

April 29, 2021

City of West Covina City Council  
1444 W. Garvey Ave.  
West Covina, CA 91790

**Subject: Walnut Grove Residential Project**

Dear West Covina City Council -

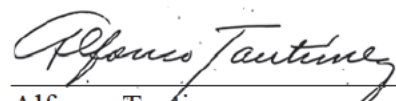
This letter is to provide the City of West Covina my support for the Walnut Grove project, which is located on Azusa Ave. and Rowland St.

As a resident of the City of West Covina since 1978 and being a full time Realtor/Manager for 30+ years, I feel that more housing is a critical component that the City needs to add, especially in this blighted location. With interest rates still at record lows combined with a low supply and extremely high demand, I am in strong support of this project. I've seen how the City has evolved and has become a retail hub in the San Gabriel Valley; it is important that we provide current and new residents with not only retail options, but as well new housing options. This project has a great mix of attached and detached homes that can help 1<sup>st</sup> time homebuyers, retirees, singles, and families that are upgrading.

I hope that the City Council moves forward with the project.

Thank you and if any questions don't hesitate to call me at [REDACTED]

Sincerely,



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Alfonso Tautimez

CA Department of Real Estate Lic [REDACTED]

## Mark Perez

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**From:** Anthony Kreeger [REDACTED]  
**Sent:** Tuesday, May 4, 2021 1:40 PM  
**To:** City Clerk  
**Subject:** Current Agenda City Council Meeting

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Hello,

I would like to express my opinion about the proposed Pioneer site located on Rowland Ave. I think this is a poorly planned project that is being pushed through at the expense of the local neighborhood. I am strongly opposed to this project.

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Regards,  
Anthony Kreeger  
[REDACTED]

**Mark Perez**

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**From:** Vicki Claudius [REDACTED]  
**Sent:** Tuesday, May 4, 2021 2:33 PM  
**To:** City Clerk  
**Subject:** Current Agenda for City Council meeting

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

To the Distinguished City Council Members,

My neighbors and I want to ask you not to accept the Walnut Grove Development Plan. We know units are going to be built. What we are asking for is a project that blends into the surrounding neighborhood. We do not want 158 units with many of them being 3 stories high.

Right now the zoning ordinance calls for 8 units per one acre. The developer wants the zoning ordinance changed to 20 units per acre. This is too many. This greatly impacts my neighbors and me - the people who have lived in this area for many years. We pay taxes, support the city, WE VOTE and contribute to the upkeep of our neighborhoods.

The Walnut Grove site on Rowland Ave. is not part of the 7 already identified sites that the city has reserved to provide a range of residential types, as stated in the Housing Element. This is known as the Downtown Plan. The Rowland site is part of an existing neighborhood that is WELL ESTABLISHED AS A SINGLE-FAMILY COMMUNITY. We find it interesting

that within each of the identified 7 sites listed and their descriptions, there is

a paragraph that reads “the redevelopment of this site is consistent with the city’s plans to focus higher intensity mixed uses with the downtown corridor, preserving the character of the surrounding suburban neighborhoods.” This is stated after each of the 7 descriptions. At some point the city cared about preserving neighborhoods.

Is this no longer true? These are not my words, they are the words found

in the West Covina General Plan. Has it come to the point where preserving neighborhoods is no longer important? I want to remind you

what is also stated in the beginning of the General Plan. “Our goal is to

direct new growth to the downtown area where development pressures are the greatest and change is desired, while protecting the

stable residential areas.”

Approving this development will COMPLETELY DISRUPT THE EXISTING

NEIGHBORHOOD by, at the very least, tripling the population, traffic

and adding new buildings with potential heights of 45 feet, thereby overtaxing, misusing and overbuilding a site that THE DEVELOPER

and (NOT THE CITY) identifies as underutilized.

To conclude our concerns – the developer’s specific plan states as an

objective – To complement the existing community character of the surrounding neighborhood. THIS CLEARLY is not true. The community members have told him this project in no way complements the existing character of our neighborhoods. WE

give up a lot and get NOTHING in return.

We APPEAL TO the City Council TO UPHOLD THE CITY OF  
WEST  
COVINA'S HOUSING ELEMENT AND GENERAL PLAN BY NOT  
ALLOWING THE CITY STANDARDS TO BE UNDERMINED BY  
THIS  
DEVELOPER .

Thank you,

Vicki Claudius

## Mark Perez

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**From:** Lydia Frey [REDACTED]  
**Sent:** Monday, May 3, 2021 9:16 AM  
**To:** City Clerk  
**Cc:** [REDACTED]  
**Subject:** Current agenda City Council meeting

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Hello,

My name is Lydia Frey and I live in district 2.

Thank you for the opportunity to submit my statements for the agenda item regarding the pioneer school.

My husband and my daughter have submitted statements regarding this development project on Rowland Ave at the Pioneer school.

