced function with respect to benefitting wildlife. Although dead and dying trees offer habitat features that can be used by wildlife, including cavities, which are used by some species, generally, dead and dying trees provide reduced habitat function for most wildlife compared to healthy trees. Healthy trees have greater canopy cover compared to dead and unhealthy trees and can host more insects and vegetation for foraging by many species. Further, dead, dying, and sick trees, although part of a healthy ecosystem, with an important role in natural settings, can cause complications in an urban setting when they create safety hazards (e.g., when they become uprooted or when branches break). In addition, though dead and unhealthy trees often have reduced canopy cover and function for wildlife, they still take up substantial space, which is limited in an urban setting. Removing dead and unhealthy trees frees up space in which to plant healthy trees that can grow to replace the lost canopy. First Steps, an urban forest planning document for the city, identified dead trees as a limitation to increasing canopy cover in the city that delays the opportunity to replace trees (Dudek 2018). Therefore, the DREIR acknowledges that larger trees would be removed as part of the Project; this would occur when certain criteria are met that warrant removal. The overall success of the Project, including the restored canopy, is, in part, dependent on removing diseased trees that prevent the opportunity to plant healthier trees that can eventually provide equal or greater canopy. Therefore, the Project would not have a proportionately higher impact on trees that provide high-value habitat.</p>
P-1-3	<p>Tree species should be specified, along with stress and health, as an assessment criteria of the potential for retention of the tree after root pruning. Pines for example are reported by UFD to be poor candidates for root pruning. Further these tallest maturing trees are less likely to be replanted due to VOC emissions that restrict their planting to coastal regions of the City and also UFD restrictions on site size required to plant tall species.</p>	<p>Root pruning assessments were not required to be, nor were they, recirculated. Please see Master Response No. 1 for issues and comments that are outside the scope of the DREIR. Notwithstanding, one of the objectives of root pruning, as identified in the Street Tree Policy in Appendix A of the DREIR, is to ensure that roots are pruned to retain a mature tree whose roots have already damaged a sidewalk. In the example that the commenter presents regarding pines, root pruning would not occur unless the roots have created damage. In the event of root pruning, City arborists and engineers</p>



Number	Comment	Response
		<p>shall make a determination as to whether root pruning would affect structural integrity and health and, as a result, cause a street tree to become unstable and therefore a public safety hazard. If a determination is made that street tree mortality and instability would occur, thereby creating a public safety hazard, then the City shall proceed with street tree removal.</p> <p>Although the actual tree species may not be an assessment criterion, once a tree, such as a pine, has been identified as requiring root pruning, the guidelines for root pruning consider whether a tree is a good candidate for root pruning. This would be determined on a case-by-case basis. Further, all street tree root pruning shall adhere to City root-pruning standards that comply with the International Society of Arboriculture (ISA) Tree Pruning Guidelines; the American National Standards Institute (ANSI) Trees, Shrubs, and Other Woody Plants Maintenance Standard Practices (ANSI A300); and best management practices of the tree care industry.</p> <p>This topic was not required to be, nor was it, addressed in the DREIR. Please see Master Response No. 1 for comments that are outside the scope of the DREIR. The concern is that the planting of taller trees may be restricted to coastal areas due to volatile organic compound emissions and the regional planting restrictions on tall trees. The City does not specifically restrict the planting of taller trees to areas near the coast due to VOC emissions.</p>
P-1-4	<p>Crucial, missing analysis is the percentage of tall maturing trees that are expected to be removed: various pine species, eucalyptus, liquidambar and other tall maturing trees that are high-value tree species for raptors, and that, if removed, will not be replaced in kind, as opposed to the overall percentage of all trees to be removed. A strategy to retain these trees is needed, perhaps involving exceptional efforts such as curb bump-outs and reconfiguring of sidewalks. Since the species that show up on the Project’s UFD tree removal notices most frequently listed for removal are the larger trees: liquidambar, eucalyptus, ficus, camphor, and carob, we want to be sure adequate that are large and tall at maturity are replanted to accommodate the raptors in the future.</p>	<p>Please see Master Responses 2 and 3 regarding tree canopy, the selection of replacement trees, and species habitat. In addition, alternatives, including curb bump-outs, were considered in Chapter 5, <i>Alternatives</i>, of the 2021 EIR. Chapter 5 was not required to be, nor was it, recirculated. Please see Master Response No. 1 for issues and comments that are outside the scope of the DREIR.</p>

Number	Comment	Response
P-1-5	<p>Without special provisions Los Angeles raptor species, including: American kestrel, Cooper’s Hawk, Red-tailed Hawk, Red-shouldered Hawk, Great Horned Owl, Sharp-shinned Hawk, and Peregrine Falcon will face a loss of habitat that is unlikely to be replaced, even after 30 years. Specifically addressing raptors, what mitigation is provided to reduce the impact when the taller trees they depend on are removed? Can the Program provide a mechanism to ensure continuance of this vertical component of the urban forest? Nesting Raptors of Griffith Park, 2020, reported: “Data collected on tree species found that the large, often non-native, trees (various pine and eucalyptus species) planted years ago provide important nesting habitat for our local raptor species. Often, they are the largest and most stable trees in the area, making them ideal locations for species such as the red-tailed hawk.” <a href="https://friendsofgriffithpark.org/nesting-raptors-of-griffith-park-and-surrounding-area/">https://friendsofgriffithpark.org/nesting-raptors-of-griffith-park-and-surrounding-area/</a></p>	<p>Please see Master Responses 2 and 3 regarding tree canopy, the selection of replacement trees, and species habitat.</p> <p>The commenter references a study that collects annual data on nesting raptors in and around Griffith Park, a 4,300-acre open space (Friends of Griffith Park 2020). The study includes several large open space areas and nearby urban and suburban neighborhoods. The study area was greatly increased in 2020. The expansion in 2020 provided some very helpful information regarding nesting behaviors between different raptor species. In general, most raptor species nest in open space/parks as well as urban/suburban areas; however, all but Cooper’s hawks showed a significant preference for parks and open space over urban and suburban areas. Cooper’s hawks showed a preference for urban and suburban areas.</p> <p>Although the authors recognize that there may be more Cooper’s hawks in open spaces, the species may be difficult to find in such areas. There are very likely many factors to explain why Cooper’s hawks have successfully nested in urban and suburban areas. The study suggests, as one potential factor, that there are fewer predators in the area. Other findings in the study that may explain why urban areas are suitable for nesting Cooper’s hawks include the species’ willingness to use a variety of tree species, significantly more so than the three other local species, which greatly favored one or two tree types (red-tailed hawk favored pines and eucalyptus, red-shouldered hawk favored eucalyptus and sycamores, great-horned owls favored pines). Cooper’s hawks use pine, eucalyptus, Shamel ash, sycamore, and “other/unknown” tree species regularly. Finally, the study also found that Cooper’s hawks had the lowest nest re-use rate (just 9 percent [one re-used nest] compared to 40 to 60 percent among the other three species). The study suggests that Cooper’s hawks are able to adjust to changing conditions in urban areas more than the other species.</p> <p>As shown in the referenced study, most raptors, other than Cooper’s hawks, favor open spaces where sidewalks generally do not occur, and the Project would have no effect. Cooper’s hawks may favor urban areas where trees will be removed; however, they show very little nest re-use.</p> <p>The relatively few trees that will be removed, even if they are suitable for use by raptors, do not represent a significant part of the raptor habitat in the city and general area, especially considering that most nests and territories are found in open space and those species that nest in urban areas appear to be able to adjust to changing conditions.</p>

Number	Comment	Response
P-1-6	<p>Very often the trees that are proposed to be removed are almost never replaced with tree species that mature to comparable width or height. To avoid future sidewalk lifting, replacement trees planted in the same location are nearly always a smaller species at maturity than the tree that was removed, this despite the opportunity during construction to make new hardscape accommodations for larger tree species. We need forward thinking instead of relying on what the City has been doing.</p>	<p>Please see Master Response No. 2 regarding tree canopy and the selection of replacement trees. In addition, two objectives of the Project are (1) to retain existing street trees that are the cause of sidewalk barriers to the extent feasible, provided the sidewalk improvements would not result in street tree mortality or compromise public safety, and (2) if the removal of one or more street tree is required, to ensure compliance with the City’s replacement requirements, which were adopted to ensure no net loss in street tree canopy at the end of the Project implementation period. Notwithstanding, the selection of replacement trees was not required to be, nor was it, addressed in the DREIR.</p>
P-1-7	<p>Beyond the height needed for raptors, the total volume of canopy (includes height and width canopy calculations) needs to be considered for ecosystem services. Studying the tree removal notices that have been issued so far in the program, the species chosen for replanting, even when counting the second replacement tree, do not equal the canopy of the largest trees removed for sidewalk repair. This is because very large canopy species such as liquidambar, pine, ficus, carob, eucalyptus, and camphor are never planted as replacement trees, as in the same unaltered site they would be expected to be prone to lifting sidewalk in the future. Yet this great height at maturity is critical for wildlife, particularly for raptors.</p>	<p>As noted in Master Response No. 2, long-term impacts regarding the tree canopy were determined to be adequately addressed in the 2021 EIR. The response regarding tree canopy in Master Response No. 2 is for informational purposes. Please also see Master Response No. 3 regarding species habitat.</p>
P-1-8	<p>Example: Tree removal notice for Sidewalk Repair Program at 2390 S. Portland St (see Tree Removal Notification below). One California Sycamore for City Sidewalk Repair Program listed to be replaced with 2 crape myrtle trees. This is a case of a very large canopy, healthy, native species tree being replaced with 2 small non-native trees, which are not tall enough to support raptors. California sycamore has a maximum height of 80’ with a canopy width of 20-50’ <a href="https://selectree.calpoly.edu/tree-detail/1107">https://selectree.calpoly.edu/tree-detail/1107</a>. Crape myrtle trees have a maximum height of 25’ and canopy width of 15-25’ <a href="https://selectree.calpoly.edu/tree-detail/788">https://selectree.calpoly.edu/tree-detail/788</a>. Two of these replacement trees will not increase canopy. Furthermore the crape myrtle requires pruning attention in its early years or it becomes a multi-trunk shrub that does not have anywhere near the same shade value as the sycamore tree. [Refer to Appendix FEIR-B of this Final EIR, Letter 1, page 4, for the tree removal notice referenced in the comment.]</p>	<p>The commenter provides an example of a single tree removal notification and expresses concerns for habitat for raptors and tree canopy. Master Responses 2 and 3 address tree canopy, the selection of replacement trees, and species habitat. The commenter also provided links to the <i>Cal Poly Tree Selection Guide</i> (Urban Forest Ecosystems Institute 2024a, 2024b), which provides information on a variety of species, including tree characteristics such as heights and canopies. Using this information, the commenter has concluded that, collectively, the two replacement trees will not replace the canopy of the single removed tree. The 2021 EIR, as well as the DREIR, did not assert that the canopy will increase at any one location; rather, the data indicate that the canopy will begin to recover after Year 13 and recover to the baseline by Year 30. By Year 46, the Project is anticipated to add nearly 300 acres of canopy beyond the baseline. Further, as noted on the tree removal notification, alternatives were considered to retain the tree in question but were determined to be not feasible. As discussed above in the response to P-1-6, the objectives of the Project are to retain street trees when feasible and,</p>

Number	Comment	Response
		<p>if not feasible, replace trees in a manner that results in no net loss of canopy. Over the lifetime of the Project, it is likely that there will be instances when tree removals occur and the replacement trees fail to provide the same canopy at a particular location. However, the overall goal is to maintain no net loss of tree canopy throughout the geographic area of the Project. The commenter notes that crape myrtles require pruning in their early years, as outlined in the SRP policies attached as Appendix A to the DREIR. Replacement trees shall be monitored for 3 years under the pruning guidelines set forth by the UFD. Replacement trees at specific locations may, even at maturity, not reach the same height as removed trees. The effects of and on larger trees was discussed in the DREIR on pages 2-3 and 2-4. When larger trees may be replaced with multiple smaller trees in specific instances birds and other species are expected to make use of other nearby trees. No evidence suggests that any significant environmental effects would result. With respect to the specific location discussed, the parkway size is 4 feet, which is appropriate for crape myrtles, but is too narrow for trees like sycamores, which require 6-8 feet. So this is an area where the larger tree that has damaged the sidewalk was replaced with multiple smaller trees more appropriate to the location. This is consistent with the Project's goals.</p>
P-1-9	<p>Photo below is of sycamores at the 2390 S. Portland St. address, though information on sheet is not adequate to identify which tree, or if it was a sycamore around the corner on this apartment building property. (In the spring of 2024 CFAC requested that UFD tree removal notices indicate the LA City Inventory TK8 I.D. number so the correct tree can be identified if there are multiple trees of the same species at the site. This information is now being provided for most tree removals.) [Refer to Appendix FEIR-B of this Final EIR, Letter 1, page 5, for the photo referenced in the comment.]</p>	Please see Response to P-1-8, above.
P-1-10	<p>Controller Ron Galperin's Nov. 17, 2021 audit of the SRP indicated that 3,700 accessibility requests and 4,400 rebate applications had been received from the beginning of the program in 2017 through Dec. 2020.</p>	<p>This comment does not raise a CEQA-related environmental issue; the commenter provides data on the 2021 audit regarding the number of applications received under the street replacement program. Please see Master Response No. 1 for comments that are outside the scope of DREIR.</p>
P-1-11	<p>Here is an example of a rebate tree removal request at 4664 Arriba Drive in Tarzana: the tipu tree listed to be removed can grow to 50' with a 25-50' canopy: <a href="https://selectree.calpoly.edu/tree-detail/1419">https://selectree.calpoly.edu/tree-detail/1419</a></p>	Please see Master Response No. 1 for comments that are outside the scope of the DREIR.

Number	Comment	Response
	<p>[Refer to Appendix FEIR-B of this Final EIR, Letter 1, page 6, for the photo referenced in the comment.]</p> <p>The tree to be removed is in good health. This case is a rebate request under the SRP that dates back to 2022.</p> <p>A June 2024 check on this site (photo below) indicated that the tree was not removed nor was the sidewalk fixed. This would be a good case for a bump-out into a parking spot to give the healthy shade-producing tree more room.</p> <p>[Refer to Appendix FEIR-B of this Final EIR, Letter 1, page 7, for the photo referenced in the comment.]</p> <p>Again the Tree Removal Notification lists the smaller crape myrtle trees as the replacement species. (see below)</p> <p>[Refer to Appendix FEIR-B of this Final EIR, Letter 1, page 8, for the tree removal notice referenced in the comment.]</p>	<p>The commenter provided a link to the <i>Cal Poly Tree Selection Guide</i>, (Urban Forest Ecosystems Institute 2024c), which provides information on the tipu tree. As discussed on pages 2-4 and 2-5 of the DREIR, larger trees are more likely to require removal due to sidewalk repair because they more frequently damage sidewalks compared with smaller trees. Larger mature trees have been found to provide better foraging opportunities than smaller and younger trees. As such, there will be a period when the replacement trees provide fewer habitat benefits compared with the benefits at full maturity. There are some additional factors, however, to consider in evaluating the effects of tree removal. For example, among trees preferred by birds, large mature trees that are healthy provide higher-quality foraging. However, to avoid removing trees unnecessarily, the Project would remove only trees that meet the criteria found in the SRP Street Tree Policy, as determined under the direction of the UFD. Trees eligible for removal would be those dead, diseased, or otherwise unlikely to survive pruning or the management required to ensure accessibility and public safety. As such, most of the trees that would be removed would be dead or unhealthy; such trees may lose foliage or otherwise have a reduced function to the benefit of wildlife. Although dead and dying trees offer habitat features that can be used by wildlife, including cavities, which are used by some species, generally, dead and dying trees provide reduced habitat function for most wildlife compared to healthy trees. Healthy trees have greater canopy cover compared to dead and unhealthy trees and can host more insects and vegetation for foraging by many species. Further, dead, dying, and sick trees, although part of a healthy ecosystem, with an important role in natural settings, can cause complications in an urban setting where they create safety hazards when they become uprooted or when branches break. In addition, though dead and unhealthy trees often have reduced canopy cover and function for wildlife, they still take up substantial space, which is limited in an urban setting. Removing dead and unhealthy trees frees up space in which to plant healthy trees that can grow to replace the lost canopy.</p> <p>Lastly, as discussed on page 2-6 of the DREIR, the rebate program allows residential or commercial property owners to voluntarily undertake sidewalk repair work that meets accessibility requirements. Under the rebate program, removal is the responsibility of the individual homeowner. The commenter notes that the proposed replacement tree is a smaller tree than the current tree and suggests that a bump out be considered. The notes on the tree removal</p>

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		<p>notification indicate that all alternatives were considered to retain the trees but none of the alternatives were feasible. It is beyond the scope of the DREIR, as a programmatic document, to evaluate each individual notification.</p> <p>With respect to this specific location, the property owner was not willing to meander the sidewalk onto their property. The City extensively analyzed alternatives in the 2021 EIR such as meandering sidewalks for the project and found them infeasible for several reasons, including economic reasons. This reasoning remains true. It would be unreasonable to expect the City to conduct a citywide sidewalk restoration and tree replacement program by purchasing or condemning a multitude of private parcels—which the City does not currently own or control. The alternatives analysis was not required to be re-circulated by the court decision. To date, the tree remains in place, and no work has commenced.</p>
P-1-12	<p>2.2, p. 2-3. Under normal circumstances, when street trees are removed under the Project, wildlife would leave the Project area when disturbance becomes intolerable, thereby avoiding direct impacts. These individuals would be expected to use adjacent and nearby trees as well as other vegetation as a replacement for the removed tree. This includes avian species as well as grey squirrels and raccoons, which may also nest in street trees. It also includes some common bats, which may roost in trees that have crevices or substantial peeling bark.</p> <p>There are not always “adjacent or nearby trees” or suitable vegetation to be used by wildlife as replacement for the removed tree. Los Angeles has very little control over what happens to property trees and canopy studies indicate decline in canopy. Single family homes are by L.A Municipal code 12.21 C. 1 (g) supposed to have a front yard tree, but this is not enforced as many yards are paved to use as parking, wider driveways and ADUs. Lee, Su Jin, Travis Longcore, Catherine Rich, and John P. Wilson. 2017. Increased Home Size and Hardscape Decreases Urban Forest Cover in Los Angeles County’s Single-Family Residential Neighborhoods. Science Direct Volume 24, May 2017, Pages 222–235. <a href="https://www.sciencedirect.com/science/article/pii/S1618866716303296">https://www.sciencedirect.com/science/article/pii/S1618866716303296</a>.</p>	<p>Approximately 1.9 percent of street trees and 0.2 percent of citywide trees would be removed as part of the Project. This leaves 98 percent of street trees and 99.8 percent of citywide trees intact to provide habitat resources to wildlife.</p> <p>Compared to wild areas and other open spaces, urban and suburban areas have relatively high levels of disturbance and often change. Because of this, as discussed in Section 2.3.1 of the DREIR, urban forest wildlife species tend to be adaptable. A study noted in the DREIR found that birds were especially resilient; observations found no change with scattered tree removals.</p> <p>As discussed in the DREIR, the relatively small portion of the urban forest that would be removed as a result of the Project would not reduce the available habitat.</p> <p>The DREIR noted that some projects, plans, and programs indicate that trees in the city and surrounding areas will decrease in number during the life of the Project, consistent with the commenter’s assertion; however, some projects, plans, and programs also indicate a net increase. The comment is noted but does not suggest any defect regarding the cumulative impacts analysis. Please see Master Response No. 4 for further information regarding the analysis of cumulative impacts. As discussed in Master Response No. 4, the 2017 study cited in the comment (Lee et al. 2017), which shows a decline in tree canopy cover resulting from residential development in the City, is consistent with the DREIR’s cumulative impact analysis.</p>

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P-1-13	<p>Furthermore according the LA TreeKeeper 8 City street tree inventory July 3, 2024 (<a href="https://losangelesca.treekeepersoftware.com/index.cfm?deviceWidth=1688">https://losangelesca.treekeepersoftware.com/index.cfm?deviceWidth=1688</a>) there are 214,971 vacant street tree sites and there are 662,214 actual street trees. This means the existing street tree situation is already at a one third deficit. Stephen DuPrey reported to CFAC on Nov. 2, 2023 (recording available) that City Street Tree Inventory counted 215,000 vacant street tree sites and 2,300 stumps. This indicates an increase in vacant sites by 29 trees, possibly due to the fact that street trees can be removed, and an in lieu of planting fee paid (Tree Guarantee Fee). Hector Banuelos of UFD indicated at the May 2024 CFAC meeting (recording available) these Tree Guarantee Fee trees were not being planted last year or this year due to lack of UFD planting crews, and funds are just piling up. Decline in canopy means fewer trees for wildlife relocation and fewer host trees for the insects needed by birds, thus limiting their food sources.</p>	<p>The commenter’s reference to the live street tree inventory (City of Los Angeles 2024b) and concerns regarding a deficit in the existing street tree situation are noted. The baseline for purposes of the analysis is identified in Section 2.2 of the DREIR; as indicated, the baseline remains the number of street trees at the time the 2021 EIR was published, which was approximately 711,248 trees. However, for full disclosure, the DREIR also provides information on the City’s updated street tree count, which was completed in December 2023. The count identified 660,034 street trees. This estimate provides for a more conservative analysis since the proposed removals under the project constitute a larger percentage of existing street trees. Though this comment refers to some conditions after that point in time, the general comment about the “deficit” in the “existing street tree situation” is noted and is consistent with the DREIR’s description of existing conditions and the cumulative setting. The comment does not raise any issue regarding the accuracy or adequacy of the analysis in the DREIR. This comment does not pertain to environmental issues analyzed under CEQA. Please see Master Response No. 1 for comments that are outside the scope of the DREIR.</p>
P-1-14	<p>The many tree removals under the Sidewalk Repair Program that are rebate requests, once approved are not monitored by Urban Forestry or any other City entity. No biologist report is required before trees are removed under this portion of the Program. And no follow up is done on the quality of the work. Consider this rebate case at 6712 Kraft Avenue. See Tree Removal Notification below and photos. The initial request in 2020 was for one black locust removal, and the replacement species was listed as 2 Southern oaks. The second request was in 2022, this time the species was corrected to 2 honey locust removals, and the replacement species was listed as 4 African fern pines. The Tree Removal Notifications are below, and you can follow the progress of what has happened at this site in the photos that follow.</p> <p>[Refer to Appendix FEIR-B of this Final EIR, Letter 1, page 10-11, for the tree removal notices referenced in the comment.]</p> <p>First photo is from 2007 – Google Map shows a heavily canopied street. The second photo from 2019 Google Maps shows the trees were heavily pruned and outgrowing their growing space. New</p>	<p>Street Tree Policy maintenance and monitoring requirements were not required to be, nor were they, recirculated. Please see Master Response No. 1 for comments that are outside the scope of the DREIR. Notwithstanding, the rebate program sets forth specific criteria that must be met for tree removal and a rebate to be considered. These are the same maintenance and monitoring requirements provided in the Street Tree Policy for all SRP projects. These requirements are conditions in the permits for the rebate program and would be enforced by the City, as appropriate and/or assumed by the City, as part of the SRP, as appropriate.</p> <p>As noted in the comment, trees are outgrowing their space. The commenter offers conjecture but no proof of a lack of water. The commenter states that there is no follow-up on the success of the replacement trees. As outlined in Appendix A of the DREIR, for the first 3 years of planting, replacement street trees shall be maintained and monitored for growth under the direction of UFD through visual inspections at the time when street trees are manually watered (i.e., 33 times per year for 3 years). Young street trees that do not survive in the first 3 years must be replaced at a 1:1 ratio. The young street trees must be able to withstand slight to moderate drought or other stress.</p>

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	<p>property trees behind the fence may have used the water resources that once served the street trees.</p> <p>[Refer to Appendix FEIR-B of this Final EIR, Letter 1, page 12, for the photo referenced in the comment.]</p> <p>In the 2022 Google Maps photo below, honey locust trees were removed, and the replacement trees were planted in the existing parkway, 3 at the property site and one next door. One of the property site's new street trees was not a standard sapling and may not grow into a single trunk tree. And the fourth tree planted next door (on the far left), is staked but given that the African fern pine is evergreen, this sapling looks brown, as if it was not watered and went into serious decline or died.</p> <p>[Refer to Appendix FEIR-B of this Final EIR, Letter 1, page 13, for the photo referenced in the comment.]</p> <p>On a visit to the same site in June 2024, a photo (see below) shows that the property owner installed bricks that turned the parkway into below-standard-size tree wells that are far too small for African fern pines, compromising their ability to get water and survive.</p> <p>[Refer to Appendix FEIR-B of this Final EIR, Letter 1, page 14, for the photo referenced in the comment.]</p> <p>And in the above photo of the African fern pine replacement tree in the adjacent site, the one that is staked, looks worse, is likely dead and has a shrub taking over.</p> <p>This example shows that we cannot depend on property owners to take on the care for street trees. Follow up inspections are needed until trees are established to ensure that the urban forest is being repopulated. If this is not in the budget, then the calculated projected canopy figures become wishful thinking.</p>	<p>With respect to this specific site, UFD recently visited the area and found the newly-planted trees onsite to be in fair condition. The offsite tree is in poor condition and will be replaced by UFD in the fall planting season.</p>
P-1-15	<p>Even when the request is not a rebate, but presumably an access request, there is no follow up on whether replanting takes place. A large American sweetgum (liquidambar) at 6749 N Atoll in North Hollywood (see photo below) was designated for removal for the Project.</p> <p>[Refer to Appendix FEIR-B of this Final EIR, Letter 1, page 15, for the photo referenced in the comment.]</p>	<p>The Street Tree Policy maintenance and monitoring requirements were not required to be, nor were they, recirculated. In addition, the remodeled portion of the property, as identified in the photographs, is on private property and outside the scope of the Project. Additionally, this site was removed from the rebate program due to the tree being illegally removed by the property owner. The property owner was issued a notice to comply and instructed to replant one 48-inch box-maidenhair tree (Ginkgo biloba) and, due to spacing constraints, pay the Tree Planting Guarantee</p>



