November 16, 2026

Office of Forest Management
Los Angeles Department of City Planning
200 N. Spring Street, Los Angeles, CA 90012

Re: Public Comment on the City of Los Angeles Urban Forest Management Plan (Public Comment Draft, November 2026)

Dear Office of Forest Management and City Planning Team,

Thank you for releasing the City of Los Angeles's first comprehensive Urban Forest Management Plan (UFMP). The draft sets a clear direction by pairing a 25% citywide canopy goal by 2035 with a 15% minimum canopy floor for every neighborhood, rather than relying on a citywide average that masks severe local disparities. Its reliance on the Tree Canopy Equity Priority Index, a mandatory five-year establishment care period, and 5–10–20 species diversity standards reflects sound urban forestry science. Equally important is the draft's candor about where the City currently stands: spending roughly $30 million a year against an estimated $118 million annual need (in 2022 dollars) and operating street tree pruning on a 17-year cycle.

Our primary concern is that the draft stops short of the binding authority and dedicated funding required to execute those goals. Between 80% and 90% of Los Angeles's tree canopy grows on private land, while public trees are divided among multiple City departments and proprietary agencies. Relying on advisory guidance and soft directives ("assess," "consider," "explore") risks repeating the unfulfilled recommendations of earlier City audits. Before adoption, we urge City Planning and the City Council to strengthen the Final UFMP and its initial Five-Year Implementation Plan in five concrete ways:

1. Give the Office of Forest Management binding design-review authority. Moving OFM into City Planning aligns urban forestry with land-use policy, but OFM still lacks operational control over asset-managing bureaus. Using the Charter and Administrative Code updates outlined in Chapter 3, the City should require formal OFM sign-off on all Capital Improvement Projects, Bureau of Engineering (BOE) streetscape redesigns, and utility upgrades prior to construction. Canopy minimums and soil-volume standards must be enforced upfront rather than value-engineered out in the field.

2. Replace voluntary studies with enforceable interdepartmental agreements. Discretionary coordination items in the five-year work plan should be converted into binding, time-bound Memoranda of Understanding modeled on the City's Master Cooperative Agreement with Metro. Specifically, the City should execute an OFM–StreetsLA–RAP–LADWP Utility Coordination MOU within 12 months of plan adoption to bring LADWP powerline clearance into compliance with ANSI A300 structural pruning standards and establish a phased replacement schedule for incompatible large-stature trees beneath overhead lines.

3. Consolidate fragmented tree jurisdictions and unify asset inventories. The Los Angeles Municipal Code should be amended immediately to transfer maintenance responsibility and dedicated staffing for all uninventoried "orphan" trees at the General Services Department's 608 City facilities and 270 vacant or surplus parcels to Recreation and Parks Forestry. At the

same time, the City should advance the Chapter 3 proposal to create a unified Bureau of Green Infrastructure within Public Works, finalize UFD's Street Tree Manual, and require proprietary agencies (LADWP, LAWA, and the Harbor Department) to log their inventories in a single shared enterprise asset management system.

4. Adopt binding civil engineering standards and close private-property protection gaps. OFM and BOE should adopt enforceable Standard Plans for minimum uncompacted soil volumes and suspended pavement systems alongside street-typology canopy requirements. On private property, protections must extend beyond the six native species covered by the Protected Tree and Shrub Ordinance (PTO) so mature non-native shade trees are preserved during infill development. As part of that reform, the City should establish a private-property tree removal mitigation and in-lieu fee system—modeled on Seattle's Payment-in-Lieu fund and Melbourne's Urban Forest Fund—to generate immediate stop-gap revenue for neighborhood planting, five-year establishment care, and canopy expansion in low-canopy neighborhoods while permanent General Fund or ballot funding is secured. The City should also adopt uniform administrative criteria for the PTO's 10-year building permit revocation penalty and replace in-person officer witness rules for street tree violations with administrative fines based on an Amenity Tree Valuation Formula.

5. Ring-fence forestry budgets and commit to a dedicated ballot measure. Working with the City Administrative Officer, OFM should compile a unified, cross-departmental "Living Infrastructure" budget roll-up—aligned with the two-year budget cycle proposed in the April 2026 Charter Reform Commission Report—that shields forestry positions from mid-year salary-savings deletions. The City should also immediately establish the Urban Forester and Urban Ecologist civil service classifications and set a firm target date to place a dedicated, revenue-indexed urban forestry funding measure on the ballot.