Concerns of mine regarding this project include the following:

1. The traffic will be severely impacted, tripled or more. I keep hearing that Our neighbourhood is in a transit priority area, so traffic will not be affected, but that is not true. These houses will be priced between \$550k-\$1m, and those people will not ride the bus. Locally, the average annual income of bus riders is below \$15000, and those are not the people who will buy the homes at this project site, per L.A. Metro data. The project does not offer any low income housing.
2. Traffic Calming measures. People drive so fast here on Rowland and on the side streets around here. There's already been a death on my street. People come by to place flowers on the child's place of death Directly in front of my house on a weekly basis. I do not want to see more of this by adding so many more vehicles on this stretch of the road.
3. Too many units. This is just not right. It is not safe to give such little Outdoor green space to the residents here. To only give them 10,000 ft<sup>2</sup> and only one swing set and one bench, for what the city expects will be a population total of about 600 people for these 158 units is just wrong. There are many studies that prove this, and my daughter has sent them to you.
4. Setbacks. The setbacks of the condo units should match those on Rowland that these will be next to. They will be much closer to the street than my neighbors and I. I know that they need to have a certain amount of room for the roads inside of the complex, but just take those front units out. That's only taking out a handful of units, and giving them a better living environment and all of us a better, nicer, more uniform neighbourhood.

Thank you,  
Lydia

[Sent from Yahoo Mail on Android](#)

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**Kristine Frey**

West Covina, CA

April 29, 2021

**Jo-Anne Burns**

1444 W Garvey Ave S # 208

West Covina, CA 91790

Dear Ms. Burns,

Thank you for sending me the City's response to my inquiry regarding an EIR as it pertains to traffic.

This is my response to the contracted environmental consultant.

I still have some concerns regarding air quality, as well as some others.

SIP & Transportation Conformity

Below you will find two charts. As mentioned in my correspondence sent on April 26, quoting CEQA 2018: Title 14. Natural Resources Division 6. California Natural Resources Agency Chapter 3. Guidelines for the Implementation of the California Environmental Quality Act Article 1. General, § 15064 (h)(1). Determining the Significance of the Environmental Effects Caused by a Project, effects shall be considered when viewed in connection with the effects of other projects, including past and future probable projects:

(h)(1) When assessing whether a cumulative effect **requires an EIR**, the lead agency shall consider whether the cumulative impact is significant and whether the effects of the project are cumulatively considerable. An EIR must be prepared if the cumulative impact may be significant and the project's incremental effect, though individually limited, is cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, **and the effects of probable future projects.**

I include Table 4-6 from the draft initial study and the Transportation Conformity Budgets for the 2008 Ozone NAAQS in the South Coast, as West Covina is in the Los Angeles Basin/South Coast.

**TABLE 4-6  
PEAK DAILY OPERATIONAL EMISSIONS**

Source	Emissions (lbs/day)*					
	VOC	NOx	CO	SOx	PM10	PM2.5
Area sources	8	2	14	<1	<1	<1
Energy sources	<1	1	<1	<1	<1	<1
Mobile sources	2	8	28	<1	8	2
<b>Total Operational Emissions*</b>	<b>10</b>	<b>11</b>	<b>42</b>	<b>&lt;1</b>	<b>9</b>	<b>3</b>
<i>SCAQMD Significance Thresholds (Table 2)</i>	<i>55</i>	<i>55</i>	<i>550</i>	<i>150</i>	<i>150</i>	<i>55</i>
<b>Significant Impact?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

lbs/day: pounds per day; VOC: volatile organic compound; NOx: nitrogen oxides; CO: carbon monoxide; SOx: sulfur oxides; PM10: respirable particulate matter 10 microns or less in diameter; PM2.5: fine particulate matter 2.5 microns or less in diameter; SCAQMD: South Coast Air Quality Management District.

\* Some totals do not add due to rounding.

Source: SCAQMD 2019 (thresholds); see Appendix A, Air Quality and Greenhouse Gas Emissions Modeling Data, for CalEEMod model outputs.

The data provided in Table 4-6 shows that none of the analyzed criteria pollutants would exceed the regional emissions operational thresholds. Therefore, a less than significant regional air quality impact would occur from operation of the Project. No mitigation is required.

Transportation Conformity Budgets for  
the 2008 Ozone NAAQS in the South  
Coast  
[Summer planning inventory, tpd]

Budget year	VOC	NO <sub>x</sub>
2020	80	141
2023	68	89
2026	60	77
2029	54	69
2031	50	66

*Source: Table IX-3 of the 2018 SIP Update.*

Transportation conformity is required by the Clean Air Act section 176(c) (42 U.S.C. 7506(c)) to ensure that federal funding and approval are given to highway and transit projects that are consistent with ("conform to") the air quality goals established by a state air quality implementation plan (SIP). Conformity, to the purpose of the SIP, means that transportation activities will not cause new air quality violations, worsen



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existing violations, or delay timely attainment of the national ambient air quality standards. Thank you for the opportunity.<sup>1</sup>

This project, alone, has a VOC of 10. The  $\bar{x}$  of the VOC provided in Table IX – 3 of the 2018 SIP Update is 62.4, so this project alone constitutes 16.03%. Surely, when we combine recent past projects, these current projects, and probable future projects, we will surpass the VOC threshold for the SIP-South Coast transportation conformity.