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	<p>This site is listed as the second line on the Tree Removal Notice below on December 20, 2019 for The Sidewalk Repair Program Bid Pkg 56. (see below)</p> <p>[Refer to Appendix FEIR-B of this Final EIR, Letter 1, page 16, for the tree removal notification referenced in the comment.]</p> <p>A Google map photo from 2022 (see photo below with new fence) shows the tree removed, the sidewalk repaired, and a makeover that includes a fence and construction of a second story.</p> <p>[Refer to Appendix FEIR-B of this Final EIR, Letter 1, page 17, for the photo referenced in the comment.]</p> <p>A visit to the site in July 2024 shows that no replacement trees were planted (photo below).</p> <p>[Refer to Appendix FEIR-B of this Final EIR, Letter 1, page 17, for the photo referenced in the comment.]</p> <p>This is the July 2024 side view photo of the parkway where there are no trees. (photo below)</p> <p>[Refer to Appendix FEIR-B of this Final EIR, Letter 1, page 18, for the photo referenced in the comment.]</p> <p>To further exacerbate the lack of canopy the yard was paved into a parking lot so there is no tree there to comply with the one yard tree LAMC 12.21 C. 1 (g). (see photo below).</p> <p>[Refer to Appendix FEIR-B of this Final EIR, Letter 1, page 19, for the photo referenced in the comment.]</p> <p>A close photo of the address on the house is provided here for verification since the property looks so different. (photo below). The address display is just below the porch frame.</p> <p>[Refer to Appendix FEIR-B of this Final EIR, Letter 1, page 19, for the photo referenced in the comment.]</p> <p>This site is on a block in North Hollywood with tall liquidambar trees on both sides, yet property owners are not replanting when they remove a tree. There is not a single sapling on this entire block, but there are vacant tree sites, usually when a property is extensively remodeled that includes repair of the sidewalk. Cooling shade is needed to protect residents from heat-related death, yet there appears to be no monitoring on whether we are judiciously providing this shade for the future when trees are removed.</p>	<p>fee for the second required tree. Nonetheless, this removal was not a part of the Project. Please see Master Response No. 1 for comments that are outside the scope of the DREIR.</p>

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P-1-16	While we did not have the means to visit every site for which a Tree Removal Notification was issued for the Project, these examples indicate that the counts will be running short of the projections in the EIR, and no plan has been offered to mitigate the unplanted or failed replacement trees.	<p>When precise data are not readily available, an EIR may rely on informed estimates. The Street Tree Policy maintenance and monitoring requirements, as well as the tree modeling analysis, were not required to be, nor were they, recirculated. Please see Master Response No. 1 for comments outside the scope of the DREIR. The examples identified in the commenter’s letter are not representative of SRP tree removals but, rather, selected to support the commenter’s assertions. The commenter’s conclusion that “counts will be running short of projections in the EIR” is not supported by the totality of the substantial evidence presented and discussed in the REIR, nor is it supported by the small and unrepresentative sample presented by the commenter. As discussed in the Draft DREIR, modeling was based on data from actual removals and replacements. Further, the number of actual historic tree removals under the program in years 1 to 7 (up to Fiscal Year 2022–2023, the last year to date) has been much less (i.e., on average, 110 trees removed annually) than the numbers presented in the EIR (i.e., 292 to 336 trees removed in years 1 to 10). Finally, it is impossible to make a conclusion that is based on handpicked examples of failure. Nonetheless, the 2021 EIR states that there are areas with deficiencies and acknowledges that improvements upon past efforts are needed to achieve success. The policies set forth by the proposed Project are intended to foster success. Substantial evidence supports the projections relied on in the 2021 EIR.</p> <p>Additionally, for the reasons discussed above, the handpicked examples discussed in the comment do not suggest that counts for replacements done under the Project will be insufficient or less than forecasted.</p>
P-1-17	According to Ryan Fonseca, LAist, Nov.17, 2021, “LA’s Approach to Fixing Sidewalks is “Broken,” Wasteful” and Needs Repair.”	The commenter provides a citation for an article that was published (Fonesca 2021) No further comment, request, or environmental issue was raised. The article discusses the disrepair of the city’s sidewalks and the obstacles to repair. Please see Master Response No. 1 for comments outside the scope of the DREIR.
P-1-18	<p>2.3, p. 2-8. To ensure accessibility, trees would be removed only if dead or exhibiting specific indications of extreme stress or poor health such that they may not survive the required work.</p> <p>2.4.2, p. 2-13. To ensure accessibility, trees would be removed only if dead or exhibiting specific indications of extreme stress or poor health such that they may not survive the required work.</p>	The commenter has provided a series of citations that are not sourced. Street Tree Policy removal requirements were not required to be, nor were they, recirculated. Please see Master Response No. 1 for comments outside the scope of the DREIR. Notwithstanding, the commenter notes that, historically, not all trees removed have been dead or dying. As discussed in the 2021 EIR, although it is not ideal to remove a healthy tree, at times, compliance with the <i>Willits</i> Settlement requires healthy tree removals. Two

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	<p>2.4.2, p. 2-14. As mentioned above, to ensure accessibility, trees would be removed only if dead or exhibiting specific indications of extreme stress or poor health such that they may not survive the required work.</p> <p>p. 16 of 25. The Project would remove trees only as necessary to fulfill requirements for accessible sidewalks.</p> <p>Only trees that meet certain criteria found in the City Sidewalk Repair Program Street Tree Policy, as determined by the City’s UFD, would be removed. Trees eligible for removal would be those dead, diseased, or otherwise unlikely to survive the pruning or management required to ensure accessibility and public safety. They may lose foliage or have a reduced function to benefit wildlife.</p> <p>p. 23 of 25. As mentioned above, trees would be removed only if dead or exhibiting specific indications of extreme stress or poor health; such trees may not survive the required work needed to ensure accessibility</p> <p>Not all trees historically removed for the Project have been dead or dying. At 1508-1538 N Crescent Heights healthy ficus were removed in the spring of 2024. (on right side of street in photo below) [Refer to Appendix FEIR-B of this Final EIR, Letter 1, page 21, for the photo referenced in the comment.]</p> <p>Urban Forestry to its credit tried to get an 18” property easement to save one of the trees, this one at the corner gas station (see 2 views of this ficus in photos below). [Refer to Appendix FEIR-B of this Final EIR, Letter 1, page 22, for the photos referenced in the comment.]</p>	<p>objectives of the proposed Project are to (1) retain existing street trees that are the cause of sidewalk barriers to the extent feasible, provided the sidewalk improvements would not result in street tree mortality or compromise public safety, and (2) if the removal of one or more street tree is required, to ensure compliance with the City’s replacement requirements, as adopted to ensure no net street tree canopy loss at the end of the Project implementation period. Furthermore, the Street Tree Policy removal criteria provide that a street tree may also have to be removed when the tree cannot be retained by root pruning because of condition or in the interest of public safety.</p> <p>Please see response P-1-30 regarding the specific trees referenced in this comment.</p>
P-1-19	<p>Without a requirement by code to value our canopy trees and require property owners to give them space, we get stuck with downsizing the urban forest with smaller crape myrtle trees that ultimately were planted at this site. The native desert willow was even rejected after this removal notice came out listing them as part of the replacement plan. See Tree Removal Notification below. [Refer to Appendix FEIR-B of this Final EIR, Letter 1, page 23, for the tree removal notification referenced in the comment.]</p>	<p>The Street Tree Policy replacement tree requirements were not required to be, nor were they, recirculated. Although it is not ideal to remove larger canopy trees, at times, it is necessary to facilitate adequate mobility and access, as outlined in the <i>Willits</i> Settlement. The comment does not suggest any inadequacy or inaccuracy with respect to any issue discussed in the DREIR. Please see Master Response No. 1 for comments outside the scope of the DREIR.</p>

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P-1-20	<p>The little crape myrtles were planted at the site with a promise of some large canopy coast live oak trees to be planted on other streets nearby, but these will be in spaces that would have already been utilized and planted with oaks if we had a more robust City planting program. Though we favor bump-outs, this site at the busy accessway to Laurel Canyon was not a good situation for this particular approach to tree preservation. Other approaches may have been possible, but no efforts were made to try a completely new solution. In Santa Monica rubber sidewalks are used to go over ficus roots in this type of situation. “With Rubber Sidewalks, Trees Are on the Rebound”  <a href="https://www.latimes.com/archives/la-xpm-2001-jul-14-me-22271-story.html">https://www.latimes.com/archives/la-xpm-2001-jul-14-me-22271-story.html</a>                      Even if the material does not last as long as concrete, the value of these huge shade trees to mitigate heat island effect would outweigh the need for future replacement of the sidewalk material.</p>	<p>The commenter cites a <i>Los Angeles Times</i> article (Pool 2001) that highlights flexible sidewalks in the city of Santa Monica. The Street Tree Policy replacement tree requirements and alternatives were not required to be, nor were they, recirculated. Please see Master Response No. 1. Notwithstanding, alternatives such as meandering sidewalks and alternative materials were thoroughly analyzed in the 2021 EIR (see 2021 Final EIR, Section 3.12 and 2021 Draft EIR, Section 5.3). In addition, as outlined in CEQA Section 15204, CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters.</p>
P-1-21	<p>2.3.1, p. 2-9. On a small neighborhood scale, especially in low-income communities where there are, generally, fewer street trees and less adjacent habitat available, street trees are more important because the removal of individual trees represents a larger reduction in overall resources in the immediate area. . . . As is the case in all areas, wildlife in these areas are expected to adapt and move to adjacent areas or other parts of the city with additional habitat features and resources. Wildlife leaving areas for areas of the City with more trees exacerbates the tree equity problem. The recent Los Angeles Urban Forest Equity Assessment Report describes the tree loss situation as dire and cites the two-for-one policy as inadequate. As an attempt for mitigation, it poses severe risk to large canopy trees:</p>	<p>The Street Tree Policy replacement tree requirements were not required to be, nor were they, recirculated. Please see Master Response No. 1 for comments outside the scope of the DREIR. In addition, the court found no deficiencies in the 2021 EIR related to low-income communities. The court did note, regarding the short-term impact analysis, that birds use street trees in low-income communities for foraging due to a lack of private yard vegetation.                      As stated on page 2-5 of the DREIR, replacement trees species would be determined by UFD. They would typically match the predominant tree species existing on the block at the replacement site, provided that the species are appropriate for the site. Native trees may be used when determined appropriate and feasible for the area. When choosing locations for replacement trees, the first choice would be the same location where the removed tree was located. However, when that is not feasible, trees would be placed in order of priority at the following locations: on either side of the same street/block as the removed tree; on the immediate street to the north, south, east, or west of the removed street tree; or in the neighborhood/community in which the street tree removal occurred (within 0.25 mile). When replacement cannot occur in the general area where a tree was removed, the tree would be placed in historically low-canopy areas with a high heat-island index or areas of the city with poor air quality, as determined by SCAQMD, the California Office of Environmental Health Hazard Assessment, or the California Environmental Protection Agency. This would have a positive effect on existing habitat in low-income communities</p>

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		<p>where low-canopy areas with a high heat-island index are more likely to occur. In addition, because sidewalk repairs would occur throughout the city and would not be concentrated in any particular area, tree removals would not be concentrated in any one area. Although, as a worst case, a maximum of 594 trees would be removed in a single year, these Would be spread out over the 467-square-mile Project area, with 1.27 trees removed per square mile in the worst-case scenario.</p> <p>In reference to the Los Angeles Urban Forest Equity Assessment Report cited by the commenter, it is noted that some of the interviewees stated that the two-for-one replacement policy is not sufficient and poses a risk to large canopy trees; however, the authors do not independently adopt this conclusion.</p>
P-1-22	<p>. . . current policies do not seem to be expanding tree canopy at a pace to keep up with their loss. The two-for-one replacement policy, for example, some interviewees noted, is not sufficient and poses severe risks to large canopy trees. Development and redevelopment are ostensibly taking out more trees than they are replacing. In fact, since 2000, many neighborhoods in the LA region have seen a tree canopy reduction of 14 to 55 percent, and street trees are lost at highest rates, due, in part to sidewalk repairs and street widening projects. <a href="https://laurbanresearchcenter.org/wp-content/uploads/2021/02/LAUF-Equity-Assement-Report-February-2021.pdf">https://laurbanresearchcenter.org/wp-content/uploads/2021/02/LAUF-Equity-Assement-Report-February-2021.pdf</a></p> <p>p. 25. Low income housing that is being built under ED 1 has no community/neighborhood council review and building tends to be lot line to lot line with very few trees and little obligation to consider street trees. The Mayor’s ED 1 revision letter simply states: “A project shall be eligible to request no more than a 25 percent reduction in any otherwise required tree planting requirements” – likely a reference to the upcoming Landscape Ordinance we have been reviewing.</p> <p>The pressure to build projects with low income housing is so strong that when contacted by CFAC members to speak up for tree retention at the BPW or City Council, Council Offices refuse to object to tree removals on either the property or the street if there is even minimal low income housing in the project. Extra effort is therefore needed to save any healthy tree by finding an extreme solution like diverting the sidewalk around the tree into a parking space.</p>	<p>This comment expresses an opinion and does not raise a CEQA-related environmental issue that is subject to recirculation as part of this DREIR.</p> <p>This comment further cites information from the Los Angeles Urban Forest Equity Report, which discusses a 2017 USC report, the findings of which are published in <i>Urban Forestry &amp; Urban Greening</i>. The comment notes that the Los Angeles region has seen a 14 to 55 percent reduction in tree canopy over a 10-year period, in part due to sidewalk repairs and street widening. The USC report indicates that the significant loss of tree/shrub cover, as well as grass cover, is from the development of single-family homes and societal changes throughout Los Angeles County (Lee et al.). The conclusions of the study were that green cover for single-family home lots declined anywhere from 14 to 55 percent (Lee et al.). As discussed in Master Response No. 4, although the study did not distinguish between street trees and trees on private property, its overall conclusion is consistent with the DREIR’s cumulative impact analysis, which concluded that ongoing cumulative impacts on aesthetics and biological resources would be significant. A description of the 2017 study has been added to the REIR, as discussed in Chapter 4, <i>Revisions to the REIR</i>.</p> <p>The addition does not change the conclusion that the Project’s contribution to such impacts would not be cumulatively considerable.</p> <p>The commenter further refers to development projects such as ED 1 and other low-income housing. Please see Master Responses 1 and 2 for comments outside the scope of the DREIR or regarding the tree canopy and the selection of replacement trees.</p>

Number	Comment	Response
P-1-23	<p>2.4.2. p. 2-14. The number of actual historic tree removals under the program in Years 1 to 7 (up to Fiscal Year 2022–2023, the last year to date) has been much less (i.e., on average, 110 trees removed annually) than the numbers presented in the EIR (i.e., 292 to 336 trees removed in Years 1 to 10). In addition, even before replacement trees have matured, they will incrementally provide more foraging, nesting, and refuge resources every year, reducing the effects of the tree removal until it becomes a net benefit when the tree canopy increases. We acknowledge there has been effort by the Project to avoid tree removals by narrowing sidewalks to retain the tree, as long as there is wheelchair turnaround area close by. Tree wells have been enlarged in some cases to give the tree more space and prevent future sidewalk lifting. There has also been a slowdown of the Project, possibly due to the successful challenge to the EIR. Proposed tree removal and sidewalk repair has not taken place at many sites. There are likely plans to accelerate the Project to “catch up” since apparently a workaround has been found to the challenge, and tree removals have resumed. But the reality is that the canopy of replacement species is smaller than what was removed.</p> <p>Examples (using Selectree <a href="https://selectree.calpoly.edu/">https://selectree.calpoly.edu/</a>)</p> <p>4860 and 4922 N Hazeltine Av – removal of American sweetgum (liquidambar)  Maximum tree height: 80 feet  Canopy width: 40 feet  Replacement: Markhamia lutea  Maximum tree height: 30 feet  Canopy width: 10-20 feet</p> <p>480 N ORLANDO AVE – removal of carob  Maximum tree height: 40 feet  Canopy width: 30-40 feet  Replacement: African sumac  Maximum tree height: 30 feet  Canopy width: 20-35 feet</p> <p>2220 W Las Colinas Av – removal of bottle tree  Maximum tree height: 40 feet</p>	<p>This comment expresses an opinion and does not raise a CEQA-related environmental issue that is subject to recirculation as part of this DREIR. Please see Master Response No. 1 for comments outside the scope of the DREIR.</p> <p>As to responding to comments regarding tree canopy impacts, the comment does not suggest any inadequacy or inaccuracy with respect to any issue discussed in the DREIR. Notwithstanding, speculation about a “slowdown of the Project” and “plans to accelerate the Project” are without any evidentiary support and do not pertain to the environmental analysis in the DREIR; therefore, no further response is required. Please see Master Response No. 2 for a discussion of the tree canopy and the selection of replacement trees.</p> <p>As this comment and the examples suggest, replacement trees at specific locations may, even at maturity, not reach the same height as removed trees. The effects of and on larger trees was discussed in the DREIR on pages 2-3 and 2-4. When larger trees may be replaced with multiple smaller trees in specific instances birds and other species are expected to make use of other nearby trees. No evidence suggests that any significant environmental effects would result.</p> <p>With respect to canopy, the analysis in the DREIR does not assume that the general replacement ratio will achieve an equal ratio of canopy replacement at each individual site. The comment does not undercut the analysis or conclusions in the DREIR that evaluate the total effects of the Project. Consistent with the comment’s suggestion, retention of trees is preferred under the Project, and removal is only undertaken if necessary.</p>

Number	Comment	Response
	<p>Canopy width: 20-30 feet Replacement: crape myrtle Maximum tree height: 25 feet Canopy width: 15-25 feet 4956 Stratford Av – removal of camphor Maximum tree height: 70 feet Canopy width: 50-60 feet Replacement: crape myrtle Maximum tree height: 25 feet Canopy width: 15-25 feet 1213 E. 56<sup>th</sup> St. – removal of Indian laurel fig (ficus) Maximum tree height: 40 feet Canopy width: 35-40 feet Replacement: evergreen pear Maximum tree height: 30 feet Canopy width: 15-30 feet Clearly the replacement species are smaller to avoid future sidewalk lifting. Just because the replacement is 2:1, this does not double the canopy because the second tree is occupying a space that could have been planted in addition to retaining the removed tree. The City’s tree planting sites are limited by spacing guidelines that are strictly adhered to by UFD <a href="https://streetsla.lacity.org/sites/default/files/BSS_TREE_SPACING_GUIDELINES.pdf">https://streetsla.lacity.org/sites/default/files/BSS_TREE_SPACING_GUIDELINES.pdf</a> and right of way real estate is limited by street lighting, driveways, DWP requirements, etc. Retaining a mature tree is optimal, and sidewalk repair should be viewed as an opportunity to creatively retain tree canopy utilizing alternatives that utilize materials and approaches not currently in use in Los Angeles.</p>	
P-1-24	<p>3.3.1. City of Los Angeles General Plan . . . p. 3-5</p> <ul style="list-style-type: none"> <li>Policy 5.3.1a (2) Sidewalks should be wide and lined with open canopied street trees, pedestrian scale street lights provided to recognized standards commensurate with planned nighttime use, and other pedestrian amenities.</li> </ul>	<p>The commenter provides a series of policy citations from the City’s General Plan Framework Element (City of Los Angeles 1974). Land use consistency requirements were not required to be, nor were they, recirculated. This comment refers to development projects and the City budget.</p> <p>The commenter provides a hyperlink to a video prepared by the Los Angeles Department of Water and Power (LADWP) to discuss staging area requirements and strategies (Los Angeles Department of Water and Power</p>

Number	Comment	Response
	<ul style="list-style-type: none"> <li>● Policy 5.5.1: Plant and/or facilitate the planting of street trees, which provide shade and give scale to residential and commercial streets in all neighborhoods in the city.</li> <li>● Policy 5.5.4: Determine the appropriate urban design elements at the neighborhood level, such as sidewalk width and materials, street lights and trees, bus shelters and benches, and other street furniture.</li> <li>● Policy 5.8.2.c: The primary commercial streets within pedestrian-oriented districts and centers should have shade trees, pruned above business signs, to provide a continuous canopy along the sidewalk and/or palm trees to provide visibility from a distance.</li> <li>● Goal 9Q: A sustainable urban forest that contributes to overall quality of life.</li> <li>● Objective 9.41: Ensure that the elements of urban forestry are included in planning and programming of infrastructure projects which involve modification of dedicated parkway, sidewalk and/or raised median islands.</li> <li>● Policy 9.41.1: Develop a coordinated public works construction protocol to take into simultaneous consideration street tree placement, paving material selection, below or above ground utilities, etc.</li> <li>● Objective 9.42: Facilitate the planting of large-canopied trees in street parkways.</li> <li>● Objective 9.43: Improve city tree selection, placement, and maintenance.</li> <li>● Policy 9.43.3: Develop uniform care standards, with a focus on pruning that can be utilized by appropriate City departments.</li> <li>● Policy 9.43.4: Revise removal standards to address horticultural problems, afforestation, and reforestation.</li> </ul> <p>Though the General Plan was adopted over 20 years ago there is no visible evidence that these good ideas we indicated in bold are happening. We don't see wider sidewalks designed to accommodate large street trees. Urban Forestry's budget was cut in 2007 and never recovered. There is NO continuous canopy cover. Since 2001 DWP requires tree removals for potential staging.  <a href="https://www.youtube.com/watch?v=wJe_bAsx-48">https://www.youtube.com/watch?v=wJe_bAsx-48</a></p>	<p>2021). The comment indicates that LADWP requires tree removal for potential staging; however, as indicated in the video, LADWP requires approval from several agencies, including UFD, prior to removal. There are requirements, such as replacement, if the removal is approved. Further, the video indicates that LADWP may need to submit a variance to relocate staging areas and avoid tree removal. Therefore, LADWP does not require tree removals for potential staging if avoidable. Moreover, activities associated with LADWP's construction staging are outside the scope of the DREIR; please see Master Response No. 1 for comments outside the scope of the DREIR.</p>



Number	Comment	Response
	<p>[Refer to Appendix FEIR-B of this Final EIR, Letter 1, page 27, for the photos referenced in the comment.]</p> <p>The large canopy tree in the photo has to be removed, yet other cities do not have this preemptive tree removal policy.</p>	
P-1-25	<p>Developers are not required to plant front setback trees or street trees unless they are replacing trees they removed – and even then since 2016 they can pay a Tree Guarantee Fee (in lieu fee), and the TGF trees have not been planted in the last 2 years – the money just is accumulating. Developers are not required to enlarge tree wells into parkways, which is often a missed opportunity. There is no coordinated public works protocol. The City needs parkway enlargement and/or power line burial to plant large canopied trees, neither of which is happening. Hardscape changes for trees are just not in the purview of UFD, and BOE makes no special effort to create tree space. Existing vacant sites tend to be too small to accommodate large canopy trees. No improvements in maintenance – tree canopy is pruned away, agriperm that stifles trees is not removed, often causing trees to lift sidewalks to find water. Tree selection could be considered improved if it followed the Biodiversity directive of City Council (cited later in this letter) to plant native species trees, but the preponderance of tree selection is exotic and UFD rated itself a C on biodiversity when it was last required to review its practices. There is no evidence of revised removal standards to address horticultural problems as there is no holistic approach evident. If the City’s Urban Forestry Division were properly financed with percentages of the budget enjoyed in other cities, and the Planning Department as well as LADBS had robust tree attention to minimize tree removals and require large native planting, then the Sidewalk Repair Program’s tree removals would be less significant. With the City’s urban forest already in a state of trauma, the Sidewalk Repair Program is adding lacerations to an already bleeding victim.</p>	<p>This comment largely addresses issues beyond the scope of the Project and DREIR. Please see Master Response No. 1. To the extent that the comment is intended to comment on cumulative impacts, or the cumulative context, please see Master Response No. 4. The comment does not otherwise address environmental issues with respect to any issue discussed in the DREIR.</p>
P-1-26	<p>City of Los Angeles General Plan, Mobility Plan 2035 p. 3.4. Street Trees (No. MT.9): Implement a tree trimming cycle for all street trees within the public right-of-way. Use Priority Grading System to prioritize streets.</p>	<p>Land use consistency requirements were not required to be, nor were they, recirculated. Furthermore, this comment provides information, along with opinion, but does not raise an environmental issue analyzed under CEQA. Please see Master Response No. 1 for comments outside the scope of the DREIR.</p>

Number	Comment	Response
	<p>To date there is not a priority grading system to prioritize streets. In 2023 Crews came to prune trees in Valley Glen that had been pruned 9 years ago while other areas are on an 18 year pruning cycle. We had to ask not to prune so much because they would be reducing needed canopy, and this was accommodated – but it involved an intervention by a CFAC member. Presumably there is better record keeping with the Tree Inventory, but we have not seen a plan for areas that need attention, especially for important non-pruning activities like agriperm removal that can make a difference in the survival of a street tree. We did see more emergency tree service after the Tree Inventory began.</p>	
<p>P-1-27</p>	<p>City of Los Angeles General Plan, Mobility Plan 2035 EIR p. 3-6. The Department of Urban Forestry also has a goal to resolve conflicts between street trees and infrastructure so as to preserve the net benefits conferred by that segment of the urban forest on the remaining City infrastructure.</p> <p>Urban Forestry is not a “Department” but a “Division of Streets LA”. As a result it does not have the autonomy in its functioning and is supervised by a Department that does not have the staff expertise to create a more functioning environment for trees as in other cities such as Santa Monica. We don’t see the opportunity to try new approaches or even bring back old ones in which sidewalks could be diverted into the adjacent parking spot to give more room to a significant tree.</p> <p>There is an example at 13331 Berg St. in Sylmar that predates 2011 where sidewalk was diverted creating a bump-out to give a significant coast live oak tree more space and removing a parking space that was not needed, a creative solution that would be cost effective if the tree valuation tool was factored into the cost of this approach. (see Google Map photo below)</p> <p>[Refer to Appendix FEIR-B of this Final EIR, Letter 1, page 29, for the photos referenced in the comment.]</p>	<p>Land use consistency requirements were not required to be, nor were they, recirculated. Furthermore, this comment provides an opinion on the function of UFD and City administration; it does not pertain to environmental issues analyzed under CEQA. Please see Master Response No. 1 for comments that are outside the scope of the DREIR.</p>
<p>P-1-28</p>	<p>3.3.2. City of Los Angeles Bureau of Street Services 2015 State of the Street Trees Report.</p> <p>p. 3-7. However, due to funding limitations since 2008, the Bureau no longer plants street trees and has been limited to providing emergency response for the removal of dead, dying, or hazardous trees; pruning of foliage obstructing traffic control devices and</p>	<p>Please see Master Response No. 1 for comments that are outside the scope of the DREIR. Also, the comment provides an excerpt from the 2015 State of the Trees Report (City of Los Angeles 2015) and indicates a lack of funding to properly maintain trees. As stated on page 3-7 of the DREIR, the 2015 State of the Street Trees Report provided background information for the Bureau of Street Services’ management and assessment of street trees; it is</p>