With the LA28 Olympic and Paralympic Games approaching and climate change bringing hotter summers, prolonged drought, and heavier storms to Southern California, this is the moment for Los Angeles to be brave and act decisively. Urban trees are working public infrastructure: they provide shade that can cut outdoor "feels-like" temperatures by 30°F to 70°F, filter air pollution, and intercept rainfall to increase rainwater capture and reduce stormwater runoff, protecting public health and improving daily life across our neighborhoods. By pairing this plan's equity and scientific framework with binding interdepartmental authority, private-property protections, and reliable multi-year funding—approaches already proven in San Francisco, Seattle, and Melbourne—Los Angeles can build a lasting LA28 legacy and ensure that historically under-canopied and renter-majority communities finally receive their fair share of shade. We urge City Planning and the City Council to write these commitments directly into the Final Urban Forest Management Plan and its first Five-Year Implementation Plan.

Sincerely,

Theodore Wiggins
Council District 4

Appendix A: Legal & Funding Benchmarks from Peer Cities

The governance and financing mechanisms recommended in the preceding comment letter reflect established policies in San Francisco, Seattle, and Melbourne. Each city faced severe maintenance backlogs, split departmental authority, and canopy loss on private parcels, and addressed them through binding ordinances, Charter provisions, and dedicated funding streams.

City	Governance & Legal Authority	Private Property & Development Rules	Dedicated Funding Structure
San Francisco	2016 City Charter Amendment (Prop E) & Public Works Code Art. 16 transferring street tree and sidewalk liability to Public Works.	Street tree planting and removal permits enforced by the Bureau of Urban Forestry; Landmark and Significant tree protections.	Charter-mandated General Fund set-aside ($19M+ initial baseline, indexed annually to discretionary City revenues) for StreetTreeSF maintenance; Prop L and grants for planting.
Seattle	Executive Order 2013-03 establishing a 10+ agency Interdepartmental Team (IDT) alongside an advisory Urban Forestry Commission.	SMC Chapter 25.11 (2023): four-tier private tree protection down to 6" DSH, mandatory five-year replacement care, public notice, and contractor registry.	Annual cross-departmental Urban Forest Budget Roll-Up, utility ratepayer funds (City Light / Public Utilities), and Payment-in-Lieu mitigation fees (Director's Rule 8-2023).
Melbourne	Urban Forest Strategy (2012–2032), Precinct Plans, and binding Tree Retention & Removal Policy requiring pre-work City Arborist sign-off.	Planning Scheme Overlays (C212/C379) protecting Exceptional Trees; mandatory Arboricultural Impact Assessments and Tree Protection Bonds.	Amenity Tree Valuation Formula full-cost recovery for removals and damage, plus the Urban Forest Fund (dollar-for-dollar matching grants for private greening).

San Francisco: Charter-Protected Maintenance Funding and Liability Transfer

San Francisco confronted a deferred-maintenance backlog very similar to Los Angeles's, with street tree pruning cycles stretching beyond ten years and property owners declining new trees out of fear of sidewalk repair liability. In November 2016, voters approved Proposition E, amending the San Francisco City Charter to establish a permanent, non-discretionary annual General Fund set-aside for StreetTreeSF. Starting at $19 million in FY 2017–18, the allocation adjusts automatically each year with changes in aggregate discretionary General Fund revenues, preventing departmental managers or annual budget cuts from raiding tree care funds. Proposition E also amended Public Works Code Article 16 to shift maintenance responsibility and legal liability for roughly 125,000 street trees and tree-root-damaged sidewalks from adjacent property owners to Public Works, while separate capital sources such as Proposition L and state grants fund new plantings and three-year establishment watering.

Seattle: Interdepartmental Coordination, Tiered Private Tree Rules, and Budget Roll-Ups

Because Seattle's urban forest responsibilities are divided across transportation, parks, electric and water utilities, and land-use permitting—with most canopy located on private lots—Executive Order 2013-03 institutionalized an Interdepartmental Team (IDT) on Urban Forestry uniting more than ten municipal agencies. The IDT coordinates canopy targets, aligns utility line clearance with arboricultural standards, and publishes an annual cross-departmental Urban Forest Budget Roll-Up so forestry cuts cannot be hidden inside larger agency budgets. On private land, Seattle's updated Tree Protection Ordinance (SMC Chapter 25.11, effective 2023) regulates trees across four tiers down to 6 inches DSH, prohibiting removal of Tier 1 Heritage Trees and restricting removal of Tier 2 significant trees during development. Where removals are permitted, developers must replant to achieve proportional canopy cover—backed by a mandatory five-year maintenance and monitoring requirement—or pay into a dedicated Payment-in-Lieu of Tree Replacement Fund under Director's Rule 8-2023. Commercial tree companies must also join a public Tree Service Provider Registry and post online notices before cutting regulated trees.