Regarding NO<sub>x</sub>, this project has an NO<sub>x</sub> of 11. The  $\bar{x}$  of the NO<sub>x</sub> provided in Table IX – 3 of the 2018 SIP Update is 88.4, and this project alone constitutes 12.44%. Surely, when we combine recent past projects, the City's current projects, and probable future projects, we will surpass the NO<sub>x</sub> threshold for the SIP-South Coast transportation conformity.

With West Covina nearly bankrupt, I am baffled at why the City would risk transportation conformity as required by the Clean Air Act section 176(c) (42 U.S.C. 7506(c)), risking funding and approval to highway and transit projects that are consistent with ("conform to") the air quality goals established by a state air quality implementation plan (SIP). Again, per § 15064 (h)(1), "An EIR must be prepared if the cumulative impact may be significant and the project's incremental effect, though individually limited, is cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects."

Response to "Project is in a Transit Priority Area (TPA)"

This is true, of course. However, the residents of this area are of moderate income or above. The project (Walnut Grove proposed project at 1651 E Rowland Ave) provides no low income housing.

Has the City surveyed this area, or any areas of healthy economic means such as this one, to see whether or not residents here utilize local transit?

In "Findings on Transportation Research Reported by Investigators at University of Southern California (The Joint Effects of Income, Vehicle Technology, and Rail Transit Access On Greenhouse Gas Emissions)" Global Warming Focus, 2019-06-24, p.201<sup>2</sup>, the researchers' "paper examines the relationship between income, vehicle miles traveled (VMT), and greenhouse gas (GHG) emissions for households with varying access to rail transit". They found that "GHG emissions are lower near rail transit for virtually all income levels in this study implies environmental benefits from expanding rail transit systems".

The closest railway near this project site is 2.2 miles away, the Covina Metrolink Station. Driving, it is 2.2 miles away. To take the bus there, in this dedicated transit priority area, it will take one roughly 26 to 39 minutes. The shortest commute time via bus is as follows: One would need to walk 0.6 miles, about 12

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1

<https://www.federalregister.gov/documents/2019/10/01/2019-21325/approval-of-air-quality-implementation-plans-california-south-coast-air-basin-1-hour-and-8-hour>

<sup>2</sup> "Findings on Transportation Research Reported by Investigators at University of Southern California (The Joint Effects of Income, Vehicle Technology, and Rail Transit Access On Greenhouse Gas Emissions)." Global Warming Focus, NewsRX LLC, 2019, p. 201–.

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minutes to Badillo St and Azusa Ave, take the Foothill transit line 190 up to Citrus Ave and Badillo St, about 6 minutes commute time on the bus with 4 stops, and then walk 0.4 miles north, about 9 minutes to the Covina Station.

There is no bike lane on Rowland Avenue, nor is there one on SR-39. Additionally, with the steep grade percentage cross slope on Rowland Avenue, which should be a 1.5-2% per the AASHTO Green Book, which City Engineering has confirmed West Covina uses, is hardly safe to drive on, as cross slopes steeper than that can lead to vehicles potentially drifting, let alone safely ride our bikes on to get to the nearest rail station.

According to OurCountyLA Transportation Authority, “Additional investments are necessary, especially in order to protect cyclists and pedestrians from vehicle collisions. Since 2006, there has been an upward trend in cyclist injuries and fatalities in L.A. County, which has happened concurrently with increases in biking and bike commuting in the region. Areas with high truck traffic volumes can also pose a safety hazard for people who walk and bike, and may further deter the use of these modes due to noise, fumes and lack of a human scale. With worsening congestion, many trucks re-route through residential neighborhoods, causing nuisance issues as well as physical damage to roads and sidewalks.”<sup>3</sup> No improvements have been made on the surrounding roads near this project site in decades. This is the environment of the project site.

As mentioned, rail is used across income levels. However, busses are not.

No low income housing is being provided in this Walnut Grove project proposed site plan. This is not only unfair and prejudicial by the City to allow this project to move forward as planned, it goes directly against the function of neglecting air quality studies due to its existence in a TPA.

The riders of the local buways existing in this TPA corridor likely do not live here in this area, nor will they be residents of this proposed Walnut Grove project.

The State of California Department of Finance E-6. Population Estimates and Components of Change by County—July 1, 2010–2020 annual report published in December 2020, Los Angeles is one of just five counties in the state where the number of people moving out has eclipsed the number moving in for each of the past five years. According to transportation advocacy group Move LA, “core transit users, who tend to be low-income working families, comprise a significant share of the population near rail transit stations and bus corridors.”<sup>4</sup>

Housing costs are a likely contributor. Southern California Association of Governments (SCAG), a Joint Powers Authority under California state law, established as an association of local governments and agencies that voluntarily convene as a forum to address regional issues, according to SCAG’s census surveys, 37 percent of those leaving California indicated housing was the primary factor in their decision to leave—more than any other option given.