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	<p>emergency response vehicles; and supervising a small amount of contract tree trimming. Without regular maintenance, the street tree population's condition is declining and poses a threat to the city's sustainability and resiliency.</p> <p>Urban Forestry's budget was further cut in the most recent budget cycle 2024-2025 fiscal year. There is no longer contract pruning to supervise, which was discontinued and brought in house after the 2015 report. What resources UFD has gets sent to emergency clearance and pruning, which actually reduces canopy given that the UFD crews trim aggressively due to the 18+ year average pruning cycle for street trees. The appropriate 7 year cycle would reduce the need for emergency responses and retain healthy canopy as long as pruning practices get modified accordingly. With more funding other types of maintenance like agriperm removal could be instituted and would contribute to the health of street trees.</p>	<p>no longer applicable to the current state of street trees. The bureau's strategic plan provides a better understanding of the goals for the future. Applicable goals of the strategic plan are provided on page 3-8 of the DREIR, including a partnership with City Plants, a contribution to the urban forest financing study for funding best management practices for tree care, and consideration of canopy expansion. Appendix A of the DREIR contains the policies set forth for the SRP, including those related to street tree canopy pruning.</p>
<p>P-1-29</p>	<p>3.3.3. City of Los Angeles Bureau of Street Services 5-Year Strategic Plan.</p> <p>p. 3.7-8. StreetsLA maintains approximately 700,000 sites, consisting of street trees, stumps, and vacant planting locations, and plants approximately 1,000 trees annually throughout the city under the mayor's Green New Deal (StreetsLA 2021).</p> <p>3.3.4. Green New Deal pLAn 2019.</p> <p>p. 3.8. In regard to street trees, the Green New Deal proposed to plant and maintain 90,000 trees citywide by 2021, which would provide 61.3 million square feet of shade at maturity. The following milestones and initiatives are proposed for the Green New Deal:</p> <ul style="list-style-type: none"> <li>● 2021 <ul style="list-style-type: none"> <li>Support the planting of 20,000 trees annually on residential and public properties <ul style="list-style-type: none"> <li>○ Identify and leverage state and federal funding to plant, preserve, and maintain an additional 4,000 trees annually</li> <li>○ Establish an adopt-a-canopy program to expand support for city trees</li> </ul> </li> </ul> </li> </ul> <p>p. 3.21. Green New Deal pLAn 2019 specifically includes the addition of 90,000 trees within the city, adding 61.3 million square feet of shade at maturity. These trees would be on private and public</p>	<p>The comment is in reference to the current mayor's commitment to the Green New Deal (City of Los Angeles 2019). Please see Master Response No. 1. It is beyond the scope of the DREIR to determine the current mayor's position on tree planting. As discussed in Master Response No. 4, cumulative impacts are evaluated on a programmatic level, which includes some degree of projection. This is consistent with CEQA.</p>

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	<p>land. The plan includes a component to preserve, maintain, and grow more protected tree species and policies to protect existing public and private trees, which would result in fewer trees being removed.</p> <p>p. 3.21. Even if no trees were replaced, the city would still see a net increase in the number of urban trees as a result of the trees proposed for planting in Green New Deal pLAn 2019 alone. Therefore, the proposed Project’s contribution to the significant cumulative biological resources impact would not be considerable, and cumulative impacts on biological resources would be less than significant.</p> <p>There has been no mention of the Green New Deal under the new Mayor, nor has she set any tree planting goals or visionary approaches for the urban forest. In fact, the opposite attitude has been voiced, as we have been told by the Sustainability Officer of Streets LA that housing has to take priority over trees. Mayor Bass has issued Revision 3 to her ED 1 that fastracks the building of housing without review, but this vague language does not give us any real assurance that trees are going to be significant:</p> <p>“The revision will create additional protections for existing residential tenants, ensure the protection of historic resources, create safeguards for projects in very high fire risk areas and industrial sites, and improve the design, landscaping, and open spaces of new affordable housing.”</p> <p>The majority of trees planted in the Green New Deal under the 63 previous Mayor tended to be smaller non-native trees. Tree giveaways were stalled in 2022 at City Plants awaiting DWP funding according to then Director Rachel O’Leary, and there are no follow up inspections on whether give-away trees actually got planted and thrived.</p>	
P-1-30	<p>3.4. Cumulative Impacts on Aesthetics.</p> <p>p. 3.17. The proposed Project would result in a net neutral street tree canopy as the replacement street trees reach maturity at Year 30 of the Project. This means that, at the end of the Project, the city will have a greater net ratio of street trees to urban canopy than it did before the Project started. Over the life of the Project, or the next 30</p>	<p>To the extent that the comment is intended to comment on cumulative impacts, or the cumulative context, please see Master Response No. 4. Neither aesthetic effects outside of the cumulative context nor heat-island effects are within the scope of issues evaluated in the DREIR, nor is the 2:1 ratio a part of the revised portions of the EIR addressed in the DREIR. Please see Master Response No. 1 for comments that are outside the scope of the DREIR.</p>

Number	Comment	Response
	<p>years, the city would have an increased number of street trees and a larger urban canopy than at the start of the Project. The urban forest would be enhanced by removing potentially diseased, dead, or damaged street trees. This citywide benefit would not damage or degrade recognized or valued views in adopted City land use plans; rather, the biodiversity of the urban forest would be considered and maintained by ensuring species of street trees are diverse and compatible with the streetscape and community.</p> <p>“We are not there to decorate, we are there to address and heal community pain.” -Accelerate Resilience Los Angeles  <a href="https://laurbanresearchcenter.org/wp-content/uploads/2021/02/LAUF-Equity-Assement-Report-February-2021.pdf">https://laurbanresearchcenter.org/wp-content/uploads/2021/02/LAUF-Equity-Assement-Report-February-2021.pdf</a></p> <p>p. 25. Unless budgets are increased to insure more tree care, there is no assurance that the newly-planted trees will fare any better than the ones that were removed. With increasing heat island effect in Los Angeles, tree survival is more challenging. and younger trees have a harder time surviving than mature trees. “How Urban Trees Can Save Lives.” The Nature Conservancy, 30 Oct. 2016  <a href="https://www.nature.org/en-us/what-we-do/our-insights/perspectives/how-urban-trees-can-save-lives/">https://www.nature.org/en-us/what-we-do/our-insights/perspectives/how-urban-trees-can-save-lives/</a></p> <p>The smaller canopy trees that are being planted for the most part will not produce more canopy, even with 2:1 replacement because the overall canopy volume is not being considered. Some diseased trees will be removed but also healthy trees are being removed under the caveat “as feasible.” Cited earlier were the healthy trees removed at 1508-1538 N Crescent Heights.</p> <p>Weather extremes and the prospect of continued global warming require us to understand the special care trees need in the event of drought.</p> <p>Drought stress develops in plants when the available soil water becomes limited. As this happens, young roots are killed outright, reducing the plant’s ability to absorb sufficient water.</p> <p>The soil also becomes hard and compact as it dries, reducing oxygen to the roots. If landscape plants (trees, shrubs, and ground covers, especially evergreen types) do not receive adequate rainfall or</p>	<p>The commenter states that additional budget and watering is required to ensure that replacement trees thrive and survive; however, increased heat will make it harder for young trees to survive. An article is cited; however, no evidence is mentioned in the comment, and the article does not appear to offer any further information on the survivability of replacement trees.</p> <p>The commenter also states that smaller trees will not result in increased canopy. As discussed in the DREIR, modeling was based on data from actual removals and replacements, which found that, at maturity, replacement trees would reach 62.6 percent of the removed tree canopy. The same modeling found that, after a reduction in overall canopy initially, the canopy would return to baseline conditions in Year 30. The comment does not raise any specific issue with this analysis or these conclusions.</p> <p>The commenter has provided a series of links to articles that discuss the tree canopy and the selection of the replacement trees. As noted above, the 2:1 ratio was not required to be addressed in the DREIR. Further, although the Equity Assessment Report (Los Angeles Urban Center 2021) asserts that current policies do not seem to be expanding the tree canopy at a pace that can keep up with their loss, this is not inconsistent with the data reported in the DREIR, which found that small temporary losses are anticipated (i.e., 0.3 percent loss of the street tree canopy or 0.1 percent loss the total tree canopy in the city). The canopy is expected to increase after Year 13 and fully recover after 30 years (see Section 2.2 of the DREIR). In addition, the commenter has provided a link to a Nature Conservancy Planting Healthy Air Report. Heat-island effects were not required to be, nor were they, included in the DREIR.</p> <p>The final link is to the Morton Arboretum page regarding drought. The comment has been considered. However, the monitoring and maintenance (including watering) were not required to be, nor are they, evaluated in the DREIR.</p> <p>With respect to the specific site identified in the comment, the largest tree-wells of 3-feet by 6-feet were installed in a fully cemented 7-foot-5-inch sidewalk. But directly adjacent to the site on Selma Avenue, the opportunity presented itself to plant multitude Coast live oak trees, in a 9-foot open parkway.</p> <p>The comment on the court ruling does not pertain to the environmental analysis in the DREIR; therefore, this requires no further response.</p>

Number	Comment	Response
	<p>supplemental watering, heavy plant loss is likely. Water trees and shrubs during extremely dry soil conditions.</p> <p><a href="https://mortonarb.org/plant-and-protect/tree-plant-care/plant-care-resources/drought-care/#:~:text=Depending%20on%20air%20temperatures%2C%20trees, every%20two%20to%20three%20weeks">https://mortonarb.org/plant-and-protect/tree-plant-care/plant-care-resources/drought-care/#:~:text=Depending%20on%20air%20temperatures%2C%20trees, every%20two%20to%20three%20weeks</a></p> <p>Los Angeles does experience drought, yet the Project is only allowing 3 years of watering for new trees, which is less than the required 5 years, or more if needed, of watering which is Urban Forestry’s policy for trees when they plant.</p> <p>p. 3-18. The cumulative projects described in Section 3.3, Summary of Cumulative Projects, would have varying biological effects on street trees and tree canopy. The City’s Framework Element provides a policy for “more but smaller size (e.g., 15 gallon) trees in lieu of fewer larger size (e.g., 24-inch box) trees” (City of Los Angeles 2001).</p> <p>Container size is no indication of the eventual size of the tree. In fact smaller container trees catch up in size to larger container trees, and the roots benefit from not spending as long growing in a container. The practice of using smaller container trees has no connection to the species being planted, larger or smaller, and box size is not related to the ultimate canopy cover.</p> <p>p. 3-20 . . . the City would follow all of its existing tree preservation policies, which would be enhanced by the Project, along with all applicable laws and regulations,</p> <p>The City’s current 2:1 tree replacement policy is outdated as it does not consider the volume of the canopy of the replacement trees at maturity and whether it will equal the canopy of the tree being removed. Given that the SRP tends to remove very large trees such as ficus and liquidambar, and that these species are not planted, the result from planting generally smaller trees does not give canopy equivalency even after the wait for the trees to grow:</p> <p>A few examples:  3644 S Bentley Av ficus replaced with Eastern redbud  6126 S Rimpau St shamel ash replaced with Australian willow  5865 W Olympic Bl eucalyptus replaced with Brisbane box</p>	<p>Notwithstanding, as provided in Section 1.3 and Appendix B of the DREIR, the court decision did not include an “injunction” to cease SRP tree removals. Please see Master Response No. 2 for further information regarding tree canopy and the assumptions made regarding the survival of replacement trees.</p>

Number	Comment	Response
	<p>8783 S. Dalton Ave liquidambar replaced with pink trumpet p. 3-21 The number of actual historic tree removals under the program in Years 1 to 7 (up to Fiscal Year 2022–2023, the last year to date) has been much less (i.e., on average, 110 trees removed annually) than the numbers presented in the EIR (i.e., 292 to 336 trees removed in Years 1 to 10). Further, the Project would result in the planting of 30,405 replacement trees, for a net increase of 17,544 trees. Thus, the Project would increase the available nesting, refuge, and foraging habitat for birds and other urban wildlife.</p> <p>As noted earlier, site visits to approved SRP rebate removal requests have found trees that have not been removed and the sidewalk not repaired. Another example is at 4513 Atoll where the huge tree was full of birds possibly nesting. Delay in removal may have been due to the bird or may have been affected by the CEQA judge’s injunction to cease SRP tree removals in 2023 or the rebate applicant has simply delayed effort to fix the sidewalk for whatever reason. Below is the 2022 Tree Removal Notification for this case followed June 2024 site visit photo of the Japanese black pine that has not been removed: [Refer to Appendix FEIR-B of this Final EIR, Letter 1, page 33-34, for the tree removal notice and photo referenced in the comment.]</p>	
P-1-31	<p>LAMC 62.104.1 Sidewalk Repair Program Street Tree Policy II. Street Tree Canopy Pruning p. 32. 3. Proper Canopy Thinning: (a) not more than 25 percent of the street tree’s foliage shall be removed; (b) sufficient branch structure should remain in the interior of the street tree; and (c) foliage shall be removed in a manner that leaves the street tree in symmetrical balance. p. 32. The UFD Chief Forester is the designated officer for purposes of ensuring sidewalk repair projects comply with this Policy. Pruning is happening under the SRP beyond the recommended ISA no more than 25% guideline. The photos below were taken at an SRP site on Oxnard in Valley Glen in June 2024 right after the sidewalk was repaired. The tree wells were enlarged as part of the project, which</p>	<p>The commenter has provided an example of a recent tree pruning that it states occurred as part of the SRP. However, it does not identify the address of the site. No specific issue is raised in relation to the DREIR. Please see Master Response No. 1 for comments outside the scope of the DREIR.</p>

Number	Comment	Response
	<p>was a positive, and root pruning was done. Some thinning was expected to reduce the wind resistance of the root-pruned trees from wind encounters. However the lower limbs of these Callery pear trees were pruned much higher than necessary for high profile vehicles with loss of shade, habitat, and street noise, visual and pollution buffering for the residents.</p> <p>[Refer to Appendix FEIR-B of this Final EIR, Letter 1, page 35-36, for the photos referenced in the comment.]</p>	
P-1-32	<p>We also find instances of this sort of thinning where there has not been root pruning, this resulting in unnecessary canopy loss. At this time there is no one at UFD with the title of Chief Forester, and there is no staff member with a degree in Urban Forestry. All high level staff work their way up from field work. We see overly-aggressive pruning attributed to longer pruning cycles. But some trees do not recover beneficial canopy for years, if at all. This causes further reduction to the City’s needed tree canopy.</p> <p>Business Improvement Districts and individual businesses very often over-prune for signage, and UFD does not have staff to cite these instances and take measures to avoid these practices in the future to prevent repeated harm to trees. The street tree jacarandas in Hollywood have not fully recovered their canopy from wholesale over- pruning several years ago by the BID. Sidewalk repair removals further diminish canopy that is already under siege and our analysis is that mitigation is inadequate and adds to an already deteriorating canopy situation.</p>	<p>The commenter provided a commentary on staffing and the qualifications of the staff at UFD. In addition, the commenter asserts claims regarding the pruning practices of business improvement districts. These are issues that are outside the scope of the DREIR. Regarding the pruning that would occur under the SRP, Appendix A of the DREIR contains the relevant guidelines. In relation to the loss of street tree canopy as discussed in the DREIR and in Master Response No. 2, it is noted that there would very likely be periods of canopy loss during the planning horizon of the SRP (0.3 percent loss of the street tree canopy or 0.1 percent loss the total tree canopy in the city); however, as discussed on page 2-2 of the DREIR, the canopy is expected to increase after Year 13 and fully recover after 30 years.</p>
P-1-33	<p>p. 33. Sidewalk Ramping: In public rights-of-way where continuous planting strips (parkways) exist with street trees, the reconstructed sidewalk may be placed on top of the root plate (ramped). Ramping requires enough linear space on each side of the highest point of the ramp to allow for a slope of no more than 5% and cross-slopes of 2%. Utilization of ramping may void the sidewalk warranty.</p> <p>Sidewalk ramping is used successfully in other cities such as Santa Monica. Can outside consultants be brought in to advise how to do this without voiding warranties and satisfy the necessary slope requirements? Replacing concrete with interlocking paver blocks or rubber pavers is a form of ramping described by Bartlett Tree Experts as a way to prolong</p>	<p>Ramping and other alternatives were not required to be, nor were they, recirculated. Please see Master Response No. 1 for comments outside the scope of the DREIR.</p> <p>The commenter is requesting that an outside consultant be retained to advise on ramping designs that would not void a sidewalk warranty. This pertains to a pending City Council motion and is outside the scope of the DREIR (see Master Response No. 1). Please note, as discussed in the 2021 EIR, sidewalk ramping would be allowed where continuous planting strips (parkways) exist with street trees. The reconstructed sidewalk may be placed on top of the root plate (ramped). This requires enough linear space on each side of the highest point of the ramp to allow a slope of no more than 5 percent and cross-slopes</p>



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	<p>the life of a mature tree and still repair the sidewalk.  <a href="https://www.bartlett.com/resources/technical-reports/sidewalk-repair-near-trees">https://www.bartlett.com/resources/technical-reports/sidewalk-repair-near-trees</a> (Download pdf – see 4.)</p> <p>p. 33. Meandering Sidewalk: In some locations, it may be possible to meander the sidewalk repair project around an existing street tree to allow additional room for root growth; however, if meandering requires an additional sidewalk dedication or easement, this would be beyond the scope of this Policy.</p> <p>City Council passed a motion 21-2469-S2 to investigate sidewalk repair alternatives. This from the motion in that Council File:</p> <p>“The City should deploy all available tools to improve the conditions of our sidewalks in the short- and long-term and should ensure it is making use of newer sidewalk repair methodologies which may have advantages over traditional asphalt spot repairs.”</p> <p><a href="https://clkrep.lacity.org/onlinedocs/2021/21-1469-S2_misc_9-20-23.pdf">https://clkrep.lacity.org/onlinedocs/2021/21-1469-S2_misc_9-20-23.pdf</a></p> <p>Meandering sidewalks that require an easement or additional sidewalk dedication alternative would become Code if needed for the preservation of a valuable tree that performs vital ecosystem services that are currently being studied regarding their importance to the health of our residents. The excuse of an existing Code is insufficient when Council has made a motion that could revise the Code. Also, this could be an opportunity to include bump-outs or bulb outs that divert the sidewalk into the parking space as part of the Code. Cost has been cited as an argument against this, but the tree-loss cost of a significant tree, which can be worth up to \$125,000 could make this approach attractive in view of saving heat-fighting canopy and raptor and other wildlife habitat. There are tree valuation tools that are used in other cities like Santa Monica to assess tree value. Efforts would have to be made to get LADOT on board with bulb-outs, but this approach has been done here in the past and is done in other cities.</p> <p>Another method that has not been explored that is used in Sacramento is steel diamond-patterned plates. This article has diagrams and photos on how to use them successfully:</p> <p><a href="https://fliphtml5.com/wxtg/tmrr/Western_Arborist_Fall_2022_Issue_FINAL_DRAFT/">https://fliphtml5.com/wxtg/tmrr/Western_Arborist_Fall_2022_Issue_FINAL_DRAFT/</a> p54.</p>	<p>of 2 percent. In addition, the City considered various alternatives (see Chapter 5 of the 2021 EIR), which include alternative designs and materials. Specifically, Alternatives 7 and 8 of the 2021 EIR consider meandering sidewalks.</p> <p>As discussed in Master Response No. 1, responses to comments are limited to those comments that are relevant to the DREIR.</p>

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P-1-34	<p>p. 33. Considerations for Street Tree Selection and Planting Location</p> <p>In general, street tree species selection at a given location shall be determined by the predominant street tree species on a block. . . The following areas shall be considered for street tree planting, in order of priority:</p> <ol style="list-style-type: none"> <li>1. The location of the removed street tree;</li> <li>2. Either side of the same street/block;</li> <li>3. The immediate street to the north, south, east, or west of the removed street tree location; -</li> <li>4. The neighborhood/community in which street tree removal(s) occurred (within 0.25 mile); and</li> <li>5. Historically low-canopy areas or areas with a high index rating of “heat island” or in areas of the City with poor air quality as determined by the South Coast Air Quality Management District, the California Office of Environmental Health Hazard Assessment, or the California EPA.</li> </ol> <p>This cited approach for tree selection does not take into account the Biodiversity Directive passed by City Council (City Council Agenda Item 21 CF 15-0499) in August of 2021 when it adopted the LASAN Biodiversity Report which prescribed the necessity for native planting in Los Angeles, a threatened Biodiversity Hotspot (see screen capture below)</p> <p>[Refer to Appendix FEIR-B of this Final EIR, Letter 1, page 39, for the screenshot referenced in the comment.]</p> <p>p. 2 of 25. The following additional Project objectives have also been identified:</p> <p>. . . If the removal of one or more street trees is required, ensure compliance with the City’s replacement requirements adopted to ensure no net street tree canopy loss at the end of the Project implementation period.</p> <p>p. 10 of 25. Regarding the maintenance period, the 3-year maintenance period is based on UFD’s historic experience with street trees (see 2015 Street Tree Policy, which sets forth the City’s historical experience with a 3-year maintenance period, which was adopted as part of the policy). Under the Project, the typical</p>	<p>Ramping and other alternatives were not required to be, nor were they, recirculated. Please see Master Response No. 1 for comments outside the scope of the DREIR. Notwithstanding, the biodiversity report, just as it was noted in the 2021 EIR, remains in the planning and guidance stage. Any policies and/or ordinances with mandatory components regarding biodiversity have not yet been adopted by the City; therefore, it is premature to formally consider them in this CEQA document.</p> <p>The commenter suggests that native trees are necessary to ensure biodiversity. Currently, more than 700 species of trees are found in the street tree inventory. As discussed in the DREIR, the Project will result in the removal of 1.9 percent of the baseline street trees. The loss of these trees, even before replacement, does not substantially change the biodiversity of the urban forest. Further, the DREIR references a study (Wood 2020) that found that birds were selective with respect to the trees in which they generally forage, favoring just a few native and non-native trees of the more than 700 species in the city.</p>

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	<p>maintenance period is further augmented by the 1:1 replacement component during the first 3 years, whereby the 3-year maintenance period would begin anew.</p> <p>If the project is to comply with the City’s replacement requirements, it needs to adhere to UFD’s updated policy of watering new trees for 5 years, not 3 years. If the Project is not budgeted to do this additional 2 years of watering, then the result will likely be saplings dying in the heat from lack of watering after the third year. UFD Chief Forester Tim Tyson, before he retired, about 5 years ago changed their UFD sapling tree care plan to always include 5 years of watering and longer if necessary.</p>	
<p>P-1-35</p>	<p>p. 15 of 25. Although native trees provide numerous benefits to wildlife and people, native trees are not necessarily feasible in all situations as street trees or even as trees in urban parks. In addition, large trees like coast live oak take up large amounts of space and have destructive roots. Smaller native trees that would be less destructive often have low branching patterns that are restrictive to pedestrian and vehicular travel. Therefore, for practical reasons, street streets cannot always be planted as native species that birds would prefer and therefore are not always ideal for bird use.</p> <p>p.34. Street Tree Selection Guide: The current guide lists 150 street tree species that may be considered for planting in the City.</p> <p>The Street Tree Selection Guide has less than 10 % native trees. <a href="https://streetsla.lacity.org/bss-ufd-street-tree-selection-guide">https://streetsla.lacity.org/bss-ufd-street-tree-selection-guide</a> UFD has been resistant to trying species they are not familiar with. A proposed pilot program suggested by UFD to try some of these native trees, selected by CFAC members with native tree experience, has not received UFD support to go forward. Unless UFD’s position changes, hardscape changes are needed to accommodate the native trees they do approve, but for which UFD requires more planting space: coast live oak, California sycamore, Valley oak. Again it is important to work with LADOT and institute bulb outs, in this case for planting new larger trees.</p>	<p>Replacement tree requirements were not required to be, nor were they, recirculated. Please see Master Response No. 1 for comments outside the scope of the DREIR.</p> <p>One purpose of the revised street tree policy is to provide a diverse street tree population. As identified in Appendix A of the DREIR, there are considerations for street tree selection. These policy guidelines are intended to foster success.</p> <p>When street tree removal cannot be avoided, it is the intent of the SRP to replace street trees using the Considerations for Street Tree Selection and Planting Location in the Street Tree Policy. The SRP also aims to focus on increasing biodiversity rather than promoting aesthetic uniformity, where possible, in order “[t]o have a mixed-age tree population, adequate species diversity, and an appropriate mix of street tree types to provide a diverse urban forest ecosystem that is able to adapt to changing environmental pressures, such as disease, pest infestation, climate, etc.” It is also the intent of the SRP to identify street trees that have varied forms, textures, structures, flowering characteristics, and other aesthetic benefits to enhance the types of street environments found in the city. UFD will select street tree species from one of approximately 150 options listed in its Street Tree Selection Guide (Appendix B4 of the 2021 EIR), which is currently undergoing an update, and will make efforts to plant native trees where appropriate. However, as discussed in the DREIR, if the existing street tree well location or size is not suitable for a native tree, a UFD-acceptable street tree species would be planted. The chief forester of the UFD shall be consulted during all tree replacements and pruning. Selections for replacements will be made on a case-by-case basis, taking into account specific factors at any given location.</p>

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		<p>Some of these factors include the need for drought-tolerant species, the need for native or other species that support local wildlife, the viability of species at a specific location, and the amount of space available.</p> <p>The 2021 EIR contains several alternatives, some of which considered the use of bulb-outs. Please refer to Chapter 5 of the 2021 EIR. When appropriate, the City will work with the Los Angeles Department of Transportation (LADOT). As noted in Master Response No. 1, responses are not required for issues not evaluated in this DREIR; no further response is required.</p>
P-1-36	<p>p. 35. Monitoring: For the first three years of planting, replacement street trees shall be maintained and monitored for growth under the direction of UFD through visual inspections at the time when street trees are manually watered 33 times per year for three years. Young street trees that do not survive in the first 3 years must be replaced at a 1:1 ratio. The young street, trees must be able to withstand slight to moderate drought or other stress.</p> <p>Appendix D, p. 10 of 25. Regarding the maintenance period, the 3-year maintenance period is based on UFD’s historic experience with street trees (see 2015 Street Tree Policy, which sets forth the City’s historical experience with a 3-year maintenance period, which was adopted as part of the policy). Under the Project, the typical maintenance period is further augmented by the 1:1 replacement component during the first 3 years, whereby the 3-year maintenance period would begin anew.</p> <p>If the Project is only budgeted for 3 years of watering, it is not compliant with the current UFD procedure of 5 years of monitoring and watering. If this is not corrected, given the heat that Los Angeles experiences, there will be costly tree failure. Of course if no one is monitoring beyond 3 years, the tree failures may not result even in 1:1 replacements and canopy will further decrease such that instead of a replacement tree only mitigating part of the removed tree canopy, there may be no canopy added to try to compensate for the removed tree.</p>	<p>Replacement tree maintenance and monitoring requirements were not required to be, nor were they, recirculated. Please see Master Response No. 1 for comments outside the scope of the DREIR.</p> <p>The Street Tree Policy states that “the first three years of planting, replacement street trees shall be maintained and monitored for growth under the direction of UFD through visual inspections at the time when street trees are manually watered 33 times per year for three years. Young street trees that do not survive in the first 3 years must be replaced at a 1:1 ratio. The young street, trees must be able to withstand slight to moderate drought or other stress.”</p> <p>The UFD currently does not have a policy of 5 years of monitoring and watering. The most recent Los Angeles Tree Trimming and Maintenance Audit (Mejia 2023) states that “Forest managers indicate that many trees die if they are not watered properly the first three to five years.” Moreover, it is the recommendation of UFD that residents water newly planted street trees for 3 to 5 years; 5 years is not an adopted policy.</p>

