

McMillan, Acquanette (Netta)

From: William M. Paparian
Sent: Thursday, July 16, 2026 7:31 PM
To: PublicComment-AutoResponse; Jomsky, Mark
Subject: Meeting of 07/20/2026 - Agenda Item 12 - Sierra Madre Median Enhancement Project

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Dear Mayor Gordo and Honorable Members of the Pasadena City Council,

The Pasadena City Council has strongly opposed the removal of mature trees by Pasadena Unified School District, citing our Tree Protection Ordinance and the need to preserve Pasadena's urban canopy. Yet City Staff is advancing a project that will remove 44 mature trees on Sierra Madre Boulevard for the median enhancement project. This inconsistency is striking. If protecting mature trees is a priority worth fighting for on school grounds, it should also apply to our public streets. After the devastating losses from the Eaton Fire, Pasadena cannot afford selective tree protection. I urge the Council to apply the same high standard to its own projects

I respectfully request that the Pasadena City Council place the vegetation management and tree removal aspects of the Sierra Madre Median Enhancement Project on an upcoming agenda of the Public Safety Committee for review. I further request that the Committee direct the Pasadena Fire Department to conduct a formal evaluation of potential wildfire hazards created by the current project design.

While the project's stormwater capture and urban greening goals are valuable, certain elements — particularly the proposed removal of 44 healthy, mature trees and the installation of a multi-layered native plant palette — may inadvertently increase public safety risks in this corridor.

Key public safety concerns include:

- **Ladder Fuel Creation:** State defensible space laws require the elimination of ladder fuels that allow fire to climb from ground vegetation into tree canopies. The current plan appears to introduce exactly this risk by planting low, resinous, high-volatile native species (such as chamise or certain sages) in a multi-layered system along a heavily traveled urban corridor subject to Santa Ana wind-driven fire behavior.
- **Net Canopy Deficit and Heat Impacts:** Replacing mature, shade-producing trees with lower-growing vegetation creates an immediate loss of canopy cover. This can intensify localized urban heat island effects, dry surface fuels faster, and worsen fire behavior — outcomes that conflict with California's Urban Forestry Act and broader climate resilience goals.
- **Plant Palette and Fire Resistance:** A rigid preference for certain chaparral-type "native" species may not be optimal in an urban WUI-adjacent or firebreak context. Higher-moisture, lower-volatility California natives or Mediterranean-adapted alternatives (e.g., *Frangula californica* / Coffeeberry, *Heteromeles arbutifolia* / Toyon, *Prunus lyonii* / Catalina Cherry) would better support both stormwater goals and fire safety.

Recommended Actions:

1. Direct the Pasadena Fire Department to review the project's plant palette, bioswale design, and tree removal plans for consistency with local Fire Hazard Severity Zone standards, and defensible space requirements. Request a written assessment of whether the design could increase wildfire risk or ladder fuel hazards.
2. Consider recommending an "Urban Firebreak Variance" for this and similar corridors. Suggested policy language:

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*“Any state-mandated native plant transition or stormwater infrastructure project in a designated Wildland-Urban Interface (WUI) or historical firebreak zone shall be granted a safety variance. Existing healthy, mature, non-invasive ornamental trees (trunk diameter >12 inches) shall be grandfathered as fire-neutral infrastructure. High-volatile, resinous native plant families (e.g., *Adenostoma*, certain *Salvia*) shall be prohibited, while fire-safe, drought-tolerant riparian natives or Mediterranean alternatives shall be permitted.”*

3. Request staff to return with redesigned alternatives that maximize retention of the existing mature trees while still meeting Safe Clean Water Program objectives (e.g., narrower bioswales, root protection zones, tree wells, and adjusted grading).

Early intervention can help Pasadena avoid creating a preventable public safety liability while still achieving environmental benefits. Thank you for your commitment to protecting Pasadena residents from wildfire risks.

I also write to urge the City to immediately pause any further actions on the Sierra Madre Boulevard Median Enhancements Project that could result in the removal or injury of the 44 mature trees located in the public medians. The City must first demonstrate full compliance with its own Tree Protection Ordinance (Pasadena Municipal Code Chapter 8.52) and applicable requirements under the California Environmental Quality Act (CEQA).

Pasadena’s Tree Protection Ordinance expressly recognizes that the City is “graced by the presence of thousands of mature trees that contribute long-term aesthetic, environmental, and economic benefits to the city” and states that its purpose is “to preserve and grow Pasadena’s canopy cover.” Under the ordinance, mature trees (those with a diameter at breast height of 19 inches or greater) and public trees (those located in medians, rights-of-way, and other City-controlled property) receive automatic protection by operation of law. This protection is not discretionary or subject to after-the-fact designation—it exists once a tree meets the established criteria.

The burden therefore rests squarely on the City, as project proponent, to demonstrate:

1. That removal or significant injury to these trees is necessary;
2. That feasible alternatives preserving the mature trees have been thoroughly evaluated; and
3. That any proposed mitigation is adequate and consistent with the ordinance’s goal of preserving and expanding canopy cover.

This approach aligns with established municipal tree-protection practices across California, including ordinances in cities such as Lafayette, Sonoma, Clovis, and Temecula, which treat mature and heritage trees as public resources warranting strong procedural safeguards and a general presumption in favor of preservation.

In addition, because this is a public project involving discretionary City approvals and the potential removal of a significant number of mature trees, full compliance with CEQA is required. This includes proper identification of environmental impacts, meaningful analysis of feasible alternatives that avoid or minimize tree loss, evaluation of urban-forest and biological resources, and the preparation of an administrative record supported by substantial evidence — not conclusory statements.

Mature trees provide immediate and substantial public benefits, including canopy cover, carbon sequestration, stormwater interception, urban heat reduction, wildlife habitat, and enhanced property values. These benefits cannot be replaced in the short or medium term by planting nursery stock saplings. Professional arboricultural valuation methods typically assign replacement costs of many thousands of dollars per mature tree. Numerical replacement ratios alone do not satisfy the City’s legal obligation to preserve and grow the urban canopy.

I therefore respectfully request that the City Council direct staff to:

1. Immediately cease any actions that could harm the 44 mature median trees until the requirements of the Tree Protection Ordinance are fully satisfied;

2. Prepare and publicly release a complete analysis, including arborist reports, biological assessments, and engineering studies, demonstrating why preservation is not feasible and documenting the evaluation of reasonable alternatives;
3. Evaluate any trees meeting the criteria for Landmark Tree status for formal designation;
4. Ensure that any proposed mitigation is meaningful, proportional, and capable of replacing the lost mature canopy functions over time; and
5. Complete all required CEQA review and prepare written findings supported by substantial evidence in the administrative record.

Pasadena's residents deserve a City government that respects and follows the protective laws it has enacted. The 44 mature trees on Sierra Madre Boulevard are valuable public assets that our ordinances were written to safeguard. I ask that you act promptly to uphold these standards and prioritize fiscal responsibility and environmental stewardship.

Thank you for your attention to this important matter.

Sincerely,

William Paparian
Former Mayor, City of Pasadena