While this site is in a Transit Priority Area (TPA), the residents of this proposed Walnut Grove project will likely not use public access transit.

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<sup>3</sup> [https://ourcountyla.lacounty.gov/wp-content/uploads/2018/08/Our-County-Transportation-Briefing\\_For-Web.pdf](https://ourcountyla.lacounty.gov/wp-content/uploads/2018/08/Our-County-Transportation-Briefing_For-Web.pdf)

<sup>4</sup> [https://www.move-la.org/housing\\_transit](https://www.move-la.org/housing_transit)

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According to Metro [data](#)<sup>5</sup>, the median household income of bus riders is \$14,423, and for train riders, it's \$26,250 (2012 LA County US Census (ACS) 2006-2010).

Using this local data, provided by the expert authority of data collectors, statisticians and data analysts, the city cannot in good faith claim that this project that completely neglects housing for low income residents and provides no housing for low income residents, nor others neglecting housing for low income residents, should be exempt from providing an EIR. Due to this disagreement among expert opinion supported by facts, the Lead Agency shall treat the effect as significant and shall prepare an EIR, per § 15064 (g):

§ 15064. Determining the Significance of the Environmental Effects Caused by a Project

(g) After application of the principles set forth above in Section 15064(f), and in marginal cases where it is not clear whether there is substantial evidence that a project may have a significant effect on the environment, the lead agency shall be guided by the following principle: If there is disagreement among expert opinion supported by facts over the significance of an effect on the environment, the Lead Agency shall treat the effect as significant and shall prepare an EIR.

Lack of Greenspace

This project should, additionally, provide more greenspace for the residents. Insufficient access to greenspace is detrimental to the neural function of spatial working memory, climate change, and so much more. See the following studies:

- The role of neighbourhood greenspace in children's spatial working memory Eirini Flouri\* , Efstathios Papachristou and Emily Midouhas Department of Psychology and Human Development, UCL Institute of Education, University College London, UK
- The Heterogeneity of Air Temperature in Urban Residential Neighborhoods and Its Relationship with the Surrounding Greenspace by Yuguo Qian Weiqi Zhou\*, Xiaofang Hu and Fan Fu
- Thanh Hoan, Nguyen, et al. "Assessing the Effects of Land-Use Types in Surface Urban Heat Islands for Developing Comfortable Living in Hanoi City." Remote Sensing (Basel, Switzerland), vol. 10, no. 12, MDPI AG, 2018, p. 1965–, doi:10.3390/rs10121965.
  - "The function of the vegetation to lower the LST in a hot environment is evident. The results of this study suggest that the newly developed model provides an opportunity for urban planners and designers to develop measures for adjusting the [land surface temperature] LST, and for mitigating the consequent effects of [Urban Heat Islands] UHIs by managing the land use composition and percentage coverage of the individual land-use type."

This site plan has been approved for a specific land use type allowing for 20 units per acre, outside of the scope of West Covina municipality R-1 zoning (8 units per acre), which limits this area to a 30% land cover. However, this site covers more than 30%, a number which has not been provided to the public in an ID/MND nor in an EIR.

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<sup>5</sup>[https://media.metro.net/projects\\_studies/research/images/infographics/metro\\_infographic\\_02.pdf](https://media.metro.net/projects_studies/research/images/infographics/metro_infographic_02.pdf)  
[http://media.metro.net/projects\\_studies/research/images/annual\\_survey\\_results/bus\\_results\\_fall\\_2018.pdf](http://media.metro.net/projects_studies/research/images/annual_survey_results/bus_results_fall_2018.pdf)

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While the air quality does not surpass thresholds mentioned in the IS/MND, the limited access to sufficient greenspace, and the impact of this site's projected plans, the City's past projects, and future probable projects, and, for this site specifically packing 158 units into the project site, with blacktop roads and dark shingle roofs will, in fact, have an impact on heat island effect in conjunction with past projects, current projects, and probable future projects, thus this *does* constitute further investigation and an EIR. And, again, disagreement among expert opinion *is* supported by facts, thus, the Lead Agency shall treat the effect as significant and shall prepare an EIR, per § 15064 (g), and past, present, and future projects must be considered per § 15064 (h)(1).

Unprecedentedly, the City of West Covina has chosen to create its own Health Department. The effects on air quality by proposed projects should be considered with earnest intent to meet the needs of its citizens, providing them with good air quality, should this experiment with public health services go awry as we make our way through recovery from the COVID-19 pandemic that primarily affects lung function.

There are so many reasons why an environmental impact report is needed.

I look forward to your response.