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P-1-37	<p>LAMC 62.104.1 Sidewalk Repair Program Mandatory Project Features Policy p. 1 of 7. A nesting bird survey shall be submitted at the conclusion of the site survey.</p> <p>Given that the objections that disqualified the EIR were primarily bird-related, this nesting survey by a qualified biologist needs to be made available to the public. When a tree is felled, neighbors get upset when they see birds nests disrupted. Because this is a violation of a federal law, local enforcement is challenging. It should be required that this survey be available to the public. Very dense ficus trees were removed from 1508-1538 N Crescent Heights during the 2024 spring nesting season, and it would be interesting to verify how it was determined that there were no active nests in these dense canopy trees.</p>	<p>Nesting bird surveys are available to the public pursuant to the California Public Records Act, unless they fall within an applicable exception. Nonetheless, this comment is outside the scope of the DREIR. Please see Master Response No. 1.</p> <p>As outlined in Appendix A, the Project is subject to the Migratory Bird Treaty Act. Under limited circumstances, the U.S. Fish and Wildlife Service (USFWS) may issue permits to take active nests when a particular nest causes human health or safety concerns or when birds are in immediate danger. The individual example that the commenter provided is outside the scope of this DREIR.</p> <p>Generally, nesting surveys are informational and not publicly posted; however, they can, like all public documents, be requested from the City. Methodologies for nesting bird surveys vary but generally include a qualified biologist walking, scanning, and watching avian behavior while in search of a nest or nesting behavior. If a nest is identified, attempts are made to determine the nest stage and then identify the next steps to avoid impacts on the nest.</p> <p>As stated in the DREIR, PDF-BIO-3 would ensure that a survey is conducted to search for nesting birds, including raptors and bats. If active nests are identified, they would be protected with a non-disturbance buffer, and the nest would be avoided until the nest is no longer active. As a result, no direct impacts on avian species, including common species, are expected.</p> <p>Please see response P-1-30 regarding the specific trees referenced in this comment..</p>
P-1-38	<p>When City Council adopted the Biodiversity Report in August 2021 CF 15-0499, they included a directive to all City Departments to work with the Biodiversity Expert Council to change their practices to enhance biodiversity practices. From the City Council Energy and Environment Agenda August 18.2021:</p> <ol style="list-style-type: none"> <li>1. INSTRUCT the Bureau of Sanitation (BOS) to: <ol style="list-style-type: none"> <li>a. Report back regularly on progress on biodiversity initiatives.</li> <li>b. Continue to lead and work Recommendations for Council action: work with the Biodiversity Expert Council, the Biodiversity Interdepartmental Team, and the Biodiversity Stakeholders in order to complete the first baseline measurement of the LA City Biodiversity Index.</li> </ol> </li> </ol>	<p>This comment is outside the scope of the DREIR; please see Master Response No. 1. Please also see responses to comments P-1-34 and P-1-35.</p>

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	<ul style="list-style-type: none"> <li>c. Continue to seek funding for biodiversity initiatives and pilot projects.</li> <li>d. Work with the Biodiversity Teams to consult with both the Climate Emergency Mobilization Office and the Civil and Human Rights and Equity Department and report back more robustly on biodiversity equity and access to nature, as per the original biodiversity motion. Perhaps forming a Biodiversity Equity Expert Group might be in order.</li> </ul> <p>2. INSTRUCT the BOS and the Biodiversity Interdepartmental Team departments, and the City proprietaries, Los Angeles Department of Water and Power (LADWP), Port of Los Angeles, and Los Angeles World Airports, to:</p> <ul style="list-style-type: none"> <li>a. Report with the creation of department-specific biodiversity plans, including how each department intersects with native biodiversity issues, how to protect and enhance native biodiversity in City department operations and areas over which the City has oversight, and for them to include recommendations for a percentage improvement per department each year until we achieve a “no biodiversity loss” goal as soon as possible.</li> <li>b. Study and report with Planning in the lead, on how to educate the City, builders, and the public about the problem of bird-building collisions and recommendations on how to avoid them. Include an examination of best practices around the country: the Congressional Bird-Safe Buildings Act, what they are doing to avoid them in New York City, Chicago, San Francisco, San Jose and other cities, and what the City needs to do to adopt bird-safe building standards measures.</li> <li>c. Study and report with the Department of Recreation and Parks in the lead, on how to adopt the Audubon Cooperative Sanctuary Program for all City golf courses.</li> <li>d. Study and report, with all the biodiversity teams, on recommendations for how to integrate biophilic (aka, nature-centered) design into City projects, development projects citywide, and city-scale planning, and to report on</li> </ul>	

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	<p>the health and environmental and economic benefits of biophilic design for building occupants and urban environments.</p> <p>3. INSTRUCT the Department of Public Works to work with the Chief Legislative Analyst (CLA), and City Administrative Officer (CAO), and report on the very apparent need the City departments have for a full-time Urban Ecologist, including the time Kat Superfisky spent working with BOS, the LA River team, LADWP, the City Forest Officer, and on other important environmental Planning issues besides the wildlife corridors, and the funding and process for creating a permanent Urban Ecologist position, similar to the City’s Forest Officer.</p> <p>4. INSTRUCT the BOS to include in the next report the C40 Cities Urban Nature Declaration recently signed by the Mayor, for Council’s examination and formal adoption.</p> <p>5. DIRECT the CLA and CAO to figure out how to access the funding set aside by Governor Newsom, particularly for the ready-pilots, inclusion of a grant writer, and better resource on the overall effort.</p> <p>Fiscal Impact Statement: The BOS reports that they will continue to work with the Biodiversity Expert Council, the Biodiversity Interdepartmental team, the Biodiversity Stakeholders, and students from local universities to advance biodiversity assessments and research in the field. BOS is not requesting any additional funding for biodiversity during Fiscal Year 2021-22. Neither the CAO nor the CLA has completed a financial analysis of this report.</p> <p>Community Impact Statement: Yes</p> <p>For: Northwest San Pedro Neighborhood Council Wilmington Neighborhood Council Bel Air-Beverly Crest Neighborhood Council</p> <p>Yet when Urban Forestry self-evaluated their biodiversity progress in LASAN’s first report back in 2022, they gave themselves a letter grade C.</p> <p><a href="https://clkrep.lacity.org/online/docs/2015/15-0499_rpt_BOS_10-14-22.pdf">https://clkrep.lacity.org/online/docs/2015/15-0499_rpt_BOS_10-14-22.pdf</a> pp. 284-285.</p>	

Number	Comment	Response
	<p>Where is the commitment to biodiversity in the Sidewalk Repair Project that is under City Departments (BOE and Streets LA) that were instructed by City Council to follow the recommendations by the LASAN Biodiversity Report to overcome our deficit by planting native trees and plants?</p>	
<p>P-1-39</p>	<p>The City Council directive included Urban Forestry and BOE which should not resort to a “can’t do” approach. Since the Project is already doing hardscape construction, this should be an opportunity to create both maximum canopy and enhanced biodiversity by creating space for large canopy trees, both existing and newly-planted. If the City is discouraging car usage, then assigning a parking space for a tree should be in accord with City policy. These curb extensions have value for pedestrian safety: Curb Extensions   National Association of City Transportation Officials Here is an example in Covington, KY: <a href="https://www.udstudio.org/stories/bumpouts-and-big-ideas">https://www.udstudio.org/stories/bumpouts-and-big-ideas</a> [Refer to Appendix FEIR-B of this Final EIR, Letter 1, page 43-46, for the screenshots referenced in the comment.]</p>	<p>Alternative designs were discussed and evaluated in the 2021 EIR (Chapter 5). As discussed in Master Response No. 1, responses herein are limited to those issues that were recirculated in the DREIR. No further response is required.</p>
<p>P-1-40</p>	<p>In Los Angeles the tree wells could be wider to let in more ground water when we do get rain. This approach is corroborated by the experts at the Urban Research Center: <b>Reclaiming the Right-Of-Way</b> Across the board, interviewees were consistently discussing the ‘public right of way’ as an issue of equity. Even if most of the LA region is privately owned, public spaces play an essential role in supporting the expansion of tree canopy. Yet, those neighborhoods that have been historically marginalized from funding and/or disinvested in other forms can have narrow parkway areas, and limited spaces for expanding canopy. The amount of space dedicated to vehicles has only grown over time, adding to the challenge of finding suitable planting spaces. This work is further complicated by the fact the multiple agencies govern the public right of way. The 2015 settlement to commit \$1.4 billion over 30 years to make sidewalks compliant to ADA standards, provokes serious consideration about the role of trees in the public right of</p>	<p>Alternative designs were discussed and evaluated in the 2021EIR (Chapter 5). As discussed in Master Response No. 1, responses herein are limited to those issues that were recirculated in the DREIR. No further response is required.</p>



Number	Comment	Response
	<p>way. Some trees can damage sidewalks, and are often removed as a result. As noted by members of the LA Urban Design Team, “For the majority of projects we see, we have limited ability to encourage more trees.” As such, the capacity for expanding tree canopy, particularly in areas with limited canopy will require creative approaches.</p> <p>Some cities have experimented with removing concrete and widening sidewalks, which allow for larger tree wells; others have integrated safety measures, such as curb ‘bump outs’ or extensions to allow for trees. Recently, the COVID- pandemic indicates that many restaurants are occupying public right-of-way and streets for increasing spaces available for physical distancing. If we can cede areas to private businesses, then perhaps similar approaches can be taken for expanding tree canopy. Such an idea was expressed by another member of the LA Urban Design team, who noted, “If we could cede more parkway space for trees, and less for cars, that would be a huge win for the city.” To address challenges from community members, such programs could be coupled with innovations that increase the experience of ownership among neighboring residents. A couple of such programs might consider: Levers and/or incentives that support a favorable water rate or subsidy for qualifying households and which would contribute to infrastructure improvements for accommodating trees; <a href="https://laurbanresearchcenter.org/wp-content/uploads/2021/02/LAUF-Equity-Assement-Report-February-2021.pdf">https://laurbanresearchcenter.org/wp-content/uploads/2021/02/LAUF-Equity-Assement-Report-February-2021.pdf</a> p. 37</p> <p>What trees there are in these areas are even more critical for the health of the residents. “How Urban Trees Can Save Lives.” The Nature Conservancy, 30 Oct. 2016, <a href="http://www.nature.org/en-us/what-we-do/our-insights/perspectives/how-urban-trees-can-save-lives/?src=r.global.healthyair">www.nature.org/en-us/what-we-do/our-insights/perspectives/how-urban-trees-can-save-lives/?src=r.global.healthyair</a>.</p>	
P-1-41	<p>Bump-outs are listed as not cost effective on every tree removal notice, but it is unlikely that the value of the tree or the value of the tree’s health service to the community or the tree’s benefits to wildlife, or its utility bill savings, or pedestrian comfort (on foot or wheelchairs) that encourage leaving the car at home are calculated in this sweeping dismissal.</p>	<p>The commenter raises questions regarding the financial infeasibility of bump-outs in comparison to the value of the tree, tree health, and benefits. As discussed in Master Response No. 1, it is beyond the scope of the DREIR to conduct a cost-benefit analysis. No further response is required.</p>

Number	Comment	Response
P-1-42	<p>Also, C40 Cities Urban Nature Declaration, which Los Angeles signed onto, needs to be a consideration in the functioning of UFD. This is the C40 recommendation for trees; yet embarrassingly, our canopy continues to decline:  <a href="https://www.c40knowledgehub.org/s/article/Heat-How-to-expand-your-city-s-tree-canopy-cover?language=en_US">https://www.c40knowledgehub.org/s/article/Heat-How-to-expand-your-city-s-tree-canopy-cover?language=en_US</a></p>	<p>The commenter notes that C40 Cities’ Urban Nature Declaration needs to be considered with respect to the functioning of UFD. It is beyond the scope of this DREIR to examine the entirety of UFD’s operations. In addition, the commenter provides a link to information regarding the relationship between tree canopy and climate risks, along with options and benefits for tree canopies. As discussed in Master Response No. 2, the canopy is expected to increase after Year 13 and fully recover after 30 years. As discussed in Master Response No. 1, responses herein are limited to those issues that were recirculated in the DREIR.</p>
P-1-43	<p>The project keeps track of metrics, but where is the photo record of what was lost and progress of the trees that are supposed to mitigate the loss? Without this monitoring for the survival of the replacement trees planted, there is no way to know if the Project is creating net loss rather than gain for the City’s overall tree situation. Beyond ensuring there are no mistakes in the execution of the Project’s approach to trees, the Project could provide a net gain if it enhanced shade and biodiversity in its planting practices. To halt its downsizing of the urban forest, the Project needs to be planting very large trees, and to do this it needs to create large planting areas for oaks, sycamores and even potentially California bay and black walnut trees where appropriate. The Project would then truly be an asset beyond its obligation to the population with physical disabilities, as it would avoid hurting those that suffer from respiratory afflictions and sensitivity to the heat. We would like to see the Project as a win-win, and to do so it needs to be proactive in providing greater good for the urban forest as it minimizes removals with new untried-in-Los Angeles approaches and planting with a commitment to biodiversity and ensuring benefits for both wildlife and human inhabitants of Los Angeles.</p>	<p>Canopy analyses and monitoring, besides those related to short-term impacts, were not required to be, nor were they, recirculated. Please see Master Response No. 1 for comments outside the scope of the DREIR.  Please also see Master Response No. 2, which discusses tree canopy and tree selection, and monitoring.  As outlined in Appendix A of the DREIR, for the first 3 years of planting, replacement street trees shall be maintained and monitored for growth under the direction of UFD through visual inspections at the time when street trees are manually watered (i.e., 33 times per year for 3 years). Young street trees that do not survive in the first 3 years must be replaced at a 1:1 ratio. The young street trees must, turn, be able to withstand slight to moderate drought or other stress. The monitoring and enforcement provisions already included will ensure the effectiveness of the program.  The commenter asserts that the SRP needs to plant very large trees to halt downsizing of the urban forest. Where appropriate, larger species may be planted, but this may not be appropriate for each tree planting. Even with the planting of the smaller varieties that are on the UFD Street Tree Selection Guide, the SRP projects that the tree canopy will fully recover after 30 years. Conversely, the planting of larger trees in areas that are not appropriate could result in tree mortality, which would not benefit the canopy.</p>
<b>O-2: Streets for All</b>		
O-2-1	<p>I am reaching out because i have some questions about the city sidewalk repair program. Do you have time for a quick phone call? Or zoom meeting?</p>	<p>This comment does not pertain to environmental issues analyzed under CEQA. The commenter requests a meeting with the City. No further response is required.</p>

Number	Comment	Response
<b>O-3: Urban Growth Advocates</b>		
O-3-1	<p>I reviewed the DEIR for the Sidewalk Repair Program (SCH No. 2017071063). However, the report is still missing a key point: the Sidewalk Material, meaning— total Lack of Pavers. This is absolutely shameful, as the current state of sidewalks citywide is awful and utilitarian, at best, -- due to the prevalence of naked concrete, with no decorative pavers practically anywhere. Hence our walkability suffers significantly!</p>	<p>The 2021 EIR presented a wide range of potential alternatives that were initially considered, including the use of suggested alternative designs and materials, such as modular pavers. This is discussed in both Chapter 5 of the 2021 EIR and Master Response No. 2 of the Final EIR. As this comment is outside the scope of the DREIR. Please see Master Response No. 1 for comments outside the scope of the DREIR.</p>
O-3-2	<p>It is absolutely imperative that the installation of Pavers is included in the Sidewalk Repair Program, as opposed to continuing with our city's standard "Naked Concrete Sidewalk". Most sidewalks across the city, as I'm sure you agree, are too gloomy and uninviting -- as they're covered with utilitarian &amp; primitive concrete &amp; cement, with no decorative pavement. As a result, L.A. remains one massive "Concrete Jungle" -- due to the prevalence of endless concrete &amp; cement! Which is truly shameful. Sadly, most new developments continue to utilize hideous plain-concrete sidewalks, -- which offer zero aesthetics. This severely affects walkability and pedestrian-oriented streetscape. In most U.S. cities, however, sidewalks have much better covering than most of L.A. does. Even in San Diego, Santa Barbara, Glendale, Pasadena, etc. -- you see much more attractive sidewalk pavement than in L.A.; hence more pedestrian activity on city streets! Thankfully, some parts of L.A. (incl. Downtown, the Sunset Strip, mid Wilshire area, etc.) started using decorative pavers.</p> <p>In order to promote walkability and improve the aesthetics in L.A. County, a major improvement to sidewalks is needed. Besides, pavers have a major advantage: unlike naked concrete, pavers are much more stain-resistant, thus require less maintenance, -- becoming a more cost-effective solution in the long run.</p> <p>Therefore, I strongly recommend that "Decorative Pavers" are added as a new Design Guideline standard in the City of L.A. -- and also to be added this program. It is time to give our sidewalks a much needed aesthetical improvement!</p>	<p>The 2021 EIR presented a wide range of potential alternatives that were initially considered, including the use of suggested alternative designs and materials, such as modular pavers. This is discussed in both Chapter 5 of the 2021 EIR and Master Response No. 2 of the Final EIR. It is outside the scope of this SRP and the DREIR to determine what should be added to the City's design guidelines. Please see Master Response No. 1 for comments outside the scope of the DREIR.</p>

Number	Comment	Response
<b>O-4: Pico NC Sustainability Transportation, and Mobility Standing Committee</b>		
O-4-1	<p>It's nice to e-meet you and I hope this email finds you well. I am the Co-Chair of the PICO NC Sustainability, Transportation, and Mobility Standing Committee and Chelsea, copied above, is on the Committee as well.</p> <p>Our standing committee was asked to look at the draft EIR. And, in so doing, we were interested to know more about how replacement trees for any trees that are determined to be upreservable are decided on. Can you tell us:</p> <p>(1) Are native trees prioritized? and</p> <p>(2) What is the process for selection, planting, and maintaining replacement trees?</p> <p>Thank you! We appreciate the additional information.</p>	<p>Replacement tree requirements were not required to be, nor were they, recirculated. Please see Master Response No. 1 for comments outside the scope of the DREIR and Master Response No. 2.</p> <p>As stated in the DREIR, Section 2.2, native trees may be used when determined appropriate and feasible for the growth space and area. Also, Appendix A of the DREIR outlines the parameters for the consideration for street trees and maintenance guidelines. The selection of street trees will be guided by climate, growing space, and the types of trees already on the street. The street tree selection guide has a list of 150 street tree species that may be considered for planting. Moreover, specifications for maintenance are contained in Appendix A. Replacement trees shall be monitored for 3 years; trees that do not survive in the first 3 years shall be replaced on a 1:1 ratio.</p>
<b>O-5: Arts District Council Los Angeles</b>		
O-5-1	<p>The Recirculated EIR acknowledges minimal improvements but fails to adequately address critical concerns related to biological resources, specifically impacting bird species and tree canopy cover. As outlined in the court's assessment, there are glaring deficiencies that require urgent attention:</p> <p>1. Impact on Tree Canopy and Species Diversity: The replacement ratio proposed (2:1 or 3:1) for trees removed under the Sidewalk Repair Program (SRP) is commendable on paper. However, the effectiveness of this ratio hinges on the type and matured size of replacement trees. The current trend favoring small, decorative species like Crape Myrtle and Mexican Fan Palm are not native and do not provide equivalent canopy cover compared to trees such as Indian Laurel Fig or Camphor. This discrepancy is critical as it directly affects habitat quality for both common and special status bird species, particularly raptors like red-tailed hawks, which rely on tall trees for nesting.</p>	<p>It was determined that the 2021 EIR inadequately evaluated short-term impacts on the tree canopy. This comment is, in part, related to the long-term canopy and replacement trees, issues that were not required to be, nor were they, recirculated. As discussed in Master Response No. 1, comments that are beyond the scope of the DREIR do not require a response. However, for informational purposes, this document contains a Master Response in relation to tree canopy; please see Master Response No. 2. With respect to habitat for species, please see Master Response No. 3.</p>
O-5-2:	<p>2. Cumulative Impacts Assessment: The REIR's evaluation of cumulative impacts on biological resources lacks credibility due to its reliance on outdated and insufficient data sources. While documents such as the Green New Deal aspire to increase tree planting, there is no evidence of actual implementation or impact</p>	<p>Please see Master Response No. 4 regarding the cumulative impact analysis.</p>

Number	Comment	Response
	<p>on LA’s urban forest. Other cited documents provide only generalized assessments, failing to offer specific data crucial for evaluating the true cumulative impacts of the SRP over its 30-year lifespan.</p> <p>A. The effects of urban deforestation include soil erosion and coastal flooding which we are witnessing throughout LA County today.</p>	
O-5-3	<p>3. Human Impacts: The loss of trees in urban and rural areas exacerbate air pollution, urban heat island effects, and the spread of vector-borne diseases, with negative consequences for human health and well-being.</p> <p>We are witnessing in real time decreases in the health and quality of life due to these indiscriminate tree removals. Urban trees protect our cities from the effects of storms and intense heat waves, creating more resilient cities in the process. Not to mention that they actively sequester carbon dioxide and pollution.</p>	<p>There have been no revisions to the analyses regarding air pollution, urban heat-island effects, vector-borne diseases, human health, climate change, and climate change/weather resilience; these topics are beyond the scope of the DREIR. Please see Master Response No. 1 for responses to comments that are outside the scope of the DREIR. In addition, as stated on page 2-5 of the DREIR, when replacement cannot occur in the general area where a tree was removed, the tree will be placed in historically low-canopy areas with a high heat-island index or areas of the city with poor air quality, as determined by SCAQMD, the California Office of Environmental Health Hazard Assessment, or the California Environmental Protection Agency. This would have a positive effect on the existing habitat in low-income communities where low-canopy areas with a high heat-island index are more likely to occur.</p>
O-5-4	<p>4. Data Transparency and Accountability: Transparency regarding tree planting initiatives under the Green New Deal and other urban forestry plans is sorely lacking. Without accurate data on tree planting rates, maintenance plans and species distribution, claims of net canopy gain are unsubstantiated and are shown to be clearly false based on satellite data available to the public. The community deserves a clearer understanding of how the SRP will truly impact our environment and wildlife.</p> <p>Despite years of requests, the city has been unable to produce any data on the condition of tree canopy in the city. As of this writing, hundreds of trees have been removed in the name of brush clearance. These removals have been done at night where communities cannot protest.</p>	<p>The proposed Project concerns primarily sidewalk repairs. Although the DREIR evaluates impacts on trees, an accounting regarding the trees or tree canopy in the city, as well as the impacts of brush clearance, is not part of the proposed Project. Further, canopy analyses, besides short-term impacts, were not required to be, nor were they, recirculated. Please see Master Response No. 1 for comments that are outside the scope of the DREIR and Master Response No. 2 for information on tree canopy and monitoring.</p> <p>As outlined in Appendix A of the DREIR, for the first 3 years of planting, replacement street trees shall be maintained and monitored for growth under the direction of UFD through visual inspections at the time when street trees are manually watered (i.e., 33 times per year for 3 years). Young street trees that do not survive in the first 3 years must be replaced at a 1:1 ratio. The young street trees must be able to withstand slight to moderate drought or other stress.</p> <p>For informational purposes, as part of the City’s effort to update the tree inventory, the City has developed the TreeKeeper database, which allows users to select search parameters for a geographic area.</p>

Number	Comment	Response
		Brush clearance is not part of the Project; therefore, no response is needed. Please see Master Response No. 1 for comments that are outside the scope of the DREIR.
O-5-5	Additionally, Urban Forestry, under Public Works and The Mayor’s Office, has failed repeatedly to inform communities of these removals, and when called out, fail to respond to requests for copies of orders, the number of tree removals annually, the number of trees planted annually, maintenance schedules, etc. To date, no documents have been produced.	Please see response O-5-4 regarding the scope of the Project and Master Response No. 1 regarding the scope of comments. The commenter indicates that requests for tree data have not been answered and that the communities are not informed of tree removals. It is outside the scope of this DREIR to address past requests for tree data or respond to concerns regarding the alleged lack of community notification in the past. As outlined in Appendix A of the DREIR, the Project has a clear protocol for community notification.
O-5-6	While the City’s efforts to mitigate environmental impacts are noted, the current iteration of the Sidewalk Repair Ordinance, as detailed in the REIR, falls short of addressing critical concerns regarding tree canopy loss and habitat preservation and continues to give the City blanket authority to remove trees while they violate their own mandates, inclusive of the City’s own tree Ordinances all the while doing so in the midst of an extinction event. This must stop.	Please see Master Responses 2 and 3 regarding impacts on tree canopy and species habitat. Although the SRP does create a streamlined process for ministerially approving actions, including tree removals, to implement the mandates of the <i>Willits</i> Settlement, it does not give blanket authority to remove trees. The guidelines are provided in Appendix A of the DREIR.
O-5-7:	It further goes against the State and Federal Govt’s 30/30 plans which calls for the total retention of existing mature trees in addition adding new native trees. The City continues to abuse its discretionary authority and as such, that authority should be removed.	The 30/30 conservation plan is a comprehensive initiative that aims to protect and conserve 30% of U.S. lands and waters by 2030. This plan is part of a larger movement to safeguard natural habitats and biodiversity. While the plan seeks to protect and restore natural habitats, it does not require the total retention of mature trees. Instead, it focuses on sustainable management of working lands and the expansion of public lands to hunting and fishing areas. This comment misconstrues efforts by the State of California (State) and federal government to achieve the goal of preserving 30 percent of our natural lands and coastal waters by 2030. Nothing in the State’s plans to date suggests prohibiting the removal of mature landscape trees (see <i>Pathways to 30x30</i> , dated April 22, 2022). The Project promotes the retention of healthy mature trees, where feasible; where infeasible, the Project included the planting of native trees at a ratio that would maintain biodiversity over the long term. Further, this issue could have been raised at the time of the original EIR; it is not an issue for this REIR. Please also see Master Response No. 1 for comments outside the scope of the DREIR and Master Response No. 2 regarding the selection of replacement trees.

