



Via email- alan.como@lacity.org

January 19, 2021

Alan Como

Department of City Planning

221 N. Figueroa St., Suite 1350

Los Angeles, Ca 90012

Re: Berggruen Institute Project

ENV-2019-4565-EIR

Dear Mr. Como, Mayor Garcetti and Councilmember Bonin:

Angelenos for Trees is a community group that unites Los Angeles neighborhoods to preserve and regenerate Los Angeles' rapidly shrinking tree canopy.

The proposed Berggruen Institute Project (the "Project") is slated to be located in the Santa Monica Mountains, considered a biodiversity hotspot that is part of the California Floristic Province. There are only 36 recognized biodiverse hotspots in the world and to qualify the region must have 1500 species of vascular endemic plants and have lost up to 70% of its primary vegetation¹. The California Floristic Province is recognized as an important and threatened ecological resource hosting unique species.

This Project (i) significantly impacts some of the last remaining habitats of protected *Juglans californica* (California Black Walnut) by proposing to remove between 58-73 mature trees^{**}; (ii) fails to recognize the importance of open space and the resilience of native habitat in a very High Severity Fire Zone; (iii) fails to protect the biological, recreational and visual resource values of the 20,000 acre contiguous core habitat area known as the Big Wild; and (ii) accelerates the already rapidly declining Los Angeles Tree Canopy by removing between 64-188 trees (including the 58-73 California Black Walnut Trees) from the entire Project area.

The recently released 2020 Los Angeles Biodiversity Report² (the "Report") is intended for use by City Staff, science experts and the general public. The Report is intended as a tool to assist the City reach the goal of no net biodiversity loss as set forth in Mayor Garcetti's Green New Deal pLAN. It sets forth guidelines for City Planning Staff³ identifying various Resource and Conservation goals and objectives

^{**} All tree counts set forth in this letter have been taken from the 2019 Environmental Assessment Form Section D

¹ <https://www.cepf.net/our-work/biodiversity-hotspots/hotspots-defined>

² <https://www.lacitysan.org/san/sandocview?docname=cnt052553>

³ <https://www.lacitysan.org/san/sandocview?docname=cnt052544>

including but not limited to maintaining, preserving, and protecting natural plant and wildlife habitat diversity, habitats corridors, and linkages. The guidelines recognize the threat of urbanization as it encroaches on these unique and sensitive habitats such as the Santa Monica Mountains.

The Biodiversity Atlas of LA (“Atlas”) urges the conservation of current populations of the Southern California Black Walnut⁴. Further, the Atlas highlights the California Black Walnut is threatened due to urbanization and potentially by lack of natural reproduction (the result of habitat fragmentation due to development). It is an important biodiverse tree that supports 100’s of birds, insects, rodents and other habitat.⁵ Further, as the Project is in a High Severity Fire Zone, as has been demonstrated almost annually by recent fires, the ability of the California Black Walnut to survive and regenerate from these fires is invaluable.

Further, the Project proposes removing more protected trees including 6-7 *Quercus Californica* (California Live Oaks), 8-9 *Platanus Racemosa* (Western Sycamores) and potentially 3 *Umbellularia Californica* (California Bay Laurel). Each of these trees have unique biodiverse attributes and when viewed with the removal of the California Black Walnuts it is clear the Project will result in the removal of a threatened habitat and the further disruption of contiguous space that allows wildlife to roam.

The proposed sapling replacement for these trees is inadequate. Current science suggests that the removal of one mature tree and replacing them with saplings does not sufficiently address the loss of the canopy and/or habitat. It can take up to 10, 20 or even 50 years for a tree to mature and provide the environment replacement benefit.⁶ Newly planted trees face a mortality rate of up to 17% in their first few years after planting.⁷ The challenges associated with saplings reaching maturity is highlighted when reading the Protected Tree Inventory Report where Dudek points out projected replacement tree canopy will only mature after 20 years. Los Angeles is facing a climate crisis now. It cannot afford to wait 20 years for these trees to mature. Finally, the Protected Tree Inventory Report prepared in 2017 needs to be updated as the City’s current tree protection ordinance was recently modified to include Toyon and Mexican elderberry.

Los Angeles’ tree canopy is an important resource in fighting climate change. Tree canopies can lower temperatures more than 10 degrees, provide important watershed management, sequester CO2 emissions, and clean the air. For every dollar spent on trees per annum over \$5.82 in benefits are generated.⁸

The loss of between 64 to -188 mature trees negatively impacts the tree canopy significantly. Within the past two decades, according to a study conducted by USC, Los Angeles lost up to 55% of its urban tree canopy. TreePeople and Loyola Marymount Center for Urban Resilience released findings that in 2016, the City of Los Angeles had a tree canopy cover of 25%. To receive the maximum benefits of a tree canopy, Los Angeles needs to be closer to 45%.

⁴ <https://biodiversityla.org/species/iconic/ca-black-walnut/>

⁵ <https://www.fs.fed.us/database/feis/plants/tree/jugcal/all.html>

⁶ <https://californiareleaf.org/saveourtrees/faqs/>

⁷ https://www.fs.fed.us/psw/publications/documents/psw_gtr207/psw_gtr207.pdf

⁸

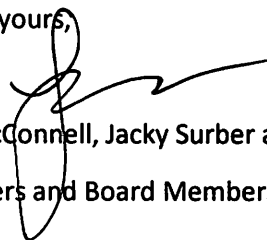
<https://www.sciencedaily.com/releases/2016/06/160614212452.htm#:~:text=Researchers%20concluded%20that%20for%20every,trees%20returned%20%245.82%20in%20benefits.&text=With%20an%20estimated%209.1%20million,tree%20for%20every%20four%20residents.>

In a recent study by The Los Angeles Urban Cooling Collaborative⁹ report contains the key findings that (i) climate change induced warming in Los Angeles could be delayed by 25-60 years by increasing the tree canopy and reflectance; and (ii) in heat waves 1 to 4 lives that are lost could be saved.

It is projected, depending on where you are located in Los Angeles, that the number of days over 95 degrees could triple.¹⁰ Already people are dying of extreme heat in Los Angeles¹¹. Los Angeles has the dubious distinction of having the worst air quality nine out of the last 10 years of any city in the United States. And sadly, this year the air quality in Los Angeles was the worst it has been in 26 years.¹²

Mayor Garcetti, in his Green New Deal pLAn, pledged that the 2020s would be a decade of action. We urge the City to turn down this Project and instead focus on conserving, restoring, and maintaining this ecologically diverse and sensitive area.

Very truly yours,



Jeanne McConnell, Jacky Surber and Jill Stewart

Co-Founders and Board Members

⁹ <https://www.treepeople.org/sites/default/files/pdf/publications/RX-for-hot-cities-report.pdf>

¹⁰ <https://la.curbed.com/2019/8/19/20726773/los-angeles-hotter-temperature-climate-change>

¹¹ <https://oehha.ca.gov/epic/impacts-biological-systems/heat-related-mortality-and-morbidity>

¹² <https://ktla.com/news/local-news/downtown-l-a-experiences-worst-smog-in-26-years/>