Thank you,

Kristine Frey

## Mark Perez

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**From:** Jo-Anne Burns  
**Sent:** Monday, May 3, 2021 9:55 AM  
**To:** Lisa Sherrick; Mark Perez  
**Subject:** FW: PIONEER HOUSING PROJECT

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**From:** Amelia Iniguez [REDACTED]  
**Sent:** Saturday, May 1, 2021 9:13 PM  
**To:** Jo-Anne Burns <JBurns@westcovina.org>  
**Subject:** PIONEER HOUSING PROJECT

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Ms. Burns,

This is in regards to the notice of public hearing received relative to the 1651 E Rowland Ave project, and to reiterate my concern and the concerns of the residents being impacted by this proposed project. I sincerely hope the Planning Commission will take this into consideration.

- 158 units in a proposed 9.14-acre are extreme. This will create a substantial traffic increase, the units built near the adjacent homes will be impacted by privacy issues and noise. Property value may be impacted due to the closeness of the units. The Planning Commission should consider the applicant consider building fewer units.
- Stipulate the units will not be rental units. We have notice Airbnb homes with tenants who could care less about the neighborhood and/or property. These units could subsequently rent out and again having renters who come and go.
- Reconsider the emergency exit on Eileen St. for emergency vehicles. It would create disturbing an established neighborhood where children live, play, and residents who walk on the streets as we have no sidewalks. This proposed plan is unacceptable!

Again, I truly hope the Planning Commission will take into consideration these concerns as well as the concerns and comments expressed by other residents.

Regards.

Amelia Iniguez

[REDACTED]

## Mark Perez

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**From:** Jo-Anne Burns  
**Sent:** Tuesday, May 4, 2021 7:57 AM  
**To:** Lisa Sherrick; Mark Perez  
**Subject:** FW: Pioneer site -- EIR? Council Meeting Date?  
**Attachments:** LA\_GreenRoofsResourceGuide.pdf

Hello Lisa and Mark,

This email is in regards to Agenda Item No. 13. Please share with the City Council for their consideration. Thank you.

Sincerely,

**Jo-Anne Burns | Planning Manager**

City of West Covina | Planning Division

Phone: (626) 939-8422 | Direct: (626) 939-8761

[jburns@westcovina.org](mailto:jburns@westcovina.org)

**City Hall Business Hours:**

Monday-Thursday 7:30 AM-5:30 PM



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**From:** Kristine Frey [REDACTED]  
**Sent:** Friday, April 30, 2021 8:48 AM  
**To:** Jo-Anne Burns <JBurns@westcovina.org>  
**Subject:** Re: Pioneer site -- EIR? Council Meeting Date?

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Good morning, Jo-Anne,

I hope this message finds you well.

Please include the following attachment and quote to my letter/statements which gives source for my statements regarding this project's impact, past projects, other present projects, and probable future projects, in contributing to urban heat island effect and its links to blacktop roads (replacing vegetative ground cover, in this case, roughly five acres) and dark shingle roof statements.

"Over the past 70 years, as the City of Los Angeles has grown, temperatures in the city have increased. It has been reported that the high temperature in Los Angeles has shown a steady increase from 97 degrees Fahrenheit (36 C) in 1937 to 105°F (40 C) in the 1990s (HIG, 2000). This trend of increasing temperatures with increasing urbanization is commonly referred to as the Urban Heat Island (UHI) effect. Scientists believe that a significant cause of this effect is the replacement of areas covered by vegetation with dark colored building materials such as those commonly used on roads and roofs."

"Elevated temperatures contribute to poor air quality. A study by Lawrence Berkeley National Laboratory's Heat Island Group found that increasing the reflectivity of manmade surfaces and adding vegetation over just 15 percent of the convertible area in the Los Angeles Basin would reduce summer temperatures by 6 degrees Fahrenheit (3 C). This group further estimated that, due to the dependence of smog formation on temperature, ozone (the chief component of smog) would be reduced by about 10% (HIG, 2000). Temperature reductions have the added benefit of decreasing energy demand, as less energy is needed for air conditioning. This leads to further improvements in air quality by reducing the burning of fossil fuels at power plants and thus lowering emissions.<sup>1</sup> A study conducted for the City of Chicago found that greening all the City's rooftops would cut peak energy demand by 720 Megawatts (Velasquez, 2004). The Heat Island Group estimates that the 5 to 9 degree (3 to 5 C) possible reduction of the Urban Heat Island would save Los Angeles ½ to 1 Gigawatt in peak power (HIG, 2000)."

- Green Roofs - Cooling Los Angeles A Resource Guide (2006)

In neither this plan for Pioneer School, nor others, are anything other than dark roofs proposed/have been approved recently in West Covina, to my knowledge. This is a major contributor to UHIs, and when you combine past/present and future probable projects, that should be considered in respect to air quality, and an EIR is required, per CEQA 2018: Title 14. Natural Resources Division 6. California Natural Resources Agency Chapter 3. Guidelines for the Implementation of the California Environmental Quality Act Article 1. General, § 15064 (h)(1).