Number	Comment	Response
O-5-8:	<p>Communities like the Skid Row and the Arts District have recorded 140 degree temperatures on the unprotected sidewalks and still must battle the City to retain the trees we have. In the last 15 years, approximately 180 trees were planted both via community and developers. We have lost easily 100 trees due to the wrong trees being planted, lack of care, and other issues.</p> <p>Below is a view of the only canopies in each community:            Skid Row: Note, trees only at General Jeff Park and Hippie Kitchen [Refer to Appendix FEIR-B of this Final EIR, Letter 5, page 3, for the screenshot referenced in the comment.]            The Arts District: Note the only functioning tree canopy sits over the bar, Resident, along with the stretch near Urth Café. [Refer to Appendix FEIR-B of this Final EIR, Letter 5, page 4, for the screenshot referenced in the comment.]            The disparity of green space (trees) between the wealthy and the poor is hard to miss in this visual in West Los Angeles below: [Refer to Appendix FEIR-B of this Final EIR, Letter 5, page 4, for the screenshot referenced in the comment.]</p>	<p>Tree loss issues in Skid Row and the Arts District were not required to be, nor were they, recirculated. Please see Master Response No. 1.</p> <p>The commenter is expressing a belief that there is disparity between the number of trees planted in low- and high-income areas. This is consistent with the analysis in the DREIR. As discussed on pages 2-5, in part, the SRP addresses this by proposing that, when tree replacement cannot occur in the general area where a tree was removed, the tree would be placed in historically low-canopy areas with a high heat-island index or areas of the city with poor air quality, as determined by SCAQMD, the California Office of Environmental Health Hazard Assessment, or the California Environmental Protection Agency. This would have a positive effect on the existing habitat in low-income communities where low-canopy areas with a high heat-island index are more likely to occur.</p> <p>It is also recognized that there are instances of incorrect trees being planted, thereby affecting the tree survival rate. Appendix A of the DREIR outlines the considerations for tree planting, including matching the appropriate tree to the climate. Further, Appendix A provides the guidelines for the monitoring and maintenance of street trees. The SRP’s consideration of the types of trees that would best survive in a particular location and the mechanisms for monitoring and maintenance collectively work to foster success and achieve the overall goal of no net loss of canopy.</p>
O-5-9	<p>Based on the feedback above, and to ensure a sustainable future for our city and its biodiversity, we note that the REIR continues to be willfully incomplete and does not address the critical issues laid out by the courts:</p> <ol style="list-style-type: none"> <li data-bbox="346 1024 1073 1239">1. The City should not be granted the ability to manage our urban forest without ongoing and direct participation from the communities being impacted. These communities are deeply impacted by even a few removals and Urban Forestry has repeatedly targeted trees that have no issues. Urban Forestry has repeatedly failed to manage the very trees they were tasked to protect.</li> </ol>	<p>The assumption made in the DREIR regarding the survival of replanted trees is addressed in Master Response No. 2.</p>
O-5-10	<ol style="list-style-type: none"> <li data-bbox="346 1247 1073 1367">2. We request that the City produce a working environmental document that contains actual science related to removals and best practices within the existing context of responding to Climate Change.</li> </ol>	<p>Please see Master Response No. 1. The recirculated document does not address issues regarding climate change, biodiversity, or community involvement or alternatives such as tree maintenance or no tree removals because they were addressed in the 2021 EIR.</p>

Number	Comment	Response
O-5-11	3. We request that no further tree removals be allowed until such time that the City properly produces a publicly available study of all trees removed along with all trees currently in the ground that can be properly analyzed by nonpartisan scientists working outside of the City family to properly assess next steps.	The commenter’s request to pause all tree removals citywide is beyond the scope of the DREIR. Please see Master Response No. 1. One of the Project objectives is to retain existing street trees that are the cause of sidewalk barriers to the extent feasible, provided the sidewalk improvements would not result in street tree mortality or compromise public safety. Section 3.3.3.1 of the 2021 EIR provides additional detail on the approach that UFD and the City will take when deciding between retention and removal.
O-5-12	4. The ordinance must be revised to include preserving all existing mature trees and enhancing habitat quality per the 30/30 directive.	Please see response O-5-7 and Master Responses 2 and 3, which are related to the selection of replacement trees and habitat for species.
O-5-13	5. Living stakeholders must be prioritized over fear of ADA lawsuits and faux “brush clearance” concerns. To be clear, the ADA lawsuit did not ask or demand that trees be removed, to the contrary, they simply asked to use the public right of way without obstacles. The goal was to repair the sidewalks AROUND trees.	The court decision (Appendix B of the DREIR) specifically affirmed that the <i>Willits</i> Settlement, although related to the Project, is not the same thing; the primary goal of the <i>Willits</i> Settlement is to improve walkway surfaces, which can be done by repairing damage to walkway surfaces, with the preservation of trees to the extent feasible. Therefore, the <i>Willits</i> Settlement did not have a goal to repair sidewalks “around” trees.
O-5-14	6. Any such revised ordinance must have a clear maintenance plan for all newly planted trees for at least five years.	Appendix A presents the street tree maintenance and monitoring requirements for Project implementation. For the first 3 years of planting, UFD would maintain and monitor growth through visual inspections when street trees are manually watered (33 times a year). Replacement street trees that do not survive in their first 3 years would be replaced at a 1:1 ratio. Thus, trees planted during each year would be maintained for the next 3 years under the Project to help ensure long-term viability of the tree. The 3-year maintenance period is based on UFD’s historic experience with street trees (see the 2015 Street Tree Policy, which sets forth the City’s historical experience with a 3-year maintenance period, as adopted as part of the policy). Under the Project, the typical maintenance period is further augmented by the 1:1 replacement component during the first 3 years, at which time the 3-year maintenance period would begin anew.
<b>O-6: United Neighborhoods for Los Angeles (UN4LA)</b>		
O-6-1	Commenter emphasizes support of LA sidewalk repairs and raises concerns about potential impacts to the urban forest. Commenter hopes to work constructively with the City of LA to have concerns addressed and for the Sidewalk Repair Program implemented successfully.	No response to the first paragraph is required. This comment is introductory and outlines the commenter’s belief that the DREIR did not sufficiently address the long-term and short-term impacts on special-status bird species and common bird species, along with cumulative impacts on biological impacts. Responses to specific issues raised by the commenter are addressed below. No further response to this comment is required.



Number	Comment	Response
	<p>We see improvement in the recirculated portions of the EIR, and we appreciate the City’s efforts to address our concerns. However, there are still problems that need to be corrected. Of the areas where the court found that the EIR’s analysis deficient, the following are still not sufficiently addressed in the REIR.</p> <ul style="list-style-type: none"> <li>▪ Long term and short-term impacts to special status bird species and common bird species</li> <li>▪ Cumulative impacts to biological resources</li> </ul>	
O-6-2	<p><b>Impacts to Bird Species, Both Common and Special Status</b> An ongoing problem with the City’s evaluation of impacts to the urban forest is the emphasis on the number of trees as opposed to canopy cover. In this area, the REIR continues to make the same mistake found in the first EIR, because its assessment of impacts is based on the number of trees removed and replanted, instead of calculating canopy gain/loss based on the species removed and the species replanted.</p> <p>The REIR assumes that all tree species offer the same ecosystem services, which is not the case. If the City continues the Sidewalk Repair Program’s current practice of replacing mature trees that provide generous canopy with smaller decorative trees, it’s probable that there will be net loss of canopy over the 30-year life of the program. This will lead to a loss of habitat for both common and special status bird species.</p>	<p>As discussed in Section 1.3 of the DREIR, the court found that the 2021 EIR was deficient in the evaluation of short-term impacts on the tree canopy; this comment is referring to the long-term impacts.</p> <p>Please see Master Responses 2 and 3 regarding the tree canopy, the selection of replacement trees, and habitat for species. Notwithstanding, the DREIR does not assume all trees offer the same ecosystem; it discusses the benefits of larger trees with more canopy (see DREIR pages 2-3 and 2-4).</p> <p>Modeling was based on data from actual removals and replacements, which found that, at maturity, replacement trees would reach 62.6 percent of the removed tree canopy. As determined by modeling, replacing trees at 2:1 and 3:1 ratios, as described in the DREIR, would in fact result in the baseline canopy being reached in Year 30.</p>
O-6-3	<p>The REIR argues once again that the proposed replacement ratios (2:1 for the first 10 years, 3:1 for the second 10 years, and 2:1 for the last 10 years) will actually lead to an increase in tree canopy. However, this claim assumes that replacement trees will produce the same canopy cover as trees that have been removed, which is often not the case. Therefore, appropriate species must be specified in the EIR.</p>	<p>As discussed in Section 1.3 of the DREIR, the court found the 2021 EIR was deficient in the evaluation of short-term impacts on the tree canopy; this comment is referring to replacement trees and long-term impacts. Please see Master Responses 1 and 2 regarding tree canopy and the selection of replacement trees.</p> <p>The modeling takes into consideration that replacement trees are smaller and account for only 62.6 percent of the removed tree canopy.</p> <p>Actual tree removal data were used to develop the averages, considering actual tree species removed and replaced. Further, the modeling included data regarding average tree canopies for species in the tree inventory and for species to be used as replacements.</p>

Number	Comment	Response
O-6-4	<p>The value of an ecosystem as habitat for birds is related to the canopy that the trees offer, not the number of individual trees. Many of the mature trees removed under the Sidewalk Repair Program provided extensive canopy, while the replacement trees used most commonly by the City are smaller trees that will provide less canopy even when they reach full maturity. For example, mature Indian Laurel Fig and mature Camphor trees provide extensive canopy/habitat. The City’s practice of using Crape Myrtles and Mexican Fan Palms as replacement trees will not provide comparable canopy/habitat, even with a replacement ratio of 2:1 or 3:1.</p>	<p>See Master Response No. 2 regarding impacts on the tree canopy and the selection of replacement trees. Also, please see Master Response No. 3 regarding impacts on habitat for species.</p> <p>The DREIR acknowledges that the Project will use replacement trees that, on average, will account for 62.6 percent of the canopy of removed trees. However, when replaced at 2:1 and 3:1 ratios, modeling predicts that the replacement trees will, in fact, reach the baseline canopy in Year 30.</p>
O-6-5	<p>Please see Attachment 1, which documents the removal and replacement of trees at 750 S. Spaulding. The photos illustrate the loss of canopy cover and habitat at this site resulting from the City’s practice of replacing large, mature trees with smaller species. Please also see Attachment 2, the 2018 report from BSS which outlines the number of trees to be removed and the number of replacement trees to be planted. The project involved the removal of 12 Indian Laurel Fig Trees and the BSS report states that they will be replaced at a 2:1 ratio with 12 Natchez Crape Myrtle trees and 12 Chinese Fringe trees.</p> <p>It should be noted that replacement trees were originally planted in 2018. The photos from July 2024 show that some trees are attached to pouches, probably indicating that these trees have been recently replanted. It should also be noted that additional trees, roughly the same size as the other replacement trees, were planted on Alendele, a nearby residential street, in order to achieve the 2:1 replacement ratio. These trees are not pictured in the attachment.</p> <p>Looking at the before and after photos in Attachment 1, it should be clear that, in spite of planting replacement trees at a 2:1 ratio, the replacement trees will never offer comparable canopy, even when they’re fully mature. In general, less canopy means less habitat, with reduced opportunities for nesting and foraging. Raptors, especially, will be impacted by the practice of replacing large mature trees with smaller decorative ones. Raptors prefer higher trees for nesting. For example, red-tailed hawks, a species common in the LA area, often build nests in trees more than 50 feet high. The replacement of tall mature trees with smaller ones will lead to a reduction in habitat for this species and others.</p>	<p>See Master Response No. 2 regarding tree canopy and Master Response No. 3 regarding impacts on species habitat.</p> <p>Attachment 1 to the comment includes photographs of trees on either side of what the comment refers to as “750 S. Spaulding,” though the site appears to in fact be 750 Spaulding Avenue. The commenter presents this as an example of a tree removal and replacement with small trees and states that, even at a 2:1 ratio, the canopy of the replacement trees would never be comparable to that of the removed trees.</p> <p>The DREIR included data from modeling that evaluated how the Project would affect canopy cover. The study looked at actual tree removals and replacements and used data on mature tree sizes (from the Urban Forest Ecosystems Institute SelecTree database) to get an average canopy size for individual tree species. Using that data, it was determined that replacement trees averaged a mature canopy diameter of 30.48 feet, or approximately 62.6 percent of the average tree removal canopy. As found in the modeling, replacing trees at 62.6 percent of the average removed tree canopy at 2:1 and 3:1 ratios, as described in the DREIR, would, in fact, result in reaching the baseline canopy in Year 30.</p> <p>Regarding the loss of habitat, the DREIR analyzed the potential loss of habitat and found that, prior to consideration of any replacement trees, the tree removals would result in removal of up to 1.9 percent of all street trees and 0.2 percent of citywide trees. As described in the DREIR, birds, including raptors, use many trees (and other vegetation and resources) as part of their habitat. The removal of 0.2 percent of citywide trees would not result in a loss of habitat.</p>

Number	Comment	Response
O-6-6	<p>Assessment of Cumulative Impacts on Biological Resources Not Based on Actual Data</p> <p>The REIR does not present actual data to support its assessment of cumulative impacts on biological resources. This is an unacceptable omission. For the most part, the documents cited offer only general assessments. It also relies on assumptions about future tree planting and future tree cover based entirely on promises and proposals, not on adopted plans that have been funded. The REIR also fails to include existing recent studies backed by actual data that would have provided needed context. These studies are known to the City and are readily available. Their omission is baffling.</p>	<p>Please see Master Response No. 4 regarding the evaluation of cumulative impacts and response to comment I-29-2, below.</p> <p>Vacant tree wells and replacement tree requirements were not required to be, nor were they, recirculated. Please see Master Response No. 1 for comments outside the scope of the DREIR.</p> <p>The commenter has provided information regarding vacant tree wells and an example of a street tree that did not grow to full maturity. To the extent that these address the cumulative context of the Project, please see Master Response No. 4. Master Response No. 4 also discusses a 2017 study that shows a decline in tree canopy cover resulting from residential development in the City, and how the study is consistent with the DREIR’s cumulative impact analysis. In addition, Master Response 7 and response P-169-3 from the 2021 Final EIR addressed the comments herein.</p> <p>In summary, street tree watering takes place 33 times per year for 3 years; trees that do not survive the first 3 years are replaced at a 1:1 ratio.</p> <p>As discussed on page 2-4 of the DREIR, street trees are expected to reach maturity, on average, 15 years after planting. The maturation rate used in the canopy model is discussed in the 2021 EIR, Section 3.3.3.1, and Appendix B of the 2021 EIR (see pp. 4–5).</p> <p>A static mortality rate for replacement trees of 8 percent in years 4–15 was applied to the tree canopy model. The 8 percent static mortality rate was based on UFD’s experience with past sidewalk repairs, which demonstrated a mortality rate of between 2 and 8 percent for replacement trees for the first 3 years when they were monitored. Moreover, based on actual monitoring of current sidewalk repairs, replacement trees have demonstrated a static mortality of around 2 to 5 percent (with almost all mortality due to vandalism, not natural street tree death); trees were replaced if they were within the 3-year maintenance replacement period (City of Los Angeles 2020). It can be expected, based on UFD’s experience, that the mortality of the replacement street trees would greatly decline after a growth and establishment period of 3 years.</p> <p>Under the Project, street trees planted would be replaced if they fail to survive the initial 3-year maintenance period. Thus, in effect, the mortality rate of such replacement street trees is 0 percent for the first 3 years. After street trees achieve full maturity at the end of 15 years, they are considered</p>

Number	Comment	Response
		<p>part of the baseline tree canopy within the city and are not considered uniquely vulnerable to mortality.</p> <p>The commenter expresses a concern that current staffing at UFD would preclude these guidelines from being effectively implemented. It is beyond the scope of the DREIR to evaluate staffing; the DREIR evaluates the physical effects on the environment of the recirculated portions of the 2021 EIR. Please see Master Response No. 1.</p>
O-6-7	<p>The City of LA is working to increase the collection of data regarding the urban forest, and some important steps have been made. However, these efforts only began in recent years, and the City has a long way to go before we have the kind of comprehensive data needed to get a detailed understanding of LA’s urban forest. The problem seems to be compounded by the fact that tree planting, tree removals and tree care are handled by different City departments, with insufficient coordination between them. There does not appear to be a single repository for data on trees in the City of LA, including street trees, park trees and trees on private property. It’s hoped that the Urban Forest Management Plan will be the first step in gathering better data and creating a coordinated plan for the City of LA’s urban forest, but the UFMP is still in the works.</p>	<p>This comment is in support of the Urban Forest Management Plan and supports the City’s efforts on data collection. It is noted that the City has developed TreeKeeper, an online tool that provides street tree inventory data. TreeKeeper integrates workflow and inventory management functions, which allows the Bureau of Street Services to consolidate key functions and improve reporting and analysis capabilities. With the new system, maintenance operations and staff observations are automatically captured and reflected in the inventory. Nonetheless, the comment is related to matters outside the scope of the Project or the issues evaluated in the DREIR. Please see Master Response No. 1 for comments outside the scope of the DREIR.</p>
O-6-8	<p>Chapter 3 of the REIR cites the following documents in its discussion of cumulative impacts:</p> <ul style="list-style-type: none"> <li>● City of Los Angeles General Plan</li> <li>● City of Los Angeles Bureau of Street Services 2015 State of the Street Trees Report</li> <li>● City of Los Angeles Bureau of Street Services 5-Year Strategic Plan</li> <li>● Green New Deal pLAn 2019</li> <li>● Los Angeles County General Plan</li> <li>● Los Angeles County General Plan Update EIR</li> <li>● SCAG Regional Comprehensive Plan</li> <li>● SCAG 2016–2040 Regional Transportation Plan and Sustainable Communities Strategy</li> <li>● SCAG 2016–2040 Regional Transportation Plan and Sustainable Communities Strategy EIR</li> </ul>	<p>Please see Master Response No. 4 regarding the analysis of cumulative impacts. The DREIR states that the Green New Deal is aspirational in nature; it does not assume that the goals listed therein will be achieved. Rather, it states that it can be reasonably inferred that City’s efforts to implement the goals will result in beneficial effects but that those effects cannot be relied on due to the aspirational nature.</p>

Number	Comment	Response
	<ul style="list-style-type: none"> <li>● SCAG Connect SoCal 2020 (2020–2045 RTP/SCS)</li> <li>● Connect SoCal 2020 (2020–2045 RTP/SCS) EIR</li> <li>● Metro Long-Range Transportation Plan 2020</li> <li>● 2022 Air Quality Management Plan</li> <li>● 2022 Air Quality Management Plan EIR</li> </ul> <p>The only one of these documents that provides meaningful data on LA’s urban forest is the BSS 2015 State of the Street Trees Report, and its projections based on 2015 conditions is not optimistic. With regard to the urban forest, the Green New Deal is largely an aspirational document and provides no meaningful data to assess the Sidewalk Repair Program’s cumulative impacts. The REIR says the Green New Deal will “Support the planting of 20,000 trees annually on residential and public properties”. But while the City has made various claims about the planting of tens of thousands of trees since the publication of the Green New Deal, we have not been able to obtain evidence supporting these claims, and the REIR provides none. Without substantiation, this has no place in the EIR.</p>	
O-6-9	<p>In fact, the REIR contains different, conflicting claims about the number of trees the City is planting.</p> <p>We start by noting that the REIR refers to the Bureau of Street Services as “Bureau” or “StreetsLA”. In these comments, we simply use the abbreviation “BSS” for convenience.</p> <p>With this in mind, we would like to compare the claims made about tree planting</p> <p>Section 3.3.2, City of Los Angeles Bureau of Street Services 2015 State of the Street Trees Report, begins by explaining that BSS is tasked with maintaining various elements of public infrastructure, including street trees. But the first paragraph on page 3-7 also contains the following:</p> <p style="padding-left: 40px;">However, due to funding limitations since 2008, the Bureau no longer plants street trees and has been limited to providing emergency response for the removal of dead, dying, or hazardous trees; pruning of foliage obstructing traffic control devices and emergency response vehicles; and supervising a small amount of contract tree trimming. [Emphasis added.]</p>	<p>As stated in page 3-7 of the DREIR, the 2015 State of the Street Trees Report provided background information for the Bureau of Street Services’ management and assessment of street trees; it is no longer applicable to the current state of street trees. The bureau’s strategic plan provides a better understanding of goals for the future.</p> <p>The commenter indicates that they have received anecdotal evidence that the Bureau of Street Services does not have the staff to undertake significant tree planting; however, the commenter does not provide any evidence to support this claim. In addition, the commenter’s statement that the REIR contains conflicting claims about the number of trees being planted is addressed in responses to specific comments below.</p> <p>Please also see Master Response No. 1 for comments outside the scope of the DREIR.</p>

Number	Comment	Response
	<p>Granted, this report is almost ten years old, but anecdotal evidence we have received indicates that BSS does not have the staff needed to undertake any significant planting, and that even now BSS relies chiefly on other departments and local non-profits to plant trees.</p>	
O-6-10	<p>Also on page 3-7, in Section 3.3.3, City of Los Angeles Bureau of Street Services 5-Year Strategic Plan, the REIR offers the following: StreetsLA maintains approximately 700,000 sites, consisting of street trees, stumps, and vacant planting locations, and plants approximately 1,000 trees annually throughout the city under the mayor’s Green New Deal (City of Los Angeles 2021).</p> <p>Here the REIR states that BSS plants about 1,000 trees annually throughout the City. Then on page 3-8, Section 3.3.4, Green New Deal pLAn 2019, contains the following statement: Launched in 2019, the Green New Deal sets aggressive goals for the City’s sustainable future by tackling the climate emergency with accelerated targets to be carbon neutral by 2050. The Green New Deal will support eight criteria across the city: climate mitigation, access and equity, quality jobs, workforce development, health and well-being, economic innovation, increased affordability, and resiliency. In regard to street trees, the Green New Deal proposed to plant and maintain 90,000 trees citywide by 2021, which would provide 61.3 million square feet of shade at maturity. The following milestones and initiatives are proposed for the Green New Deal:</p> <ul style="list-style-type: none"> <li>● 2021 <ul style="list-style-type: none"> <li>○ Support the planting of 20,000 trees annually on residential and public properties</li> </ul> </li> </ul> <p>Please note that it says the Green New Deal “proposed” to plant and maintain 90,000 trees. It does not say that approved programs are in place to accomplish this, nor does it say that funding has been secured. The 90,000 tree goal is just a proposal. When we submitted a Public Records Act request to BSS to ask for the number of trees planted so far toward reaching the Green New Deal goal, the response explained that BSS does not have that information, and suggested that we try contacting other City departments, including Bureau of Engineering, the Mayor’s Office or City Plants, this last being a non-profit that has contracted</p>	<p>To date, the Green New Deal has planted 70,000 trees; however, broadly due to contractual issues, it did not meet the goal of planting 90,000 trees by the end of 2021. Although it is outside the scope of this DREIR to address public records requests, it is noted that the information is publicly available online. Please see Master Response No. 4 regarding cumulative impacts.</p>

Number	Comment	Response
	with the City to provide tree-related services. Our concern is that BSS apparently doesn't have access to this information, and isn't sure who does.	
O-6-11	<p>In any case, the statements above appear to conflict with the assertion made in the last paragraph on page 3-14, under Section 3.4, Cumulative Impacts on Aesthetics:</p> <p>Furthermore, one of the StreetsLA programs, as coordinated with many council districts, is planting approximately 1,000 street trees annually and at least 1,000 by 2028 under the Green New Deal pLAN.</p> <p>The conflict in this one sentence is puzzling. It asserts that BSS "is planting approximately 1,000 street trees annually" and then says they will plant "at least 1,000 by 2028 under the Green New Deal pLAN". Even if we assume that the conflicting assertions are simply an error, the REIR does not give specific numbers of trees that have been planted each year, but instead says BSS "is planting approximately 1,000 street trees annually". We understand that the City works with various partners for the majority of its tree planting programs, but why is there no actual data? Without supporting data, this claim has no legitimacy in an EIR.</p> <p>The Green New Deal only offers aspirational goals. There do not appear to be any specific benchmarks to measure progress. There's no indication that the program is being monitored. And importantly for the discussion of cumulative impacts, the REIR does not offer any actual data on trees planted.</p>	<p>Please see Master Response No. 4 regarding comments outside the scope of the DREIR.</p> <p>The language in the DREIR is correct; the two statements are not contradictory. As noted in the DREIR, StreetsLA Goals 3 and 4 call for planting at least 1,000 street trees by 2028 <i>in priority locations</i>. This is not inconsistent with the statement that StreetsLA plants approximately 1,000 trees annually because not all trees are planted in priority locations. As also stated on page 3-14, <i>priority locations</i> refers to areas of greatest need with respect to increasing the tree canopy by at least 50 percent.</p> <p>To the extent that the comment expresses a desire for the City to improve recordkeeping regarding tree planting under the Green New Deal and other programs, the comment is noted. The DREIR relies on available data. The comment is not related to any environmental issue within the scope of the DREIR. Please see Master Response No. 4 regarding the cumulative analysis.</p>
O-6-12	<p>On page 3-14 of the REIR, the authors claim that all impacts related to the Sidewalk Repair Program were previously analyzed in the EIR for the Mobility Plan. Furthermore, the City's Mobility Plan 2035 specifically includes a program titled "Sidewalk Repair: Implement a sidewalk improvement program to bring up all existing degraded sidewalk sections to City standards and implement a program to ensure that future degraded sidewalk sections are promptly identified and repaired in a timely manner" (City of Los Angeles 2016). This program describes and encompasses the entirety of the Willits Settlement and the proposed Project, as specifically acknowledged by the Mobility Plan 2035 Final EIR, and provides "programmatic"</p>	<p>To the extent that the comment expresses a desire for the City to improve recordkeeping regarding tree planting under the Green New Deal and other programs, the comment is noted. The DREIR relies on available data. The comment does not relate to any environmental issue within the scope of the DREIR. Please see Master Response No. 1 for comments outside the scope of the DREIR.</p> <p>Mobility Plan 2035 contains the goal "Access for All Angelenos." An important component is accommodating the needs of disabled people when modifying or installing infrastructure. This aligns with the intent of the <i>Willits</i> Settlement and the SRP. Further, as stated in the Final EIR for Mobility Plan 2035, the proposed Project places a major emphasis on walking in Los Angeles; Mobility Plan 2035 supports walking through specific policies, including streamlined installation standards for</p>