Melbourne: Amenity Valuation Enforcement and Public-Private Co-Investment

Melbourne manages its 70,000 public trees as a municipal infrastructure portfolio valued at more than $700 million, relying on pre-construction engineering sign-offs and civil cost recovery rather than criminal prosecution to deter tree damage. Under its Tree Retention and Removal Policy, any private developer or municipal project working near a public tree must submit an Arboricultural Impact Assessment and Tree Protection Plan approved by a City Arborist and post a Tree Protection Bond before work begins. If a public tree is approved for removal—or illegally pruned or destroyed—Melbourne applies its Amenity Tree Valuation Formula alongside i-Tree Eco modeling to bill the applicant or violator for the full monetary value of the lost canopy (often tens of thousands of dollars per mature tree) plus removal and replacement costs. On private land, which holds roughly 75% of Melbourne's canopy, Planning Scheme Overlays (Amendments C212 and C379) protect trees on the Exceptional Tree Register. Developer compensation payments and municipal seed funding flow into Melbourne's Urban Forest Fund, which provides dollar-for-dollar matching grants for private-property tree planting, green roofs, and stormwater upgrades alongside direct rebates helping homeowners care for registered Exceptional Trees.

Appendix B: Referenced Plans, Ordinances & Policy Resources

Los Angeles

Los Angeles City Planning — Office of Forest Management (OFM) — Urban Forest Management Plan hub and Tree Canopy Equity Priority Index.

City of Los Angeles Protected Tree and Shrub Ordinance (LAMC § 46.00–46.06) — Municipal code governing protected native tree and shrub species.

City of Los Angeles Charter Reform Commission (April 2026 Final Report, Council File 26-0489) — Recommendations on governance, multi-year budgeting, and Charter updates.

LA Recreation and Parks — Urban Forest Program Manual — Operational standards and tree preservation guidelines for City parkland.

First Step: Developing an Urban Forest Management Plan for the City of Los Angeles (City Plants / Dudek) — Baseline canopy assessment, private property share, and peer-city benchmarks.

Los Angeles Community Forest Advisory Committee (CFAC) — Citizen advisory committee on street tree policy, coordination, and funding.

San Francisco

San Francisco Public Works — StreetTreeSF Program — Routine 3–5 year street tree pruning cycles and sidewalk repair operations.

San Francisco Public Works — StreetTreeSF FAQ — Proposition E liability transfer, maintenance scope, and permitting rules.

San Francisco Proposition E (November 2016) Charter Amendment — Ballot measure establishing the revenue-indexed annual General Fund set-aside.

Seattle

Seattle Department of Construction & Inspections — Trees & Codes (SMC Chapter 25.11) — Four-tier private tree protection rules, Tree Protection Areas, and contractor registry.

SDCI Director's Rule 8-2023 — Payment in Lieu of Tree Replacement — Fee schedule and trunk cross-sectional area calculation under SMC 25.11.110.

Seattle Tree Protection Code Overview (Ordinance 126821 / SMC 25.11) — Summary of Tier 1–4 thresholds, five-year replacement care, and public notice rules.

City of Seattle Urban Forest Stewardship Plan (Resolution 31477) — Interdepartmental coordination framework and citywide canopy targets.

Melbourne

City of Melbourne — Urban Forest Strategy (2012–2032) — Targets for 40% public canopy, 5–10–20 diversity, soil moisture, and cooling.

City of Melbourne — Tree Retention and Removal Policy & Valuation Guidelines — Arborist sign-offs, Tree Protection Bonds, and Amenity Tree Valuation rules.

City of Melbourne — Urban Forest Fund — Dollar-for-dollar matching grant program for private-realm greening.

Biophilic Cities Case Study — Melbourne's Tree Valuation Method — Overview of Melbourne's amenity, reinstatement, and i-Tree ecological valuation formula.