Thank you.

Kristine

On Thu, Apr 29, 2021, 5:20 PM Kristine Frey [REDACTED] wrote:

Hi Jo-Anne,

Thank you for your response. Attached is my response to the consultant. Additionally, I could not locate my comments with the environmental consultant's response in neither the "response to comments" pdf nor the "2nd response to comments pdf".

The text of that letter is below, as well.

Regards,  
Kristine

Dear Ms. Burns,

Thank you for sending me the City's response to my inquiry regarding an EIR as it pertains to traffic.

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I still have some concerns regarding air quality, as well as some others.

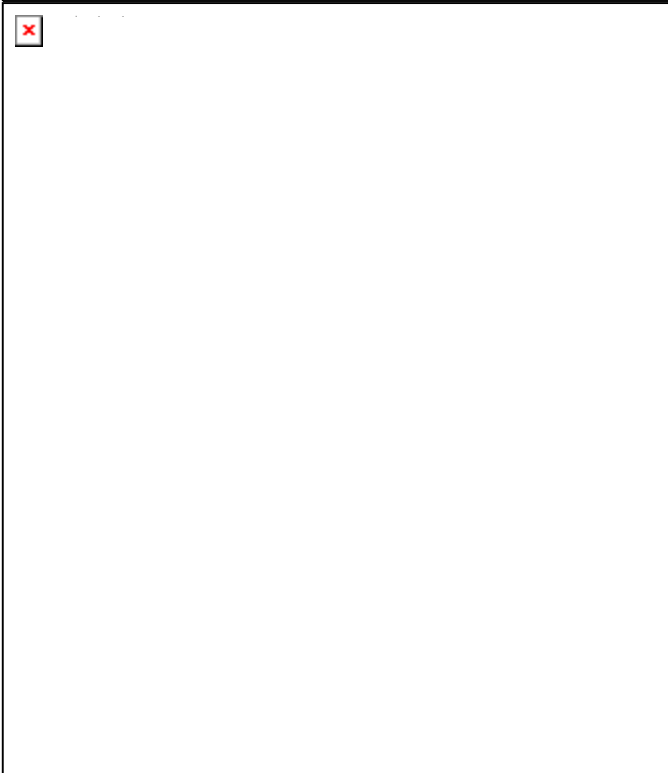
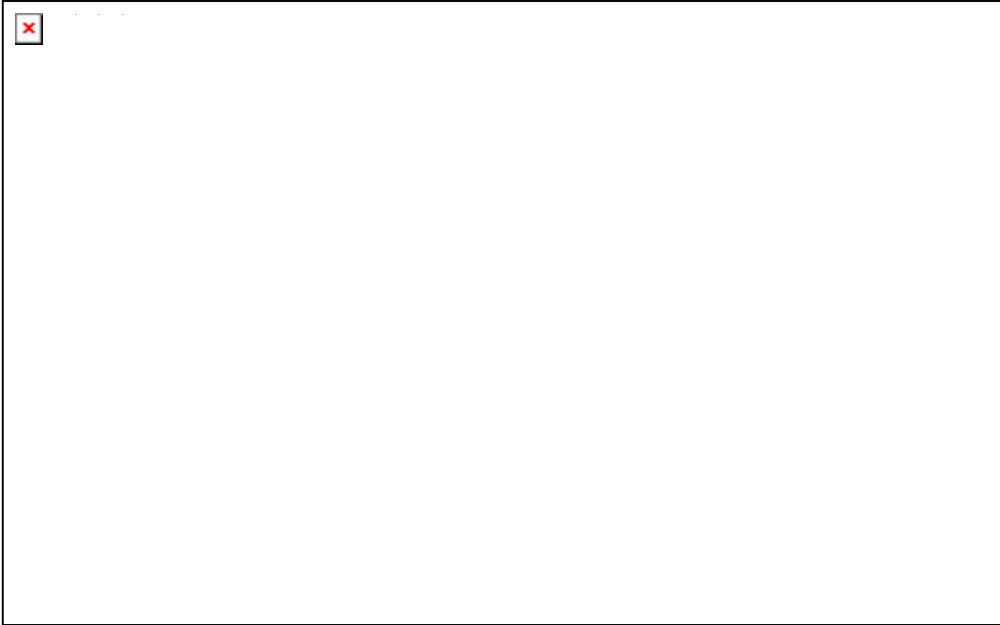
SIP & Transportation Conformity

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the SIP, means that transportation activities will not cause new air quality violations, worsen existing violations, or delay timely attainment of the national ambient air quality standards. Thank you for the opportunity.

This project, alone, has a VOC of 10. The  $\bar{x}$  of the VOC provided in Table IX – 3 of the 2018 SIP Update is 62.4, so this project alone constitutes 16.03%. Surely, when we combine recent past projects, these current projects, and probable future projects, we will surpass the VOC threshold for the SIP-South Coast transportation conformity.