Number	Comment	Response
	<p>analysis of all sidewalk repairs in the city within the plan projections, which would far exceed the scope of repairs in the Willits Settlement and the Project (Mobility Plan 2035 Final EIR, p. 184) (City of Los Angeles 2015a). Thus, the City already analyzed the cumulative impact of Willits Settlement sidewalk repairs as part of its Mobility Plan 2035, and CEQA Guidelines Section 15130(e) provides that if a “cumulative impact was adequately addressed in a prior EIR for a . . . general plan . . . and the project is consistent with that plan . . . an EIR for such a project should not further analyze that cumulative impact.” Therefore, the proposed Project’s cumulative impact analysis is adequate under CEQA Guidelines Section 15130(e) for this particular plan.</p> <p>This surprising claim does not hold up under scrutiny. While it is true that the final version of the Mobility Plan does refer to a Sidewalk Repair program, this is just one of dozens of programs that are listed in the section entitled Action Plan. The single sentence quoted in the REIR constitutes the entire description of the so-called “Sidewalk Repair” program. It contains no details, such as an estimate of how many repairs might be needed, how the program will be implemented, or a likely time frame. There is no mention of the Willits settlement and its specific requirements. Also, both the DEIR and the REIR for the Mobility Plan were published before the City approved the Willits settlement.</p>	<p>pedestrian facilities. A second goal of Mobility Plan 2035 is to provide world-class infrastructure, with supporting policies for pedestrian infrastructure. These policies, programmatic in nature, are wide ranging and more expansive than what is contained in the SRP. For instance, a policy of Mobility Plan 2035 is to include pedestrian curb ramps at 100 percent of intersections and bring all sidewalks up to good condition by 2035. Therefore, although the commenter indicates that there is a single reference to a sidewalk repair program, the goals, objectives, and policies of Mobility Element 2035 are inclusive of the intent of the SRP.</p> <p>As discussed on page 3-6 of the DREIR, the City’s Mobility Plan 2035 specifically includes a program titled “Sidewalk Repair,” a sidewalk improvement program to bring all existing degraded sidewalk sections up to City standards and ensure that future degraded sidewalk sections are promptly identified and repaired in a timely manner (City of Los Angeles 2016). This program describes and encompasses the entirety of the <i>Willits</i> Settlement as well as the proposed Project, as specifically acknowledged by the Mobility Plan 2035 Final EIR, and provides “programmatic” analysis of all sidewalk repairs in the city within plan projections, which would far exceed the scope of repairs in the <i>Willits</i> Settlement and the Project (Mobility Plan 2035 Final EIR, p. 184) (City of Los Angeles 2015a). Thus, the City already analyzed the cumulative impact of <i>Willits</i> Settlement sidewalk repairs as part of its Mobility Plan 2035. CEQA Guidelines Section 15130(e) provides that if a “cumulative impact was adequately addressed in a prior EIR for a . . . general plan . . . and the project is consistent with that plan . . . an EIR for such a project should not further analyze that cumulative impact.” Therefore, the proposed Project’s cumulative impact analysis is adequate under CEQA Guidelines Section 15130(e) for this plan.</p> <p>Please also refer to Master Response No. 4 regarding cumulative impacts and projects.</p>
O-6-13	<p>Furthermore, on page 4.6-7 the Mobility Plan REIR, Chapter 4.6, Biological Resources, we find the following statement:</p> <p><b>IMPACTS</b></p> <p>There are no specifically planned construction projects that are part of the MP 2035; enhancements to the transportation networks are identified at a conceptual level of detail. Funding is likely to change over time due to economic conditions and to fluctuations in the priorities of federal, State and regional funding agencies as well as the City budget. [Emphasis added.]</p>	<p>Please see Master Response No. 4 and the response to comment O-6-12.</p>



Number	Comment	Response
	<p>The Mobility Plan REIR clearly says that there are “no specifically planned construction projects that are part of the MP 2035”. It is impossible for an EIR to assess projects that are not defined even in broad terms. The Mobility Plan REIR does refer to Mitigation Measures BR1 and BR2, but neither of these apply to the work to be performed as part of the current Sidewalk Repair Program.</p>	
O-6-14	<p>The rest of the documents, the LA County General Plan, the SCAG RTP/SCS and the 2022 Air Quality Management Plan only discuss trees and the urban forest in general terms. They offer no specific data with which to assess cumulative impacts. The Metro Long-Range Transportation Plan speaks in vague generalities about policies related to trees throughout LA County. This is not helpful in assessing impacts to the City of LA. The SCAG RTP/SCS and the SCAQMD Air Quality Management Plan are regional plans with no meaningful information on the state of the City of LA’s urban forest. The REIR’s optimistic assessment of cumulative impacts does not provide a credible analysis based on actual data.</p>	<p>Please see Master Response No. 4 regarding cumulative projects and impacts.</p>
O-6-15	<p>While the City references a number of documents that contain no actual data, and some which contain no meaningful information on the urban forest in the City of LA, it fails to include a number of documents that would provide meaningful data and context. One of these, First Step: Developing an Urban Forest Management Plan for the City of LA, was commissioned by the City as a first step in preparing an urban forest management plan.</p> <p>First Step: Developing an Urban Forest Management Plan for the City of LA, 2018  <a href="https://www.cityplants.org/wp-content/uploads/2018/12/10939_LA-City-Plants_FirstStep_Report_FINAL_rev12-7-18.pdf">https://www.cityplants.org/wp-content/uploads/2018/12/10939_LA-City-Plants_FirstStep_Report_FINAL_rev12-7-18.pdf</a></p> <p>This document spells out some of the problems with the City’s current approach, and identifies some of the shortcomings that are reflected in the REIR. On page 15 the report cites the following as issues that need to be addressed:</p> <ul style="list-style-type: none"> <li>Historical and ongoing scattered approach with little follow through.</li> <li>The City’s leadership has attempted to enact resolutions toward urban forestry improvement, but this often occurs with no focused, targeted approach toward more holistically developed goals, and there has been a significant lack of implementation.</li> </ul>	<p>The commenter is citing conclusions that are from initial development of the Urban Forest Management Plan in 2018. The commenter asserts that the 2018 conclusions are reflected in and underscore the shortcomings of the DREIR. It is outside the scope of the DREIR to address the alleged historical shortcomings of the City’s leadership in relation to urban forestry or the City’s technological capabilities for management of the tree inventory. Preparation of the DREIR included a review and consideration of the data contained within First Step: Developing an Urban Forest Management Plan for the City of Los Angeles, as discussed in Section 2.2 (pages 2-1 through 2-6) as well as Section 2.4 (page 2-11). Further, as noted, these citations are from 2018. More recent audits have indicated that there have been improvements. Furthermore, the City has employed TreeKeeper, an inventory that is accessible online. Overall, this comment does not raise a CEQA-related issue but, rather, serves to express the commenter’s general opinion of the DREIR. No further response is required.</p>

Number	Comment	Response
	<p>The City does not know enough about its trees.</p> <p>The City does not have reliable street tree information from a tree inventory, and consequently does not know what it has or what is needed, how to set and achieve short- and long-term goals, and what path toward an optimized urban forest is necessary.</p> <p>The City's technological urban forest management tools are incomplete.</p> <p>Only portions of the City currently use a tree management program with industry-standard features to manage the urban forest.</p>	
P-6-16	<p>Following up on our discussion of loss of habitat, we cite the following article published by the National Science Foundation, which warns that one third of bird species in the LA area have declined over the past century.</p> <p>Climate change, urbanization drive declines in LA's birds: Bird surveys reveal how land use change has amplified the impacts of climate change on birds in Los Angeles and the Central Valley, from US National Science Foundation, March 29, 2023 <a href="https://new.nsf.gov/news/climate-change-urbanization-drive-declines-las#:~:text=The%20study%20found%20that%20urbanization,more%20mixed%20impacts%20on%20biodiversity">https://new.nsf.gov/news/climate-change-urbanization-drive-declines-las#:~:text=The%20study%20found%20that%20urbanization,more%20mixed%20impacts%20on%20biodiversity</a></p> <p>"The study found that urbanization and much hotter and drier conditions in L.A. have driven declines in more than one-third of bird species in the region over the past century. Meanwhile, agricultural development and a warmer and slightly wetter climate in the Central Valley have had more mixed impacts on biodiversity."</p> <p>Please also see the study below which is the basis for the NSF article. Concordant and opposing effects of climate and land-use change on avian assemblages in California's most transformed landscapes, by Beissinger, Et Al, February 22, 2023 <a href="https://www.science.org/doi/10.1126/sciadv.abn0250">https://www.science.org/doi/10.1126/sciadv.abn0250</a></p> <p>Regarding the loss of habitat due to the practice of replacing large, mature trees with smaller species, we cite the following article.</p>	<p>The commenter cites articles that summarize data collected for Los Angeles County and the Central Valley as well as another article that summarizes data from more than 20 cities in the Los Angeles Basin. Further, the commenter provides a hyperlink to an article that discusses the impacts of increases in home sizes and hardscapes associated with private residential development. It is outside the scope of the SRP or this DREIR to consider data that are outside the geographic scope of the Project or related to private residential development</p> <p>As outlined in CEQA Section 15204, CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. Further, issues regarding replacement trees and the long-term tree canopy were not required, nor were they discussed, as part of the DREIR. Please see Master Response No. 1 for comments outside the scope of the DREIR. For informational purposes, please also see Master Response No. 2 regarding the tree canopy and the selection of replacement trees.</p> <p>As discussed in Master Response No. 4, the studies discussed in the comment that show a decline in tree canopy cover resulting from ongoing development in the city are consistent with the DREIR's cumulative impact analysis, which concludes that cumulative impacts on aesthetics and biological resources would be significant, but the project's contribution to the cumulative impact would not be cumulatively considerable.</p>

Number	Comment	Response
	<p>An Urban Forest for the Birds, by Longcore, March 6, 2023 Urban Forest, Vol. 89 No. 4  <a href="https://www.laaudubon.org/blog/2023/3/6/an-urban-forest-for-the-birds">https://www.laaudubon.org/blog/2023/3/6/an-urban-forest-for-the-birds</a></p> <p>"Our Conservation Committee reviewed the tree removal and replacement notices from the Bureau of Street Services and compiled those related to sidewalk repair from September 2017 to April 2020. We categorized them by species and by tree stature (small, &lt;30 ft, medium, 30–70 ft, large, &gt;70 ft). Of the 301 tree removals and 272 tree replacements, there was a loss of 101 large-stature trees (127 large tree removals, 26 large tree replacements), an increase of 98 small-stature trees (8 small tree removals, 106 small tree replacements), and a loss of 33 medium-stature trees (166 medium tree removals, 133 medium replacement trees). These trends show that the City is installing shorter trees as part of the [Sidewalk Replacement Program] and consequently the volume of habitat, biomass, and environmental benefits of these trees will be lower even at the same canopy cover. It is not possible to make up for the loss of height, form, and leaf density of large trees like American Sweetgum by replacing them with small-stature trees such as Crape Myrtle. Even if the canopy cover were replaced, the total benefits to wildlife would be reduced."</p> <p>And finally, we cite this 2017 study, which shows a steady decline in green cover in the Los Angeles area.</p> <p>Increased home size and hardscape decreases urban forest cover in Los Angeles County’s single-family residential neighborhoods by Lee, Et Al, from Urban Forestry &amp; Urban Greening, May 2017  <a href="https://www.sciencedirect.com/science/article/abs/pii/S1618866716303296">https://www.sciencedirect.com/science/article/abs/pii/S1618866716303296</a></p> <p>This study sought to understand how renovation and redevelopment in single-family neighborhoods in the 20 largest cities in the Los Angeles basin affect land cover. Using building data from the tax assessor and aerial imagery from points before and after the renovations, results showed that redevelopment significantly increased hardscape and significantly decreased green cover. Extrapolating the results beyond the sample suggests 1.2% annual decrease in tree/shrub cover for</p>	

Number	Comment	Response
	single-family neighborhoods across the study area. The authors warn of the environmental impacts of changing preferences for house size and levels of impervious cover.	
O-6-17	<p>While we still find significant issues with the Sidewalk Repair Program EIR, as we stated above, we hope that we can work constructively with the City to resolve these issues so that the program can move forward. We understand that the City is obligated to comply with the terms of the Willits settlement, and we do not want to impede progress. We also realize that BSS and UFD are constrained by budgetary and staff limitations, and we hope the City will consider an increase in funding for these departments. We need safe sidewalks and we need a healthy urban forest. We can have both.</p> <p>Thank you for your time.</p> <p>[Refer to Appendix FEIR-B of this Final EIR, Letter 6, pages 10-18, for the photos referenced in the comment.]</p>	This comment does not raise a CEQA issue. It provides a conclusion and expresses a desire for UN4LA to work constructively with the City.
<b>O-7: Angelenos for Trees</b>		
O-7-1	<p>The following are Angelenos for Trees ("AFT") comments to the REIR submitted by the City in connection with its proposed changes to how it implements the Sidewalk Repair Program. AFT supports all repairs to the City's sidewalks. However, it is AFT's position that as important as safe sidewalks are to a livable city so too is a sustainable urban forest. Trees, particularly mature trees, are invaluable in maintaining a healthy urban forest.</p> <p>AFT's comments are intended to highlight the currently diminished state of the Los Angeles Urban Forest and how the removal of an additional 12,000 trees will further accelerate this decline.</p> <p>Pursuant to CEQA, the EIR must use a chosen approach to develop a summary of the expected environmental effects to be produced by past, current, and probable future projects. In this REIR the City elected to use a summary of projections methodology to consider reasonable, feasible options for mitigating or avoiding the project's contribution to any significant cumulative effects. [CEQA Guidelines Section 15130(b)(5)].</p> <p>The City, in its REIR, incorporated and reviewed the City of Los Angeles General Plan (including the Framework Element and Mobility Plan 2035); Los Angeles County General Plan, including the Los Angeles County</p>	This comment is expressing an opinion. The commenter is providing a summary of the process for a cumulative impact evaluation but does not raise a CEQA-related environmental issue that is subject to recirculation as part of this DREIR. Please see Master Response No. 4 regarding the cumulative impact analysis and approach.

Number	Comment	Response
	<p>General Plan, Mobility Element; Southern California Association for Governments Regional Comprehensive Plan; SCAG Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS); Metro Long Range Transportation Plan (2009); and SCAQMD 2016 Air Quality Management Plan (City's Referenced Documents).</p> <p>In considering the past, current, and probable future projects related to the impacts on the urban forest, Angelenos for Trees consulted Davey Tree's TreeKeeper Inventory Management Software for information regarding the status of the current street tree inventory, the consultant report prepared by Dudek (hired by the City of LA) to review the status of Los Angeles Tree Sustainability Practices, the City Controllers Follow-Up: L.A. Tree Trimming &amp; Maintenance Audit, the City Controllers Report - Repairing LA's Broken Sidewalk Strategy, LA San's Biodiversity Report, and a memo prepared for the City Council and dated July 28, 2023 from Vince Bertoni of City Planning, Rachel Malarich from Office of Forest Management, Osana Younan from the Department of Building and Safety, and Keith Mozee from Street Services.</p>	
O-7-2	<p>A. The REIR references that the City is managing 660,000 street trees, which is a more or less true statement. The City, in preparing the report, relied on the City street tree inventory database ("Inventory Database") that currently keeps track of the City street tree inventory<sup>3</sup>. The software program is a point-in-time program, so fluctuations can be expected.</p> <p>However, this is misleading. The City should be managing about 919,000 street trees, as per the Inventory Database. There are 238,464 empty tree sites (wells) and tree sites (wells) with stumps that are not taken into account in the provided 660,000 managed street trees statistic. Additionally, the average vacancy rate of the tree sites (wells) per council district is 25.22%. In certain instances, the vacancy rate is 35%. This is without considering Palms, and dying, poorly trimmed trees that provide no shade for humans and habitat. The chart below highlights the information taken from the Inventory Database.</p> <p>[Refer to Appendix FEIR-B of this Final EIR, Letter 7, page 3, for the table referenced in the comment.]</p>	<p>It is acknowledged that, in addition to the tree count provided on TreeKeepers, there is also data regarding tree wells that are empty or have stumps. As stated on page 2-4 of the DREIR, the City's updated street tree count, which was completed in December 2023, currently stands at 660,034 street trees. This number was used to update the baseline number of street trees used in the 2021 EIR, which did not account for empty tree wells or stumps. Therefore, this is an accurate comparison. Lastly, the commenter is also providing an opinion on the current state of street tree management but does not raise a CEQA-related environmental issue that pertains to the DREIR. Please see Master Response No. 1 for comments outside the scope of the DREIR. The comment is noted for consideration.</p>

<sup>3</sup> losangelesca.treekeepersoftware.com/index.cfm?deviceWidth=1920

Number	Comment	Response
	<p>In conclusion, and to be clear, the City's street trees are already compromised. The impact of a poorly functioning urban forest is being felt now. One quarter of the street tree sites (wells) are empty.</p>	
<p>O-7-3</p>	<p>It does not matter where one lives in Los Angeles: people can walk for blocks without any canopy coverage and habitat is challenged to find safety among street trees. Sure, there are 660,000 trees being maintained, but many have already been so poorly maintained and re compromised (e.g., too widely spaced from each other), are low canopy trees (e.g., palms and small trees), and/or are non-existent. Tree-lined streets with adequate canopy coverage are discoverable, but that is the exception, not the rule.</p>	<p>The commenter is presenting an opinion on the current status of the tree canopy in the city. It is beyond the scope of the SRP to address issues regarding the current lack of tree canopy; however, it is noted that the SRP aims to have no net loss of canopy. In addition, in the event that a street tree cannot be replaced in the general area where a tree was removed, the SRP aims to plant trees in areas with a historically low canopy. Further, as stated on page 2-4 of the DREIR, by the time trees reach maturity at the end of Year 46, it is projected that the SRP will have added nearly 300 acres to the baseline street tree canopy.</p> <p>Replacement tree requirements were not required to be, nor were they, recirculated. Please see Master Response No. 1 for comments outside the scope of the DREIR.</p> <p>One purpose of the revised street tree policy is to provide a diverse street tree population. As identified in Appendix A of the DREIR, there are considerations for street tree selection. These policy guidelines are intended to foster success.</p> <p>When street tree removal cannot be avoided, it is the intent of the SRP to replace street trees using the Considerations for Street Tree Selection and Planting Location in the Street Tree Policy. The SRP focuses on increasing biodiversity rather than promoting aesthetic uniformity where possible in order “[t]o have a mixed-age tree population, adequate species diversity, and an appropriate mix of street tree types to provide a diverse urban forest ecosystem that is able to adapt to changing environmental pressures, such as disease, pest infestation, climate, etc.” It is also the intent of the SRP to identify street trees that have varied forms, textures, structures, flowering characteristics, and other aesthetic benefits to enhance the types of street environments found in the city. UFD will select street tree species from one of approximately 150 options listed in its <i>Street Tree Selection Guide</i> (Appendix B4 of the 2021 FEIR), which is currently undergoing an update, and make efforts to plant native trees where appropriate. However, as discussed in the DREIR, if the existing street tree well location or size is not suitable for a native tree, a UFD-acceptable street tree species will be planted. The Chief Forester of the UFD shall be consulted during all tree replacements and pruning. Selections of replacements will be made on a</p>

Number	Comment	Response
		<p>case-by-case basis, taking into account specific factors at any given location. Some of these factors include the locational need for drought-tolerant species, the need for native or other species that support local wildlife, the viability of the species to be planted at a specific location, and the amount of space available. One purpose of the revised street tree policy is to provide a diverse street tree population. As identified in Appendix A of the DREIR, there are considerations for street tree selection. These policy guidelines are intended to foster success.</p> <p>The 2021 EIR contains several alternatives, some of which considered the use of bulb-outs. Please refer to Chapter 5 of the 2021 EIR. When appropriate, the City will work with LADOT. As noted in Master Response No. 1, responses are not required for issues not evaluated in this DREIR.</p> <p>To the extent that this comment is related to the discussion of cumulative conditions in the DREIR, please see Master Response No. 4.</p>
O-7-4	<p>As referenced in the REIR, private trees are being removed due to the development of housing, whether it is single family or multi-family residences. These trees are not owned by the City, but the City has failed to adequately protect trees in its development processes. A report prepared by the Office of Forest Management, City Planning, Street Services, and the Department of Building and Safety for the City Council in 2023 discusses the various negative impacts these policies have had on the urban forest.</p> <p>There has been substantial reporting and analysis over the past 20 years on the decline of the urban forest. The graphics below show impacts.</p> <ol style="list-style-type: none"> <li data-bbox="373 1024 1045 1143">1. This image prepared by a study from USC Dornsife is from 2000-2009 and was prepared to coincide with USC Dornsife study documenting the loss of trees due to development and includes both street trees and private property trees.</li> </ol> <p>[Refer to Appendix FEIR-B of this Final EIR, Letter 7, page 4, for the screenshot referenced in the comment.]</p> <p>And this image was taken from canopy coverage from Google AI in 2021.</p> <p>[Refer to Appendix FEIR-B of this Final EIR, Letter 7, page 5, for the screenshot referenced in the comment.]</p>	<p>As discussed in Master Response No. 4, the studies discussed in the comment that show a decline in tree canopy cover resulting from ongoing development in the city are consistent with the DREIR’s cumulative impact analysis, which concludes that cumulative impacts on aesthetics and biological resources would be significant, but the project’s contribution to the cumulative impact would not be cumulatively considerable.</p> <p>It is outside the scope of the DREIR to examine the loss of trees that occurs during the process of private residential development. In addition, replacement tree requirements were not required to be, nor were they, recirculated. Please see Master Response No. 1 for comments outside the scope of the DREIR.</p> <p>One purpose of the revised street tree policy is to provide a diverse street tree population. As identified in Appendix A of the DREIR, there are considerations for street tree selection. These policy guidelines are intended to foster success.</p> <p>When street tree removal cannot be avoided, it is the intent of the SRP to replace street trees using the Considerations for Street Tree Selection and Planting Location in the Street Tree Policy. The SRP focuses on increasing biodiversity rather than promoting aesthetic uniformity where possible in order “[t]o have a mixed-age tree population, adequate species diversity, and an appropriate mix of street tree types to provide a diverse urban forest ecosystem that is able to adapt to changing environmental pressures, such as</p>

Number	Comment	Response
	<p>The urban forest coverage has significantly declined, based on visual observation of these two graphics. Unfortunately, the 2021 data on the current urban forest canopy have not yet been released, which prevents a more rigorous side-by-side comparison and achieving a better understanding of the decline.</p> <p>The last full analysis that occurred was conducted by Tree People, Loyola Marymount University, and University of Vermont. In 2016 it was found that, on average, the City has about a 20% canopy coverage - far below what is recommended for full environmental benefits.</p> <p>The study revealed and confirmed deep inequities in tree canopy coverage that exist, depending on where you live in Los Angeles and the loss of connectivity and urban habitat quality. It has been 8 years since that last study, and the City has undergone substantial development with thousands of private trees removed.</p> <p>The removal of another 12,000 trees will have an outsized impact on the urban forest and will negatively impact the goals and framework set forth in LA San's Biodiversity Framework. There will be a substantial loss and an accelerated decline in connectivity and urban habitat quality.</p>	<p>disease, pest infestation, climate, etc.” It is also the intent of the SRP to identify street trees that have varied forms, textures, structures, flowering characteristics, and other aesthetic benefits to enhance the types of street environments found in the city. UFD will select street tree species from one of approximately 150 options listed in its <i>Street Tree Selection Guide</i> (Appendix B4 of the 2021 FEIR), which is currently undergoing an update, and make efforts to plant native trees where appropriate. However, as discussed in the DREIR, if the existing street tree well location or size is not suitable for a native tree, a UFD-acceptable street tree species will be planted. The Chief Forester of the UFD shall be consulted during all tree replacements and pruning. Selections of replacements will be made on a case-by-case basis, taking into account specific factors at any given location. Some of these factors include the locational need for drought-tolerant species, the need for native or other species that support local wildlife, the viability of the species to be planted at a specific location, and the amount of space available.</p> <p>The 2021 EIR contains several alternatives, some of which considered the use of bulb-outs. Please refer to Chapter 5 of the 2021 EIR. When appropriate, the City will work with LADOT. As noted in Master Response No. 1, responses are not required for issues not evaluated in this DREIR. In addition, as noted on page 2-4 of the DREIR, the worst-case scenario would be the removal of 12,860 trees. However, data have shown that the actual number of removals has been much less (an average of 110 trees removed annually).</p> <p>To the extent that this comment is related to the discussion of cumulative conditions in the DREIR, please see Master Response No. 4.</p>
O-7-5	<p>The following is an analysis of how, over a period of 16 years, the City has failed to maintain the urban forest, the resulting impacts of this failure on the urban forest, and what we can expect in the future. The Urban Forestry Division manages the City's street trees. The consistent underfunding of the Urban Forestry Division since 2008 has negatively impacted the City's ability to maintain the City's street trees inventory, resulting in a significant number of trees having died or dying, resulting in approximately 238,000 empty tree sites (including tree wells with stumps).</p>	<p>The comment addresses financial and budgetary issues regarding the UFD but does not raise any environmental issue with the topics addressed in the DREIR. Please see Master Response No. 1 for comments outside the scope of the DREIR.</p>



