

Sidewalk Repair Program Draft Environmental Impact Report Introduction and Background (from the Executive Summary) and proposed comments to be considered for submission by the Northridge South Neighborhood Council Board

Further information and the full report can be found at:
<https://sidewalks.lacity.org/environmental-impact-report>

Introduction and Background

This Environmental Impact Report (EIR) evaluates the City of Los Angeles' (City) proposed Sidewalk Repair Program (Project) under the California Environmental Quality Act (CEQA). Per CEQA, the City is the lead agency. This executive summary provides an overview of the Project and its environmental effects.

The Project is a Citywide program to modify the manner in which sidewalk repair projects are undertaken pursuant to the City's obligations under the *Willits* Settlement Agreement (Settlement), which includes various City actions that provide improved access to persons with mobility disabilities in accordance with local, state, and federal accessibility requirements. The Project is an infrastructure project and consists of continuation of sidewalk repairs; curb ramp repairs; crosswalk paving; street tree retention, removal and replacement; canopy pruning; root pruning; and applicable utility work for 30 years within the City.

Currently, the City is complying with the Settlement using existing ordinances and policies. The existing process requires case-by-case review and approval of each sidewalk repair project funded as a result of the Settlement. With the Project, the City is proposing to adopt a new ordinance to revise the way sidewalk repairs undertaken pursuant to the *Willits* Settlement are reviewed and approved, with a primary goal of streamlining the Settlement implementation process, including ministerial review of certain individual sidewalk repairs.

Under the Project, impacts in individual construction projects would generally be less than significant, except in: (1) some construction projects where, despite adherence to program design features (PDFs), which include regulatory compliance measures and other standard conditions, impacts would be significant and unavoidable where sensitive uses are in close proximity to certain noise and vibratory sensitive receptors; and (2) rare construction projects where, despite adherence to PDFs, impacts would be significant and unavoidable for certain aesthetic, cultural resources, and tribal cultural resources impacts.

The EIR process, as defined by CEQA, requires preparation of an objective, full-disclosure document to: (a) inform agency decision makers and the general public of the direct and indirect environmental effects of a proposed project; (b) identify, where feasible, mitigation measures to reduce or eliminate any identified significant adverse impacts; and (c) identify and evaluate alternatives to the proposed project that might lessen or avoid some or all of the identified significant impacts of the project.

Comment to be Considered for Submission

The proposed draft of the Environmental Impact Report (report) for the Sidewalk Repair Program (project) is inadequate in that it does not consider any impacts from the loss of trees that are removed and only includes a very limited number of alternatives to tree removal. The report concludes that because the project is net neutral, “the amount of street tree canopy cover removed as a result of sidewalk repairs over the life of the Project would be completely offset by the growth in replacement street tree canopy cover by year 30 of the Project” the environmental impacts are minimal and therefore do not need to be mitigated. The report overlooks the fact that trees provide numerous invaluable ecological and human benefits including: conserve water, reduce soil erosion, increase wildlife and plant diversity, act as natural water filters, add beauty, improve personal health, reduce air pollution, save energy, modify local climates, increase economic stability, reduce noise pollution, and increase property values. The 2019 First Step Developing an Urban Forest Management Plan for the City of Los Angeles by Dudek (www.cityplants.org/wp-content/uploads/2019/07/10939_LA-City-Plants_FirstStep_Report_FINAL_updt_7-2019.pdf) states that “there will be a period of reduced benefits and landscape-level changes” caused by the tree removals.

An estimated 12,860 trees will be removed over the 30-year lifetime of the project (about 12% of the total tree canopy, 4,669 acres, is located in CD 12). The estimated tree removal rate will increase over time from 292 per year, on average, at the beginning of the project to 594 near the end. The Dudek Plan also states that “the loss of 10,000 trees at a rate of 330 per year would be “a measurable loss of community benefits/services, since the majority of the trees removed are likely to be larger trees that contribute exponentially higher urban forest benefits”.

The estimated size of the trees being removed is 38.5 feet in diameter with a canopy cover of 1,166 square feet, whereas the estimated size of the replacement trees is 30.5 feet in diameter with a canopy cover of 730 square feet (only 62.6% of the removed trees). Therefore, even though tree replacement will be at a ratio of 1:2 or 1:3, there will not only be the initial decrease in environmental benefits, there will be long term ones as well.

Given the ecological importance of larger mature trees it is imperative that every tree that can be saved, be saved. The project only includes five alternatives to tree removal, many of which can only be used in limited circumstances. Root pruning, in most cases, will not be an option because too much of the tree’s roots will need to be removed. Meandering sidewalks will not be used if it will require the acquisition of private property right of way. Ramping might not be used because of concerns it may void the sidewalk warranty. That leaves widening street tree wells to 4’ x 6’ as needed and sidewalk minimizing (narrowing) both of which are dependent on the sidewalk being wide enough to implement. There are numerous other well established methods of sidewalk repair that do not require tree removal including: Slabjacking (AKA mud jacking or leveling); rock dust to replace sections where slabs are raised, cracked or broken; rubber sidewalks; bridging the sections where roots are located; sand, washed gravel or foam underlay as a sub-base for sidewalk material; reinforced concrete, expansion joints, pervious concrete, curb realignment, suspended pavement systems, root barriers, and steel plates over the roots.

As written, the draft report lacks the information necessary to be the basis for an Environmental Impact Report and needs to be revised to include the environmental impacts from the removal of existing trees and a more thorough analysis and inclusion of tree removal alternatives that can reduce those impacts.