Regarding NOx, this project has an NOx of 11. The  $\bar{x}$  of the NOx provided in Table IX – 3 of the 2018 SIP Update is 88.4, and this project alone constitutes 12.44%. Surely, when we combine recent past projects, the City's current projects, and probable future projects, we will surpass the NOx threshold for the SIP-South Coast transportation conformity.

With West Covina nearly bankrupt, I am baffled at why the City would risk transportation conformity as required by the Clean Air Act section 176(c) (42 U.S.C. 7506(c)), risking funding and approval to highway and transit projects that are consistent with ("conform to") the air quality goals established by a state air quality implementation plan (SIP). Again, per § 15064 (h)(1), "An EIR must be prepared if the cumulative impact may be significant and the project's incremental effect, though individually limited, is cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects."

Response to "Project is in a Transit Priority Area (TPA)"

This is true, of course. However, the residents of this area are of moderate income or above. The project (Walnut Grove proposed project at 1651 E Rowland Ave) provides no low income housing.

Has the City surveyed this area, or any areas of healthy economic means such as this one, to see whether or not residents here utilize local transit?

In "Findings on Transportation Research Reported by Investigators at University of Southern California (The Joint Effects of Income, Vehicle Technology, and Rail Transit Access On Greenhouse Gas Emissions)" Global Warming Focus, 2019-06-24, p.201, the researchers' "paper examines the relationship between income, vehicle miles traveled (VMT), and greenhouse gas (GHG) emissions for households with varying access to rail transit". They found that "GHG emissions are lower near rail transit for virtually all income levels in this study implies environmental benefits from expanding rail transit systems".

The closest railway near this project site is 2.2 miles away, the Covina Metrolink Station. Driving, it is 2.2 miles away. To take the bus there, in this dedicated transit priority area, it will take one roughly 26 to 39 minutes. The shortest commute time via bus is as follows: One would need to walk 0.6 miles, about 12 minutes to Badillo St and Azusa Ave, take the Foothill transit line 190 up to Citrus Ave and Badillo St, about 6 minutes commute time on the bus with 4 stops, and then walk 0.4 miles north, about 9 minutes to the Covina Station.

There is no bike lane on Rowland Avenue, nor is there one on SR-39. Additionally, with the steep grade percentage cross slope on Rowland Avenue, which should be a 1.5-2% per the AASHTO Green Book, which City Engineering has confirmed West Covina uses, is hardly safe to drive on, as cross slopes steeper than that can lead to vehicles potentially drifting, let alone safely ride our bikes on to get to the nearest rail station.

According to OurCountyLA Transportation Authority, "Additional investments are necessary, especially in order to protect cyclists and pedestrians from vehicle collisions. Since 2006, there has been an upward trend in cyclist injuries and fatalities in L.A. County, which has happened concurrently with increases in biking and bike commuting in the region. Areas with high truck traffic volumes can also pose a safety hazard for people who walk and bike, and may further deter the use of these modes due to noise, fumes and lack of a human scale. With worsening congestion, many trucks re-route through residential neighborhoods, causing nuisance issues as well as physical damage to roads and sidewalks." No improvements have been made on the surrounding roads near this project site in decades. This is the environment of the project site.

As mentioned, rail is used across income levels. However, busses are not.

No low income housing is being provided in this Walnut Grove project proposed site plan. This is not only unfair and prejudicial by the City to allow this project to move forward as planned, it goes directly against the function of neglecting air quality studies due to its existence in a TPA.

The riders of the local buways existing in this TPA corridor likely do not live here in this area, nor will they be residents of this proposed Walnut Grove project.

The State of California Department of Finance E-6. Population Estimates and Components of Change by County—July 1, 2010–2020 annual report published in December 2020, Los Angeles is one of just five counties in the state where the number of people moving out has eclipsed the number moving in for each of the past five years. According to transportation advocacy group Move LA, “core transit users, who tend to be low-income working families, comprise a significant share of the population near rail transit stations and bus corridors.”

Housing costs are a likely contributor. Southern California Association of Governments (SCAG), a Joint Powers Authority under California state law, established as an association of local governments and agencies that voluntarily convene as a forum to address regional issues, according to SCAG’s census surveys, 37 percent of those leaving California indicated housing was the primary factor in their decision to leave—more than any other option given.

While this site is in a Transit Priority Area (TPA), the residents of this proposed Walnut Grove project will likely not use public access transit.

According to Metro [data](#), the median household income of bus riders is \$14,423, and for train riders, it’s \$26,250 (2012 LA County US Census (ACS) 2006-2010).