Number	Comment	Response
	<p>i. As mentioned in Section 3.3.2 of the REIR, the City acknowledges that since 2008, the Bureau of Street Services (the Bureau operates under the Urban Forestry Division) has been significantly underfunded.</p> <p>ii. In 2019, the City contracted with Dudek consulting to review its urban forest sustainability practices. Among the multiple recommendations by Dudek was the finding that trees are not valued in the City budget and planning. The report found that "an estimated budget increase of \$40-\$50 million is needed to manage the urban forest at a sustainable level. The City's annual per-tree urban forestry budget of approximately \$27 is 140% to 212% less than what comparable cities invest each year."</p> <p>iii. A review of the City's budget since 2019 reveals that funding for the Urban Forest Division has been flat and has not been tripled or even increased in any meaningful way. This trend has been confirmed by data from budgets posted on the City Controller's website and confirmed in writing with the City Controller.</p> <p>[Refer to Appendix FEIR-B of this Final EIR, Letter 7, page 6, for the table referenced in the comment.]</p> <p>** Description of Related and Indirect Costs explanation from the Controller's office. Government accounting for overhead costs varies from city to city. Some cities (like LA) spread the cost of support departments (General Services, Information Technology, and Personnel) across all the departments they provide support services to. That is represented in the table row for " Related Costs or INDIRECT COSTS." Similarly, many cities, including LA, charge back the costs of paying liability claims (such as payments to homeowners or vehicle owners for damage done by city trees as well as personnel lawsuits and settlements) to the department "responsible." Such costs are included in the Related or Indirect Costs of the Budget.</p> <p>In this case, it can be assumed that the indirect and related costs include a liability number that continues to increase due to impacts realized from the City's failure to appropriately fund UFD to maintain the Urban Forest and therefore, further saddles UFO with the costs from the miscellaneous lawsuits filed against the City that are associated with the failure to do so.</p>	

Number	Comment	Response
	<p>A review of the current budget and prior budgets reveals that trees are not valued in the City budget. It is reasonable to assume that the City will continue to underfund the Urban Forest Division and the impacts of removing 12,000 additional trees will have an outsized impact on removing whatever mature trees may remain.</p>	
O-7-6	<p>II. The Urban Forestry Division has been unable to properly maintain its existing street trees since 2008, due to sustained underfunding. Failure to adequately maintain street trees has resulted in trees being compromised, thereby accelerating the natural attrition and life cycle of street trees.</p> <p>i. In 2019, and with a follow-up in April 2023, the City Controller reviewed the City's street trees and a report was issued.</p> <p>Key Findings included:</p> <ul style="list-style-type: none"> <li>• In 2015, the City rated the health of street trees with a "D" letter grade.</li> <li>• Approximately 30% of the trees in the region were at risk of dying due to factors such as drought, disease, and pests.</li> <li>• From FY2019-FY2022, Streets LA removed approximately 20,000 dead, dying, or structurally unsound street trees. According to the City Controller, as of 2023 (just last year), the tree removal backlog has also worsened. The number of dead street trees pending removal was 7,145 as of July 2022, compared to 5,200 pending cases in July 2018.</li> </ul> <p>ii. In a recent call to the Urban Forestry Division, it was revealed that there is a 15-year backlog to schedule a stump removal from a tree well (tree sites in Urban Forestry nomenclature).</p> <p>iii. The Urban Forestry Division does not have sufficient resources to do its job. The City Controller found the department is trimming fewer trees annually than in past years. In FY2022, the trim cycle was approximately 21 years, an increase of five years compared to the 16-year cycle reported for FY2018. Further, the cost of proactively trimming each street tree has nearly doubled since FY2018.</p> <p>Due to deferred maintenance and lack of sufficient planting since 2008, it would be reasonable to conclude that, like in 2015, in the near future, 30% of the current urban street trees will die due to attrition by</p>	<p>Issues regarding maintenance and the prior planting practices of UFD were not included, nor were they recirculated. Please refer to Master Response No. 1 for comments outside the scope of the DREIR.</p>

Number	Comment	Response
	<p>natural causes or previous mismanagement, thereby making the backlog substantially worse. Removing another 12,000 street trees as proposed by the Bureau of Engineering will have an outsize impact on the urban forest.</p>	
O-7-7	<p>III. The Urban Forestry Division no longer plants trees due to lack of funding resources and relies solely on third party partners, such as City Plants. The current planting pace cannot keep up with the existing empty tree wells and projected attrition rates.</p> <ul style="list-style-type: none"> <li>i. The City did not meet the aspirational, non-budgeted planting of 90,000 trees by 2021 under the Green New Deal. As of 10/2023 and according to the Office of Forest Management web page, 83,220 trees have been planted. The City is currently almost 3 years behind schedule. Of the trees planted so far, the City Controller found that in March 2023, only 19,851 new street trees were planted.</li> <li>ii. The City Controller concluded that a year after the target date (of 2021) for planting 90,000 trees, the City's tree planting efforts are still short in March 2023 (and remain short as of the date of this letter), all of which jeopardize the ambitious 2028 goals of increasing a more equitable urban forest for those in need.</li> <li>iii. The failure to meet the ambitious 90,000 tree goal in 2 years was partly due to City Plants, the City's major third-party planting partner, temporarily pausing plantings in 2022. A recent look at the City Plants website appears to indicate the temporary pause has not been lifted. [Refer to Appendix FEIR-B of this Final EIR, Letter 7, page 9, for the table referenced in the comment.]</li> <li>iv. In addition, the Urban Forestry Division does not have sufficient staff or funding and is unable to plant trees in conjunction with other programs including the "guaranteed in lieu fee program" where developers provide funding to plant trees. SEC. 62.177. ESTABLISHMENT OF TREE REPLACEMENT AND PLANTING IN-LIEU FEE. (amlegal.com).</li> <li>v. The REIR analysis states that City Plants is planting 2000 or 2400 street trees a year in 2015 and 2016 and it is inferred that this is sufficient. There is no data to contradict this; however, on</li> </ul>	<p>Please see re Master Response No. 1 for comments beyond the scope of the DREIR and Master Response No. 4 regarding cumulative projects. Please also see response to comment O-7-5.</p>

Number	Comment	Response
	<p>its face, due to the status of tree site vacancies, it can only be concluded that this program was not successful. There are presently 238,464 vacant tree sites (tree wells) that need to be planted. It would take over 119 years to plant this number of replacement trees (not considering the continued attrition of street trees) at the rate set forth above.</p> <p>The lack of consistency of operation amongst third party partners, the lack of control over the third parties, and the lack of funding has made meaningful, significant planting an impossible goal. Removing another 12,000 trees will have an outsized influence on the already plundered urban forest.</p>	
O-7-8	<p>IV. Air quality in Los Angeles has received a failing grade from the American Lung Association for having the worst in the nation for well over the past 10 years.<sup>9</sup> It is expected with increased heat - whether that is caused by the urban heat island effect or increased heat in general - air quality will get worse. Certainly, trees can help in two important respects, namely by providing shade and cleaning the air. The impacts of the existing failure to have 238,464 vacant tree sites (tree wells) going unplanted that would provide ecological benefits can be estimated by taking the current 662K trees analyzed on the City tree inventory website (using the same mix of health and age) and dividing it by the benefits provided for air pollution per year for each tree, which lists a \$110.39 benefit factor for each tree. Using this logic, the City is currently not receiving \$26,324,040.96 per annum of air pollution benefits and removing an additional 12,000 trees will result in an additional loss of \$1,324,680.00/per annum. Collectively, this loss will equal \$27,648,720.96/per annum.</p>	<p>The commenter is providing information regarding air quality in Los Angeles and indicates that a loss of trees equates to a loss in air pollution benefits. It is beyond the scope of this DREIR to perform a cost-benefit analysis in relation to air pollution benefits. However, it is noted that the SRP is anticipated to provide an additional 300 acres of canopy coverage by Year 46, which may result in a beneficial impact on air quality. The comments herein do not pertain to the recirculated portions of the 2021 EIR and therefore require no further response. Please see Master Response No. 1.</p>
O-7-9	<p>V. Consistent with the Dudek Report recommendations, the City did hire a City Forest Officer. She was hired to provide vision and leadership that would unite, coordinate, and support the dedicated and talented individuals and leaders who fill urban forestry management. Unfortunately, there seems to be a disconnect between the recommendations and the current sidewalk repair program and as such, it is foreseeable that the impacts of removing these 12,000 trees will have an outsized impact on the City's urban forest.</p>	<p>The commenter believes that the impacts from tree removals under the Project would have an impact on the city's urban forest. The impacts of the Project, including these removals, are evaluated in the 2021 EIR and the DREIR.</p> <p>Assumptions regarding replanting and tree mortality are addressed in Master Response No. 1 for comments outside the scope of the DREIR.</p> <p>As discussed in Master Response No. 2, the DREIR assumes that 12,860 trees would be removed, despite recent data indicating that removals would</p>

Number	Comment	Response
	<p>i. In the City report dated July 28, 2023, the Urban Forestry Division and the City Forest Officer recommend that the City water newly planted trees for a period of 5 years.<sup>10</sup> The current sidewalk repair program only allows for 3 years, thereby increasing the likelihood of mortality of the replacement trees planted. Due to the likelihood of increased mortality, the 30-year replacement goal data is called into serious question.</p> <p>ii. The same report showed the City Forest Officer and Ana Tabuena Ruddy, the Chief Sustainability Officer for StreetsLA, believe that preservation of mature trees is vitally important and is an important part of growing the urban tree canopy in Los Angeles. Additionally, the report insinuates that tree equity cannot be obtained by simply planting new trees. The City has stated in the REIR that it is removing less trees than previously intended and has worked hard to preserve trees. Yet, the City is still forecasting removing 12,000 trees, rather than adjusting the number to reflect the actual number they have been experiencing and what would lessen the detrimental impacts of the program. Taken together, the City's actions seem counter-intuitive.</p> <p>iii. This report further recommends that finding space to plant shade trees is a priority. The City Controller's report, Repairing LA's Broken Sidewalk Repair Strategy,<sup>11</sup> found that the settlement agreement and the Americans with Disabilities Act does not require the City to repair the entire sidewalk and instead, in certain instances, only repair certain spots or issues. This would save money that could be used to preserve existing trees by providing more space for them to grow and not to rely solely on root pruning. Further, to the extent the City finds it needs to replace the entire sidewalk, it feels like a wasted opportunity not to increase the size of the street tree sites and wells to plant large canopy trees.</p> <p>As set forth above, the City of Los Angeles' urban forest is already substantially damaged due to widespread impacts from over 16 years of neglect. The City, in its REIR, has failed to consider the existing state of the urban forest and relied on various plans that were prepared during this 16-year period with little consideration of the current state of the urban forest. These</p>	<p>be significantly lower. This is to provide a conservative estimate and ensure that the environmental impacts evaluated in the DREIR are not underreported. The commenter is correct in saying that relying on the more recent information regarding annual removals would lessen the environmental impacts in the analysis.</p> <p>The commenter's thoughts about the requirements of the Americans with Disabilities Act and the wisdom of the proposed Project are noted for consideration but do not raise any environmental issues with respect to the topics discussed in the DREIR. Please see Master Response No. 1 for comments outside the scope of the DREIR.</p> <p>With respect to the adequacy of the DREIR's cumulative effects analysis, please see Master Response No. 4. We note that, although this is not true of every plan evaluated, the cumulative impacts analysis acknowledged that some plans support the commenter's assertion of a decline in urban trees.</p>

Number	Comment	Response
	<p>plans failed to consider the potential impacts of the now-realized failure of the City to fund the urban forest over 16 years. Further, the REIR fails to consider these cumulative impacts in its analysis.</p>	
O-7-10	<p>The state of the City of Los Angeles sidewalks and street trees impacts residents, the aesthetic appearance of our streets, and accelerates the decline in habitats. The removal of an additional 12,000 street trees to repair damaged sidewalks will only accelerate the cumulative decline of the urban forest in Los Angeles and will have an outside deleterious impact on the appearance and health of the street trees and urban habitat.</p>	<p>Alternatives, including avoiding tree removals, were not required to be, nor were they, recirculated. Please see Master Response No. 1, which discusses comments outside the scope of the DREIR.</p> <p>As noted in Section 3-4 of the DREIR, in areas where street tree removal would be necessary, the effects on the character and quality of the neighborhood would be more perceptible and prominent. In addition, the proposed Project would result in the temporary loss of shading from street tree removals. However, in most cases, implementation of a street tree replacement policy would offset any long-term aesthetic impact.</p> <p>The urban forest would be enhanced by removing potentially diseased, dead, or damaged street trees. This citywide benefit would not damage or degrade recognized or valued views in adopted City land use plans; rather, the biodiversity of the urban forest would be considered and maintained by ensuring that species of street trees would be diverse and compatible with the streetscape and community.</p> <p>Please see Master Responses 2 and 3 for further discussion regarding tree canopy, replacement trees, and species habitat.</p>
<b>O-8: Coastal San Pedro Neighborhood Council</b>		
O-8-1	<p>The Coastal San Pedro Neighborhood Council approved the following motion on Monday July 15, 2024, by a vote of 9-0: Sidewalk Repair Program Draft Environmental Impact Report Resolved, the Coastal San Pedro Neighborhood Council requests that the following be considered in the recirculated portions of the Final EIR for the Sidewalk Repair Program:</p> <ol style="list-style-type: none"> <li>1. Utilize Southern California native trees, e.g. California Sycamore for replacement</li> <li>2. Implement undulating, meandering, non-linear sidewalks</li> <li>3. Install root barriers</li> <li>4. Implement mandated pruning and maintenance schedules</li> </ol>	<p>Replacement tree requirements were not required to be, nor were they, recirculated. Please see Master Response No. 1 for comments outside the scope of the DREIR.</p> <p>Please see Master Response No. 2 in reference to the selection of replacement trees. Appendix A of the DREIR outlines the considerations for street tree selection. In addition, as indicated in Appendix A, in some locations, it may be possible to meander the sidewalk repair around an existing street tree to allow additional room for root growth; however, if meandering requires an additional sidewalk dedication or easement, this would be beyond the scope of the SRP. Further, Appendix A identifies the specifications for root barriers, pruning, and maintenance schedules.</p>

Number	Comment	Response
<b>O-9: The Nature Conservancy</b>		
O-9-1	TNC appreciates the City of Los Angeles’ recirculation of the Sidewalk Repair Program DEIR. We are pleased to see more detail included about biological resources and inclusion of some of our previous comments (see our previous letter attached to this letter as an exhibit). TNC’s comments on the recirculated DEIR are below.	This is an introductory comment. No response is required.
O-9-2	1. We appreciate the detailed analysis and consideration of sidewalks as part of a “complete” and “green” street approach, for example via the Complete Streets Act. However, while the DEIR describes several other plans and policies such as the Complete Streets Act, it is not clear how what is being proposed in the Sidewalk Repair Program intersects with these other plans. We recommend additional information describing how the Sidewalk Repair Plan will align with and implement the items in the other plans and policies.	For purposes of CEQA, the DREIR (as well as the 2021 EIR) included an analysis of other policies and programs that may contribute to cumulative impacts. Collectively and broadly, these policies and programs all contain guiding language that supports protecting, conserving, and improving environmental resources. However, each one has an individualized focus, depending on the intent, whether it be to protect and maintain street trees or improve mobility. Chapter 3.9, <i>Land Use and Planning</i> , of the 2021 EIR discusses the Project’s consistency with adopted land use goals, objectives, policies, and applicable land use plans. Chapter 3.9 was not recirculated; responses herein are limited to the recirculated portions of the 2021 EIR. Please see Master Response No. 1 for comments outside the scope of the DREIR.
O-9-3	2. We do not see our concerns about root pruning addressed and again strongly recommend our previous comments be included in the final EIR. Concerns from our original letter here: “We are concerned about the street tree maintenance and pruning policies outlined in the project. Root pruning is described as a primary method to maintain trees to avoid heaving and other damage to sidewalks and consequent reduction in access and usability. The root pruning section outlines the appropriate practices and guidelines but then states that the City cannot follow these practices or guidelines due to existing constraints. The DEIR states cutting roots closer than three to five times a tree’s diameter is “highly discouraged” and urban tree care experts from around the nation whom we consulted recommended that root pruning should not be done any closer than six times a tree’s diameter. Thus, if the City is not following even the three to five recommendation, they will fall far short of the recommended six times a tree’s diameter. If these recommendations are not followed, Los Angeles will likely face the decline and loss of large numbers of street trees and the loss of the benefits that these	The commenter is reiterating concerns expressed regarding pruning. This comment was addressed in the April 2021 Final EIR on page 327 (see response to comment P-252-7). Please see Master Response No. 1 for comments outside the scope of the DREIR; no further response is required.

Number	Comment	Response
	trees provide to residents and visitors, and to native birds and other wildlife. The policy, as it is outlined in the DEIR, will increase tree losses rather than promote street tree retention, In addition, for trees that survive, root pruning will likely have to be repeated at intervals of 3-several years. This means that ongoing, costly action will be required of the City that will continue to damage and kill more street trees and further reduce their benefits to people and nature. Root pruning is a temporary and potentially harmful approach that will not stop the problem of trees impacting sidewalks from reoccurring.”	
O-9-4	3. We are concerned about the plan to replace trees with species that match the predominant tree species on the block at the replacement site. While this seems like an easy way to ensure site suitability, we find it problematic for a number of reasons. In general, it is preferable to diversify the tree species in a given area instead of promoting a monoculture. This decreases the risk of disease and invasive species spreading amongst a given species. In fact, the existing predominance of a given species may have led to the disease or mortality that necessitated the removal in the first place. If the removed trees’ species is the same species as the predominant species, this may indicate that this species is in fact not suitable for the site. Finally, we need to ensure trees species are suitable not just for current climates, but future, changing climates as well, meaning that the current predominant species may no longer be suitable. Thus, we instead want to promote a policy that favors replacing removed trees with native, future climate adapted, and diverse species.	Please see Master Response No. 2 regarding the selection of replacement trees. This comment raises issues regarding the wisdom of the proposed Project, including its objectives, and the unchanged portions of the EIR that are not related to environmental issues evaluated in the DREIR. Please see Master Response No. 1 for comments outside the scope of the DREIR. Project objectives and policies call for retaining mature street trees as much as feasible. The removal of mature street trees would occur only where retaining a mature tree might compromise public safety or where the street tree would be likely to die as a result of the root pruning required by sidewalk improvements. As discussed in Section 1.1, page 1-2, of the DREIR, when a mature street tree at any repair site needs to be removed, the City will replace it at a 2:1 ratio during years 1–10, 3:1 during years 11–21, and 2:1 during years 22–30. These replacement ratios are designed to ensure a net-zero street tree canopy loss over the life of the Project. Replacing street trees in this way also allows the City to develop a mixed-age and adequately diverse street tree population that will be able to “adapt to changing environmental pressures” and provide improved aesthetic benefits, such as more “flowering characteristics.”
<b>I-10: Wansun Song</b>		
I-10-1	we need a streamlined uniform and fair approach to repairing sidewalks. the sidewalk in my neighborhood is in such disrepair that it is difficult to safely walk on it given its sharp angle. persons with mobility issues are risking injury trying to walk across it and it's on Olympic Blvd, a well traveled main thoroughfare. this is not acceptable in this glorious city.	This comment raises general points regarding the approach to repairing sidewalks and the need for sidewalk repairs in specific areas. It does not raise any issue regarding the environmental impacts of the proposed Project under CEQA. Please see Master Response No. 4 in reference to cumulative projects and impacts. For reporting existing sidewalks in need of repair, please see Safe Sidewalks LA.



Number	Comment	Response
<b>I-11: Marianne Davis</b>		
I-11-1	LA City must become CONSISTENT with the need to maintain canopy. Other large cities already have figured out how to keep sidewalks accessible WITHOUT cutting down established trees. LACity should go visit and see how it's done	This comment addresses the wisdom of the proposed Project but does not raise any environmental issue with the analysis in the DREIR. It is noted for consideration. Please see Master Response No. 1 for comments outside the scope of the DREIR.
<b>I-12: Lisa Wolf</b>		
I-12-1	But who PAYS for the project?	This comment addresses the wisdom of the proposed Project but does not raise any environmental issue with the analysis in the DREIR. It is noted for consideration. Please see Master Response No. 1 for comments outside the scope of the DREIR.
<b>I-13: Tim Mullen</b>		
I-13-1	I saw that the DEIS for the Sidewalk Repair Program has a comment period that has started. A few years ago for the first comment periods of the Sidewalk Repair Program, the City of LA used SmartComment to bring in the public comments, organize them and analyze them with charts and graphs.  Do you have twenty minutes to get on the phone and see if you want to use SmartComment for this comment period? Our main contact was Shilpa and would love to talk you through how we can take any comments you receive and import them into SmartComment then give your staff all the tools they will need to run a very organized comment period.  Let me know if you are interested and want to get on a quick phone call.	This comment does not raise any environmental issue with the analysis in the DREIR. No further response is required. Please see Master Response No. 1 for comments outside the scope of the DREIR.
I-13-2	I want to follow up on this to see if you can talk about how SmartComment's public comment platform can help your staff organize and respond to these public comments. Let me know if you want to get on the phone or see a quick demo.  Thanks!	This comment does not raise any environmental issue with the analysis in the DREIR. No further response is required. Please see Master Response No. 1 for comments outside the scope of the DREIR.

Number	Comment	Response
<b>I-14: Kim Nguyen</b>		
I-14-1	How do we have someone come by to look at a sidewalk repair that was already done in the past?	This comment does not raise any environmental issue with the analysis in the DREIR. No further response is required. Please see Master Response No. 1 for comments outside the scope of the DREIR.  For information about the Sidewalk Repair Program, including how to report a sidewalk problem and make repair requests, or determine the status of a submitted repair request, please visit <a href="https://sidewalks.lacity.org/">https://sidewalks.lacity.org/</a> .
<b>I-15: Soraya Dosaj</b>		
I-15-1	I approve of keeping existing trees and/or replacing them with additional trees in close proximity to those removed. I would like to see sidewalks widened or cleared so that two people can walk side by side.	This comment addresses the wisdom of the proposed Project but does not raise any environmental issue with the analysis in the DREIR. It is noted for consideration. Please see Master Response No. 1 for comments outside the scope of the DREIR.
I-15-2	Sidewalks need to be repaired in a more timely manner to accommodate people with disabilities or those using walkers or wheelchairs.	This comment does not raise any environmental issue with the analysis in the DREIR. Please see Master Response No. 1 for comments outside the scope of the DREIR.
<b>I-16: Georgia Yamamura</b>		
I-16-1	CD6 has forever made the claim that all that can be done are Asphalt patches for sidewalks unless the homeowner wants to pull a permit to have concrete repair for the sidewalks-at the homeowners expense to repair a public sidewalk here in Lake Balboa. This is disgraceful and a slap in the face to seniors who have fallen and injured themselves on the asphalt patches on the sidewalks in Lake Balboa--specifically 6500-6700 Rubio Ave and Ruffner Ave.	This comment does not raise any environmental issue with the analysis in the DREIR. Please see Master Response No. 1 for comments outside the scope of the DREIR.  For information about the Sidewalk Repair Program, including how to report a sidewalk problem and make repair requests, or determine the status of a submitted repair request, please visit <a href="https://sidewalks.lacity.org/">https://sidewalks.lacity.org/</a> .
I-16-2	I tried to inform the Field Deputy from CD6--Rosie Avetisyan and her supervisor Andres Sandoval about how unsafe the sidewalks are. They both told me to contact 311.  I also contacted Congressman Tony Cardenas and he responded that it was a CD6 issue.	This comment does not raise any environmental issue with the analysis in the DREIR. Please see Master Response No. 1 for comments outside the scope of the DREIR.  For information about the Sidewalk Repair Program, including how to report a sidewalk problem and make repair requests, or determine the status of a submitted repair request, please visit <a href="https://sidewalks.lacity.org/">https://sidewalks.lacity.org/</a> .
I-16-3	My concern is that seniors have hurt themselves and fallen on the asphalt patches and uneven sidewalks and that wheelchair bound residents are unable to use the sidewalks.	This comment does not raise any environmental issue with the analysis in the DREIR. Please see Master Response No. 1 for comments outside the scope of the DREIR.

Number	Comment	Response
	I cannot believe how uncaring Rosie and her boss Andres Sandoval and Tony Cardenas are about the safety of Seniors and Wheelchair residents.	For information about the Sidewalk Repair Program, including how to report a sidewalk problem and make repair requests, or determine the status of a submitted repair request, please visit <a href="https://sidewalks.lacity.org/">https://sidewalks.lacity.org/</a> .
<b>I-17: Stacia Nemeth</b>		
I-17-1	The Recirculated Draft EIR provides streamlined procedures for sidewalk repair while considering humans and trees. It seems as if it has considered everyone's viewpoints and it includes logical and rational solutions. Please approve the Recirculated Draft EIR and get moving on the Sidewalk Repair Project for the benefit of all residents and vistors.	This comment addresses the wisdom of the proposed Project but does not raise any environmental issue with the analysis in the DREIR. It is noted for consideration. Please see Master Response No. 1 for comments outside the scope of the DREIR.
<b>I-18: Mercedes Ramirez</b>		
I-18-1	This is a great program that will help our community.	This comment addresses the wisdom of the proposed Project but does not raise any environmental issue with the analysis in the DREIR. It is noted for consideration. Please see Master Response No. 1 for comments outside the scope of the DREIR.
<b>I-19: Kyle Metcalfe</b>		
I-19-1	I saw your public comment period for the Draft Environmental Impact Report for the Sidewalk Repair Program (SRP DEIR) online and was curious if you have been receiving any handwritten comments or letters that you have to transcribe? I'd like to share a new resource we just launched that uses AI to transcribe handwritten notes, take a look at <a href="https://transcribe.konveio.com/">https://transcribe.konveio.com/</a> - first 500 comments are on us.	This comment does not raise any environmental issue with the analysis in the DREIR. Please see Master Response No. 1 for comments outside the scope of the DREIR.
I-9-2	I'm wondering if you received my last email about the Draft Environmental Impact Report for the Sidewalk Repair Program (SRP DEIR)? Beyond the free handwritten comment transcription I mentioned before, our Konveio platform helps facilitate draft reviews, from assigning & resolving comments with a team, to AI comment summaries, auto-tagging and finding cross-cutting themes. Let me know if you'd be interested and available for a quick call in the next week or two to learn more?	This comment does not raise any environmental issue with the analysis in the DREIR. Please see Master Response No. 1 for comments outside the scope of the DREIR.

