November 12, 2026

City Council
City of Pomona
505 S. Garey Ave.
Pomona CA 91766

Re: Oak Tree Preservation Ordinance Update

Dear Honorable Mayor and City Councilmembers,

I'm writing on behalf of Clean & Green Pomona to ask that you direct staff to revise Section 1300.S of Pomona's Zoning and Development Code to strengthen protections for Oak trees in the City. Recent Major Oak Tree Permits in the city have highlighted the challenges with our existing discretionary law, in light of state legislation that erodes local oversight of development projects that harm our environment.

We argue that we need to revise our Oak Tree Preservation ordinance to objectively prioritize preservation of large trees and provide provisions which clarify the replacement quantities for removed trees that adequately compensate the community for lost benefits.

To this end, we have drafted an Oak Tree Preservation Ordinance for your consideration, which is attached. Drawing upon effective ordinances in other communities, it provides a number of clarifications and enhancements over the existing ordinance. Most importantly, it addresses the following:

1. **True protection of large oak trees**. Rather than relying on discretion of the Planning Commission which is legally challenging under recent State law, this ordinance specifically protects heritage oak trees (greater than 24" in diameter) from removal, with reasonable exemptions for protecting public health and safety, as well as diseased trees that threaten the oak tree population.
2. **Objective and defensible replacement standards for trees approved for removal**. Based on scientific forestry models that objectively calculate benefits and services of trees, the ordinance proposes a sliding scale of replacement standards for trees based on their size. These measure ensure that trees that are removed are replaced with a sufficient number of trees to compensate for lost benefits.
3. **Greater protection for smaller trees, including replacement trees**. The current ordinance protects oak trees greater than 8" in diameter, meaning that trees are often replaced by much

smaller trees that are not afforded protection, and could be removed without a permit. This ordinance addresses that gap by extending protection to all oak trees greater than 2” in diameter, consistent with other communities that have strong oak tree protections.

We ask that you direct staff to prioritize the revision of our Oak Tree Preservation Ordinance to be consistent with the key components of this draft ordinance. Clean & Green Pomona stands ready to respond to questions regarding our proposal, and offer our expertise in urban forestry as the City works to finalize an ordinance update.

Sincerely,



Kyle D. Brown, PhD
Clean & Green Pomona Board Member