



Los Angeles County
Department of Regional Planning

Planning for the Challenges Ahead



Richard J. Bruckner
Director

July 31, 2014

TO: Esther L. Valadez, Chair
Laura Shell, Vice Chair
David W. Louie
Curt Pedersen
Pat Modugno

FROM: Carmen Sainz, Supervising Regional Planner
Community Studies East Section

SUBJECT: **TREE PLANTING ORDINANCE**
PROJECT NO. R2007-02988
ADVANCE PLANNING CASE NO. 201400003
HEARING DATE: AUGUST 13, 2014
ITEM 6

On June 25, 2014, the Regional Planning Commission held a public hearing on the proposed Tree Planting Ordinance that would amend Title 21 (Subdivisions) and Title 22 (Planning and Zoning) of the Los Angeles County Code to repeal the drought tolerant landscaping and green building requirements at Sections 21.24.430 and 21.24.440 and Parts 20 and 21 of Chapter 22.52 that are now found in Title 31; and establish tree planting requirements for new projects. At that hearing, the Commission directed Regional Planning staff to revise the proposed ordinance to address concerns regarding applicability, tree planting location requirements and potential sidewalk damage from the trees. Consequently, the Commission continued this item to August 13, 2014.

On July 25, 2014, TreePeople, an environmental organization, provided the attached correspondence commenting on the proposed ordinance. Of particular interest is their concern about mature canopy size and spacing of trees which would affect how required trees are quantified. To give this matter further consideration, staff is requesting that this item be continued to October 8, 2014.

SUGGESTED MOTION

I move that the Regional Planning Commission continue the public hearing to October 8, 2014.

If you have any questions regarding this project, please contact **Dean Edwards** at (213) 974-6425 or dedwards@planning.lacounty.gov, Monday through Thursday from 7:30 AM to 5:30 PM. Our offices are closed on Fridays.

Attachment: Correspondence

CS: de

From: Linda Eremita [mailto:leremita@treepeople.org]
Sent: Friday, July 25, 2014 11:45 AM
To: Dean Edwards
Cc: Julie Prejean; Chris Imhoff
Subject: RE: Benefits of trees

Hi Dean,

First let me say that we at TreePeople are happy and hopeful that the heart and purpose of this ordinance is to increase the canopy coverage in the county. There are however some elements of the ordinance that will prevent and hinder the achievement of that purpose.

I'm so very glad that you've asked for comments on the species size requirements. A 10' tall 5 gallon tree will be a root bound tree - one that is unacceptable to plant, for it will never grow a sound root structure because of circling and kinked roots. Even some 15 gallon trees are not 10' tall. This would limit the species of trees allowed to be planted; trees that otherwise would be very appropriate and beneficial. I believe that 5 or 15 gallon trees are appropriate. There are many more 15 gallon-sized trees available rather than 5 gallon. But as the ordinance says, a small tree will become established faster. We definitely agree on that point.

Instead, trees from the nursery should be judged on their **caliper (trunk diameter) measured 6 inches above the soil line**. This gives a much more accurate accounting of the trees' maturity appropriateness for the particular pot size.

Here is the industry standard from **Urban Tree Foundation** that has been adopted by CalFire, the Western Chapter of the ISA (International Society of Arboriculture) and California ReLeaf:

- **5 gallon trees should have a caliper between .5" to .75"**
- **15 gallon trees should have a caliper between .75" to 1.5"**
- **24" box trees should have a caliper between 1.5" to 2.5"**

Here is the link to Urban Tree Foundation's **Guideline Specifications to Nursery Tree Quality** <http://www.urbantree.org/specs.asp>. I believe that all of these standards should be applied and followed. I've seen far too many poor quality trees planted, knowing that they will never reach anything sizeable without having structural problems (read – hazards).

Secondly a tree with a 25' canopy spread is considered a small stature tree, appropriate for the smallest of concrete cutouts. And the requirement that a tree be planted for every 25' of frontage means that you can only plant these small stature trees. That GREATLY limits the species that could be planted to just a handful. As you'll find in The Large Tree Argument, we need to be planting the largest trees appropriate for a site, not the smallest. I suggest perhaps changing the spec to read something along the lines of, "Trees shall be planted so that their canopies shall touch at maturity" or that the spread be within 80% of that... It is far better to plant fewer larger trees, than more shorter/smaller trees. **You'll achieve much greater canopy cover with larger trees, which is the whole heart of purpose of this ordinance.**

Also the species should be dictated by the size of the space or concrete cutout/parkway width and if there are overhead wires. This prevents a tree from being planted in too small a space, whether it be a parkway or a parking lot. Far too many parking lots are filled with large trees in teeny asphalt cutouts or islands. I'm sure it's to satisfy the tree requirement, but it means tree or asphalt failure in the future. The city of L.A.'s Urban Forestry Division has done a pretty good job of defining the minimum parkway widths for all the species on its approved tree list. Once the tree list for this ordinance has been compiled, I suggest assigning an appropriate planting area.

Currently I'm working with the City of Los Angeles and the partner organizations with City Plants to revisit the city's approved street tree list. We are removing many trees from the list that are proving to have poor performance under water restrictions/drought/climate change, and have other issues (pests, diseases, branch failure, not available locally, hard to establish, too messy, etc). I am happy to share that with you once we are done.

And I know you're not asking for more than this, but I must say you should remove using "guy wires" in the specs. Staking with **soft rubber ties** and 2 stakes should be quite adequate for a 5 or 15 gallon tree. Never use wires with trees. In addition to possibly cutting into the trunk, even if the wire is passed through a piece of rubber tubing, the wires present a trip hazard since they connect to the ground at a wide angle from the trunk. Not good along a sidewalk!

I hope this was helpful from the perspective of an ISA certified arborist. Let me know if you have more questions.

All the best,

Linda Eremita
Forestry Education Manager
ISA Certified Arborist (#WE-5733A)
TreePeople
direct 818 623 4878 | main 818 753 4600 | 12601 Mulholland Drive | Beverly Hills, CA 90210
www.treepeople.org
Support TreePeople and a greener, more viable LA. [Donate now!](#)