Number	Comment	Response
<b>I-20: Georgia Yamamura</b>		
I-20-1	In Feb. 2024 I went to CD6 first and then to Congressman Tony Cardenas. Mr. Cardenas referred me back to CD6. CD6 told me to go to 311--which I did. 311 said that for concrete repair it is the homeowner responsibility to pay. Imagine that for a public sidewalk. The city did offer Asphalt patches for the sidewalks. The problem with the Asphalt patches is that it makes the sidewalks uneven, and many senior residents and wheelchair residents are unable to use Andres Sandoval from CD6 he just laughed and said he has fallen on the uneven sidewalks--uncaring for Senior's welfare and safety walking on broken sidewalks.	This comment does not raise any environmental issue with the analysis in the DREIR. Please see Master Response No. 1 for comments outside the scope of the DREIR.  For information about the Sidewalk Repair Program, including how to report a sidewalk problem and make repair requests, or determine the status of a submitted repair request, please visit <a href="https://sidewalks.lacity.org/">https://sidewalks.lacity.org/</a> .
I-20-2	I specifically spoke to Andres Sandoval about the bad sidewalks on 6500-6700 Rubio Ave and Ruffner Ave--this was in February 2024. I have attached pictures of Rubio Ave and Ruffner Ave, the letter from Tony Cardenas' office, 311 response to my request for sidewalk repairs. [Refer to Appendix FEIR-B of this Final EIR, Letter 20, page 2-10, for the table referenced in the comment.]	This comment does not raise any environmental issue with the analysis in the DREIR. Please see Master Response No. 1 for comments outside the scope of the DREIR.  For information about the Sidewalk Repair Program, including how to report a sidewalk problem and make repair requests, or determine the status of a submitted repair request, please visit <a href="https://sidewalks.lacity.org/">https://sidewalks.lacity.org/</a> .
<b>I-21: Adelita Ceja</b>		
I-21-1	A few years back I had requested sidewalk repairs in Arleta. Nothing was repaired city works just added asphalt to some areas. Does this mean I can resubmit my request for the neighborhood sidewalk repairs?	This comment does not raise any environmental issue with the analysis in the DREIR. Please see Master Response No. 1 for comments outside the scope of the DREIR.  For information about the Sidewalk Repair Program, including how to report a sidewalk problem and make repair requests, or determine the status of a submitted repair request, please visit <a href="https://sidewalks.lacity.org/">https://sidewalks.lacity.org/</a> .
<b>I-22: Heather Lowry Stewart</b>		
I-22-1	Refer to four previous emails below regarding sidewalk repairs. Note: the comment was reorganized to be chronological by date. <b>September 27, 2019.</b> Initial email from Heathery Lowry Stewart Hello Field Deputy Matthew Vallecilla, The sidewalk located at 22504 Hartland Street, in West Hills, CA 91307 needs to be fixed. We have several people on this block with disabilities, and due to the disrepair of the sidewalk, people in wheelchairs, canes, and seniors have to leave the sidewalk and walk in the street to pass by safely.	The commenter provided a log of previous and/or individual requests for sidewalk repairs but raised no CEQA-related environmental issue. Please see Master Response No. 1 for comments outside the scope of the DREIR.  For information about the Sidewalk Repair Program, including how to report a sidewalk problem and make repair requests, or determine the status of a submitted repair request, please visit <a href="https://sidewalks.lacity.org/">https://sidewalks.lacity.org/</a> .

Number	Comment	Response
	<p>We have had a lady in her wheelchair tip over twice due to the sidewalk being raised up so high that it is impossible to traverse. Street Maintenance has patched the sidewalk for over 30 years and not fixed the problems. The patched sidewalk is dangerous for all of us to pass over, due to it being so high. It is a tripping hazard, a tip-over hazard, and a broken bone hazard.</p> <p>In no way is this sidewalk in compliance with the Americans with Disabilities Act (ADA)! All of the residence that live on Hartland in this block, and around the neighborhood are asking for this sidewalk to be fixed. A tree will need to be removed, and a new deep rooting tree should be placed in the area of the removed tree after the sidewalk is fixed.</p> <p>Hope that you will address this issue.</p> <p><b>September 27, 2019.</b> Response from Matthew Vallecilla Hi Heather,</p> <p>Thanks for bringing this to my attention. The City does prioritize request made by or on behalf of people with mobility disabilities. You can report and request that the sidewalk be repaired by filling out the request form on the MyLA311 website. I have linked the site here for you convenience: MyLA311 Service Request Electronic Form You will have to certify that you are or the person with the mobility disability has given you permission to request on their behalf, otherwise I would fill the form out for you.</p> <p>Please feel free to contact me if you need help filling out the electronic form and I will be happy to assist you.</p> <p><b>September 27, 2019.</b> Response from Heather Lowry Stewart Thank you, Matthew Vallecilla.</p> <p>I filled out a request for the sidewalk to be repaired once again, but it appears that no one even looks at the requests. I never get any replies, and nothing is ever accomplished to fix the sidewalk problem.</p> <p>We have petitioned with signatures of our residence around this area have signed, but our neighborhood does not get any attention. We pay our taxes, but we receive no care. It is very sad. Also, everyone around in this area is still waiting for Sausalito Ave. and Schoolcraft Street to be repaved. It has been over 55 years, many requests, and no answers to when this street will be repaved!</p>	

Number	Comment	Response
	<p>Mitchell Englander knew of this problem, and he, unfortunately, was not able to accomplish the requests that all of our neighbors requested. We are a neighborhood that has been forgotten about!</p> <p>However, we did get two streets that did not need to be repaved, repaved. Really unbelievable!</p> <p>Hoping that Council Member John Lee will have more luck!</p> <p><b>October 4, 2019.</b> Response from Matthew Vallecilla Heather,</p> <p>Regarding the Sidewalk Repair Program in the City -- The good news is that the City is prioritizing repairs to sidewalks where disability or mobility are issues. There are other criteria being used and all repairs are prioritized based on a compete scoring system that was approved by the City Council via City Ordinance. I have included the information so you can read and understand and get an idea of how likely your sidewalk might range.</p> <p>Please let me know if you have any questions.</p> <p>[Refer to Appendix FEIR-B of this Final EIR, Letter 22, pages 1 and 2, for the sidewalks repair program information referenced in the comment.]</p>	
<b>I-23: Elaine Bowling</b>		
I-23-1	<p>Our sidewalks on Rubio Ave are impassable. Photo taken at the corner of Rubio &amp; Haynes.</p> <p>[Refer to Appendix FEIR-B of this Final EIR, Letter 23, page 1, for the photo referenced in the comment.]</p>	<p>This comment does not raise any environmental issue with the analysis in the DREIR. Please see Master Response No. 1 for comments outside the scope of the DREIR.</p> <p>For information about the Sidewalk Repair Program, including how to report a sidewalk problem and make repair requests, or determine the status of a submitted repair request, please visit <a href="https://sidewalks.lacity.org/">https://sidewalks.lacity.org/</a>.</p>
<b>I-24: Jacob Emery</b>		
I-24-1	<p>Can you make sure to remove the giant tree from the front of my house at 16824 Hart Street that has completely destroyed the sidewalk, ruined my front gate, and is now pressing against the sewer?</p>	<p>This comment does not raise any environmental issue with the analysis in the DREIR. Please see Master Response No. 1 for comments outside the scope of the DREIR.</p> <p>For information about the Sidewalk Repair Program, including how to report a sidewalk problem and make repair requests, or determine the status of a submitted repair request, please visit <a href="https://sidewalks.lacity.org/">https://sidewalks.lacity.org/</a>.</p>

Number	Comment	Response
<b>I-25: Olivia Cueva-Fernandez</b>		
I-25-1	<p>Project Objectives</p> <p>I support compliance with the requirements of the Willits settlement.</p> <p>I support retaining existing street trees that are the cause of sidewalk barriers especially in the Wilmington community due to the poor air quality that exists from port related truck, ship, and rail traffic, refineries, City of Los Angeles neglect of tree trimming, and other sources. In many cases, residents have taken upon themselves to cut down street trees to three-foot stumps in order to prevent accidents from dangerous sidewalk conditions.</p>	<p>This comment addresses the wisdom of the proposed Project but does not raise any environmental issue with the analysis in the DREIR. It is noted for consideration. Please see Master Response No. 1 for comments outside the scope of the DREIR.</p>
I-25-2	<p>I am uncertain about the requirements for tree removal(s).</p>	<p>Please see DREIR page 2-5 regarding trees that are eligible for removal under the Project. This comment does not raise any environmental issue with the analysis in the DREIR. Please see Master Response No. 1 for comments outside the scope of the DREIR.</p>
I-25-3	<p>I do not fully support the criteria for determining future sidewalk repairs. It is too complex and does not address a citizen's request for prompt sidewalk repair. The City must address a budget to increase work crews to do the job throughout the city and communities under its jurisdiction.</p>	<p>This comment addresses the wisdom of the proposed Project but does not raise any environmental issue with the analysis in the DREIR. It is noted for consideration. Please see Master Response No. 1 for comments outside of the scope of the DREIR.</p>
I-25-4	<p>Additional Comments</p> <p>Wilmington's Industrial Park has unpaved and uncurbed streets. How will this be addressed?</p>	<p>This comment does not raise any environmental issue with the analysis in the DREIR. Please see Master Response No. 1 for comments outside the scope of the DREIR.</p>
I-25-5	<p>A residential street, Sandison Street from Wilmington Blvd. to Island Avenue, is black-topped and has no curbs. Residents may not want to pay or afford the upgrading; but the community has been a part of LA since 1909, so why aren't all the streets paved? From us, plenty money is generated for the City.</p>	<p>This comment does not raise any environmental issue with the analysis in the DREIR. Please see Master Response No. 1 for comments outside the scope of the DREIR.</p>
I-25-6	<p>Also, funds are available for corner curbs, but how does a disabled person reach that corner if the sidewalk is not adequately safe? They use the street</p>	<p>This comment does not raise any environmental issue with the analysis in the DREIR. Please see Master Response No. 1 for comments outside the scope of the DREIR.</p>
I-25-7	<p>Suggestion</p> <p>For better access to information and comments, public meetings should be available at sites in the community. We strongly need sidewalk/curb repairs and tree trimming!</p> <p>Thank you for the opportunity to comment.</p>	<p>This comment concerns the wisdom of the proposed Project but does not raise any environmental issue with the analysis in the DREIR. It is noted for consideration. Please see Master Response No. 1 for comments outside the scope of the DREIR.</p>

Number	Comment	Response
<b>I-26: Tim Micsko</b>		
I-26-1	Save our trees	This comment does not raise any environmental issue with the analysis in the DREIR. Please see Master Response No. 1 for comments outside the scope of the DREIR.
<b>I-27: Hugh Kenny</b>		
I-27-1	Please listen to recommendations of the Community Forestry Advisory Committee (CFAC). I attend their meetings as an observer and it is clear that they know what they're talking about. Thank you.	This comment addresses the wisdom of the proposed Project but does not raise any environmental issue with the analysis in the DREIR. It is noted for consideration. Please see Master Response No. 1 for comments outside of the scope of the DREIR. The comments submitted by CFAC are addressed in responses P-1-1 through P-1-43.
<b>I-28: Rebecca Westberg</b>		
I-28-1	When repairing sidewalks, please keep future growth of roots in mind. A straight path is not always the best solution since trees will continue to push up sidewalks. Taking out trees creates loss of shade. There has to be better solutions. Can there be, for example, gravel paths instead of cement? Some communities don't have sidewalks. But further, don't plant trees that are huge when full grown or non-natives. Thanks!	Please see Master Response 2 regarding the selection of replacement trees. Appendix A of the DREIR outlines the considerations for street tree selection. In addition, as indicated in Appendix A, in some locations, it may be possible to meander the sidewalk repair around an existing street tree to allow additional room for root growth; however, if meandering requires an additional sidewalk dedication or easement, this would be beyond the scope of the SRP. Further, Appendix A identifies the specifications for root barriers and pruning.
<b>I-29: Marianne King</b>		
I-29-1	The subject EIR estimates and projections does not adequately take into account that Urban Forestry has been operating under systemic system wide failure for at least 20 years and it is only getting worse with respect to the poor maintenance of street trees, the increase in street tree removals for reasons well beyond just sidewalk repair (i.e., above ground transformers, new driveways, etc), and the ongoing increased removal of the city's best and larger canopy trees that are being replaced (if replaced at all) with small trees that don't do much with respect to providing shade, much less habitat for birds, etc. The average diameter of canopy estimated to be 38 feet versus a replacement with average canopy of 30 feet within 15 years is grossly exaggerated and not based on facts, like what's on the ground.	The commenter provides an opinion on operation of UFD, which is beyond the scope of the DREIR. In addition, please see Master Response 1 for comments outside the scope of this DREIR. Please see Master Response No. 1 regarding tree canopy and Master Response 2 regarding tree replacement selection.



Number	Comment	Response
I-29-2	<p>For example, there are currently over 250,000 vacant tree wells in the city. With the current staffing, the tree trimming cycles are roughly every 17 years. There are street trees that cannot even grow to their full maturity because of stunted growth conditions and neglect. (See attached photo example of a crape myrtle tree in bad shape in 2007 looking the same way in 2023). And we are supposed to believe that the all replacement trees will be planted within one year of removal (see vacant tree wells), and that these trees will be watered regularly for 3 years, etc.??? Also, the fact that there is no clear accounting of the mortality rate of a replacement tree after 3 years and that this won't be looked is the writing on the wall.</p>	<p>Vacant tree wells and replacement tree requirements were not required to be, nor were they, recirculated. Please see Master Response No. 1 for comments outside the scope of the DREIR.</p> <p>The commenter has provided information regarding vacant tree wells and an example of a street tree that did not grow to full maturity. To the extent that these address the cumulative context of the Project, please see Master Response No. 4. In addition, Master Response 7 and response P-169-3 of the 2021 Final EIR addressed the comments herein.</p> <p>In summary, street tree watering takes place 33 times per year for 3 years; trees that do not survive in the first 3 years are replaced at a 1:1 ratio.</p> <p>As discussed on page 2-4 of the DREIR, street trees are expected to reach maturity, on average, 15 years after planting. The maturation rate used in the canopy model is discussed in the 2021 EIR, Section 3.3.3.1, and Appendix B of the 2021 EIR (see pp. 4-5).</p> <p>A static mortality rate for replacement trees of 8 percent from years 4-15 was applied to the tree canopy model. The 8 percent static mortality rate was based on UFD's experience with past sidewalk repairs, which demonstrated a mortality rate of between 2 and 8 percent for replacement trees for the first 3 years when monitored. Moreover, based on actual monitoring of current sidewalk repairs, replacement trees have demonstrated a static mortality rate of around 2 to 5 percent (with almost all mortality due to vandalism, not natural street tree death); trees were replaced if they were within the 3-year maintenance replacement period (City of Los Angeles 2020). It can be expected, based on UFD's experience, that the mortality of the replacement street trees would greatly decline after a growth and establishment period of 3 years.</p> <p>Under the Project, street trees planted are replaced if they fail to survive the initial 3-year maintenance period. Thus, in effect, the mortality rate of such replacement street trees is 0 percent for the first 3 years. After street trees achieve full maturity at the end of 15 years, they are considered part of the baseline tree canopy within the city and not considered uniquely vulnerable to mortality.</p> <p>The commenter expresses a concern that current staffing at UFD would preclude effective implementation of the guidelines. It is beyond the scope of the DREIR to evaluate staffing; the DREIR evaluates physical effects on the environment in the recirculated portions of the 2021 EIR. Please see Master Response No. 1 for comments outside the scope of the DREIR.</p>

Number	Comment	Response
I-29-3	<p>In times of excessive heat, drought, water scarcity, the mature trees that exist today, like canary island pines, have withstood and adapted to these environmental challenges. They are being removed and replaced with young trees that will likely not make it because they need more care, watering, etc. What is worse, they are being replaced with trees, like desert willow trees, which is does not come close to shade canopy square footage provided by the tall pines. We will never get that tree canopy back in most of our lifetimes, even if it is 2:1.</p>	<p>Replacement tree requirements were not required to be, nor were they, recirculated. Please see Master Response No. 1 for comments outside the scope of the DREIR.</p> <p>Replacement trees will be selected by UFD. Site conditions are considered prior to choosing the replacement species to ensure the best possible outcome.</p> <p>The commenter asserts that young trees will most likely not survive; however, the commenter provides no evidence that replacement trees will have low survivability. The reality is that Los Angeles has a climate that is highly suitable for trees from around the world, and more than 150 species are available to choose from for replacement trees.</p> <p>Although large trees are still part of the replacement inventory, the DREIR acknowledges that replacement trees will, on average, be smaller than the removed trees. In fact, as described in the DREIR, modeling was based on data from actual removals and replacements, which found that, at maturity, replacement trees would reach 62.6 percent of the removed tree canopy. The same modeling found that, after seeing a reduction in overall canopy initially, the canopy would return to baseline conditions in Year 30.</p> <p>Please see Master Response 2 regarding the selection of replacement trees.</p>
I-29-4	<p>Please provide better tree canopy data, and not just at one point in time (i.e. 2016), and explain how these goals and objectives will actually be achieved. Without funding and adequate staffing, there is no acceptable plan for the replacement of 13,000 trees and counting.</p>	<p>Replacement tree requirements were not required to be, nor were they, recirculated. Please see Master Response No. 1 for comments outside the scope of the DREIR.</p> <p>The DREIR describes the plan for replacing removed trees. First, only trees that meet the SRP Street Tree Policy for removal will be removed. This means that, when possible, trees will be left in place. Further, the policy requires that trees be replaced at a 2:1 ratio in years 1–10, 3:1 in years 11–21, and 2:1 in years 22–30.</p> <p>The data presented from the modeling was the most current data available when the modeling was conducted in 2018. Since that time, although canopy data were not provided, the DREIR did describe actual removal and replacement data from the first 7 years of removals. On average, 110 trees have been removed annually, rather than the 292 to 336 per year that was anticipated. Data suggest that 80 percent of trees adjacent to projects have been left in place.</p>

Number	Comment	Response
I-29-5	Lastly, for the record, I fully support the comment letter submitted by the Community Forest Advisory Committee. They have been dealing with street tree removals for a long time and understand the realities of what is happening from all vantage points.	This comment expresses support for CFAC comments. Comments submitted by CFAC are responded to in P-1-1 through P-1-43. No further response is required.
<b>I-30: Gregory Wright</b>		
I-30-1	I write as a Los Angeles citizen and resident of Sherman Oaks in Council District 4 to urge the adoption of rules and policies, the consideration of innovative approaches and alternatives, and the expenditure of public and City-required private monies that will maximally protect the largest and grandest trees in Los Angeles City from the environmental impacts of the ongoing Sidewalk Repair Program.	This comment does not raise any environmental issue with the analysis in the DREIR. Please see Master Response No. 1 for comments outside the scope of the DREIR.
I-30-2	I have reviewed the comprehensive "CFAC Comments on Recirculated Portions of the Draft EIR for the SRP - Final.docx-compressed.pdf" prepared by Joanne D'Antonio, Chair of the Community Forest Advisory Committee, and colleagues, and I fully support the suggestions and observations made in that document. These include the need for a true valuation in all tree removal decisions -- and tree replacement policies and ongoing tree care procedures -- of the massive environmental, ecosystems services, biodiversity, public health, decarbonization, and aesthetic value of Los Angeles's tree canopy and of healthy and well-cared for individual trees.	This comment expresses support for the CFAC comments. Please refer to responses P-1-1 through P-1-43.
I-30-3	To the greatest possible extent innovative approaches to repairing sidewalks and pedestrian functionality while also preserving street trees and ensuring their best possible care need to be taken, including curb extensions and bulb-outs, other forms of meandering sidewalks, and the use of interlocking pavers and rubberized sidewalks. Also, I would suggest a reconsideration of the (apparently sidelined) residential "Slow Streets" program in conjunction with the preservation of sidewalk-damaging large trees, whereby the narrowing of streets as a traffic-calming measure could also offer the greater ease of reclaiming auto parking spaces for tree-saving sidewalk extensions! (By the way, Slow Streets should also be purposed as large water-infiltration zones, as street pavers for infiltration would also act as vehicle-slowsing street surfaces!)	<p>Alternatives, including meandering sidewalks, were not required to be, nor were they, recirculated. Please see Master Response No. 1 for comments outside the scope of the DREIR.</p> <p>As indicated in Appendix A of the DREIR, at some locations, it may be possible to meander the sidewalk repair around an existing street tree. In addition, the City considered various alternatives (see Chapter 5 of the 2021 EIR) that included alternative designs and materials. Specifically, Alternatives 7 and 8 of the 2021 EIR considered meandering sidewalks. As discussed in Master Response No. 1, responses to comments are limited to those comments that are relevant to the DREIR.</p> <p>Lastly, the Slow Streets Program is separate from the SRP and beyond the scope of the SRP.</p>

Number	Comment	Response
I-30-4	<p>I have personal experience of the problem of parkway tree destruction for sidewalk repair: In 2015 or '16 a very large mature grand tipuana tree was removed from the parkway in front of 14151 Riverside Drive in Sherman Oaks, a multi-family building immediately east of the building I live in on the north side of Riverside, as a rebate removal -- to correct a modest sidewalk uplift that could have been corrected by ramping -- instigated by a couple in that building (whose south-facing unit, ironically, was shaded by that very large tree). I created a video record of the ugly destruction, over several days, of this tree by a City crew. The tree that was planted to replace it has grown in the near-decade since to a fraction of the removed tree's size, and will not provide any substantial shade until decades from now, if ever. The couple whose rebate request destroyed the tree have long since moved away. Ironically, Mayor Garcetti in 2016 made a public appearance at the site to tout the Sidewalk Repair Program. (A car collision at the nearby dangerous intersection of Riverside and Hazeltine Avenue occurred minutes after the mayor and his entourage departed the scene; but that's another story.)</p>	<p>This comment relays a personal experience. Around March 2016, UFD removed one tipuana tipu tree at 14141 Riverside Drive and another at 14135 Riverside Drive to repair the sidewalk as part of the Project. Four trees were planted and were in good health as of 2023. Please see Master Response No. 1 for comments outside the scope of the DREIR.</p>
I-30-5	<p>It takes a half-century for nature to create a wonderful grand tree, and only a day or two to destroy it. L.A.'s tree canopy could be a much better urban tree canopy than it is. Let's preserve it from climate destruction and global heating -- and from a careless or poorly executed and funded SRP!</p>	<p>This comment expresses an opinion; it does not raise a CEQA-related environmental issue that is subject to recirculation as part of this DREIR. Please see Master Response No. 1 for comments outside the scope of the DREIR. In addition, Master Response 2 addresses comments regarding tree canopy for informational purposes.</p>
<b>XX-31: Coastal San Pedro Neighborhood Council</b>		
I-31-1	<p>Sidewalk Repair Program Draft Environmental Impact Report Resolved, the Coastal San Pedro Neighborhood Council requests that the following be considered in the re-circulated portions of the Final EIR for the Sidewalk Repair Program:</p> <ol style="list-style-type: none"> <li>1. Utilize Southern California native trees, e.g. California Sycamore for replacement</li> <li>2. Implement undulating, meandering, non-linear sidewalks</li> <li>3. Install root barriers</li> <li>4. Implement mandated pruning and maintenance schedules</li> </ol>	<p>Replacement trees and alternatives, including meandering sidewalks, were not required to be, nor were they, recirculated. Please see Master Response No. 1 for comments outside the scope of the DREIR</p> <p>Please see Master Response 2 regarding the selection of replacement trees. Appendix A of the DREIR outlines the considerations for street tree selection. In addition, as indicated in Appendix A, at some locations, it may be possible to meander the sidewalk repair around an existing street tree to allow additional room for root growth; however, if meandering requires an additional sidewalk dedication or easement, this would be beyond the scope of the SRP. Further, Appendix A identifies the specifications for root barriers and pruning.</p>

# Chapter 4

## Revisions to the REIR

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This section of the FREIR provides revisions to the DREIR made to clarify, amplify, or correct the description and environmental impact analysis for the Project. Such changes are a result of public and agency comments received in response to the DREIR, City responses to the comments, and/or additional information that has become available since publication of the DREIR. The revisions described in this section do not result in any new or substantially more severe environmental impacts from the Project (see Section 4.2 for more detail).

### 4.1 Corrections and Additions to REIR and Appendices

The following underlined text has been added to Section 3.4, *Cumulative Impacts on Aesthetics*, page 3-16, paragraph 4, of the DREIR:

As discussed above, the City has reviewed all plans, programs, and programmatic CEQA documents that could evaluate cumulative aesthetic impacts with respect to trees in and around the city. No single document contains such a specific evaluation. However, the City's Mobility Plan 2035 and EIR specifically analyze the complete repair of all city sidewalks and expressly include more limited repair of city sidewalks, as contemplated by the *Willits* Settlement and the Project, and found that aesthetic impacts from such activities would be less than significant. In addition, SCAG's 2016–2040 RTP/SCS and EIR as well as SCAG's 2020 Connect SoCal 2020 RTP/SCS and EIR also specifically analyze, as part of the adopted ATP, the repair of 10,5000 miles of deficient sidewalks and all deficient sidewalks, respectively, and found that such aesthetic impacts would be less than significant, even without a limitation on the amount of trees removed. Furthermore, some projects, plans, and programs indicate that trees in the city and surrounding areas will decrease during the life of the Project, while others indicate that they will increase. As such, any estimate as to the overall net cumulative change in street trees over the life of the Project due to other projects would be speculative. In addition, development under many of these programs is subject to existing requirements that serve to address potential impacts on aesthetics. Private development in the city is generally subject to the design review process, which requires development projects to be designed in accordance with community guidelines and standards. A 2017 study in the journal *Urban Forestry & Urban Greening* showed that development of single-family lots in Los Angeles County resulted in a 1.2 percent annual decrease in tree/shrub cover (5.6 percent of existing tree/shrub cover) and a 0.1 percent annual decrease in grass cover (2.3 percent of existing grass cover) over a 10-year period (Lee et al. 2017). The study did not distinguish between street trees and trees on private property.

The following underlined text has been added to Section 3.5, *Cumulative Impacts on Biological Resources*, page 3-21, paragraph 2:

Some projects, plans, and programs indicate that trees in the city and surrounding areas will decrease during the life of the Project, while others indicate a net increase. As such, any estimate as to the overall net cumulative change in street trees over the life of the Project due to other projects would be speculative. In addition, development under many of these programs is subject to existing requirements that serve to address potential impacts on biological resources. Private development in the city is generally subject to the protected tree ordinance, which requires replacement of removed protected trees at a minimum ratio of 4:1. Notwithstanding, a 2017 study in the journal *Urban Forestry & Urban Greening* showed that development of single-family lots in Los Angeles County resulted in a 1.2 percent annual decrease in tree/shrub cover (5.6 percent of existing tree/shrub cover) and a 0.1 percent annual decrease in grass cover (2.3 percent of existing grass cover) over a 10-year period (Lee et al. 2017). The study did not distinguish between street trees and trees on private property.

## 4.2 Effects of Corrections and Additions

The additions to the DREIR provide supplemental information but do not change the conclusions in the DREIR. The overall conclusion of the 2017 study is consistent with the DREIR's cumulative impact analysis, which concluded that plans evaluated indicate that ongoing changes to trees in the City show that there could be significant cumulative impacts on aesthetics and biological resources, but that the Project's contribution to such impacts would not be cumulatively considerable.

# Chapter 5

## FREIR References

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