Using this local data, provided by the expert authority of data collectors, statisticians and data analysts, the city cannot in good faith claim that this project that completely neglects housing for low income residents and provides no housing for low income residents, nor others neglecting housing for low income residents, should be exempt from providing an EIR. Due to this disagreement among expert opinion supported by facts, the Lead Agency shall treat the effect as significant and shall prepare an EIR, per § 15064 (g):

#### § 15064. Determining the Significance of the Environmental Effects Caused by a Project

(g) After application of the principles set forth above in Section 15064(f), and in marginal cases where it is not clear whether there is substantial evidence that a project may have a significant effect on the environment, the lead agency shall be guided by the following principle: If there is disagreement among expert opinion supported by facts over the significance of an effect on the environment, the Lead Agency shall treat the effect as significant and shall prepare an EIR.

#### Lack of Greenspace

This project should, additionally, provide more greenspace for the residents. Insufficient access to greenspace is detrimental to the neural function of spatial working memory, climate change, and so much more. See the following studies:

- The role of neighbourhood greenspace in children’s spatial working memory Eirini Flouri\*, Efstathios Papachristou and Emily Midouhas Department of Psychology and Human Development, UCL Institute of Education, University College London, UK
- The Heterogeneity of Air Temperature in Urban Residential Neighborhoods and Its Relationship with the Surrounding Greenspace by Yuguo Qian Weiqi Zhou\*, Xiaofang Hu and Fan Fu
- Thanh Hoan, Nguyen, et al. “Assessing the Effects of Land-Use Types in Surface Urban Heat Islands for Developing Comfortable Living in Hanoi City.” Remote Sensing (Basel, Switzerland), vol. 10, no. 12, MDPI AG, 2018, p. 1965–, doi:10.3390/rs10121965.
  - “The function of the vegetation to lower the LST in a hot environment is evident. The results of this study suggest that the newly developed model provides an opportunity for urban planners

and designers to develop measures for adjusting the [land surface temperature] LST, and for mitigating the consequent effects of [Urban Heat Islands] UHIs by managing the land use composition and percentage coverage of the individual land-use type.”

This site plan has been approved for a specific land use type allowing for 20 units per acre, outside of the scope of West Covina municipality R-1 zoning (8 units per acre), which limits this area to a 30% land cover. However, this site covers more than 30%, a number which has not been provided to the public in an ID/MND nor in an EIR.

While the air quality does not surpass thresholds mentioned in the IS/MND, the limited access to sufficient greenspace, and the impact of this site’s projected plans, the City’s past projects, and future probable projects, and, for this site specifically packing 158 units into the project site, with blacktop roads and dark shingle roofs will, in fact, have an impact on heat island effect in conjunction with past projects, current projects, and probable future projects, thus this *does* constitute further investigation and an EIR. And, again, disagreement among expert opinion *is* supported by facts, thus, the Lead Agency shall treat the effect as significant and shall prepare an EIR, per § 15064 (g), and past, present, and future projects must be considered per § 15064 (h)(1).

Unprecedentedly, the City of West Covina has chosen to create its own Health Department. The effects on air quality by proposed projects should be considered with earnest intent to meet the needs of its citizens, providing them with good air quality, should this experiment with public health services go awry as we make our way through recovery from the COVID-19 pandemic that primarily affects lung function.

There are so many reasons why an environmental impact report is needed.

I look forward to your response.

Thank you,

Kristine Frey

**Kristine Frey**

she/her/hers

c/

On Thu, Apr 29, 2021 at 1:11 PM Jo-Anne Burns <[JBurns@westcovina.org](mailto:JBurns@westcovina.org)> wrote:

Hello Kristine,

Our City Attorney’s Office advised that I have our Environmental consultant respond to your initial email. I have attached the response, which was also made a part of the “Responses to Comments” in the City Council packet for the record.

Sincerely,

**Jo-Anne Burns | Planning Manager**

City of West Covina | Planning Division

Phone: (626) 939-8422 | Direct: (626) 939-8761

[jburns@westcovina.org](mailto:jburns@westcovina.org)

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**From:** Kristine Frey [REDACTED]  
**Sent:** Monday, April 26, 2021 12:29 PM  
**To:** Jo-Anne Burns <[JBurns@westcovina.org](mailto:JBurns@westcovina.org)>  
**Subject:** Re: Pioneer site -- EIR? Council Meeting Date?

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Thank you, Jo-Anne.

This should not go to City Council, see the highlighted portion of CEQA title 14, division 6, chapter 3, Article 1, § 15004 (2) (A).

Feel free to also send the following selected text from CEQA 2018:

Title 14. Natural Resources

Division 6. California Natural Resources Agency

Chapter 3. Guidelines for the Implementation of the California Environmental Quality Act

Article 1. General

§ 15004. Time of Preparation.

(a) Before granting any approval of a project subject to CEQA, every lead agency or responsible agency shall consider a final EIR or negative declaration or another document authorized by these guidelines to be used in the place of an EIR or negative declaration. See the definition of "approval" in Section 15352.

(2) To implement the above principles, public agencies shall not undertake actions concerning the proposed public project that would have a significant adverse effect or limit the choice of alternatives or mitigation measures, before completion of CEQA compliance. For example, agencies shall not:

(A) Formally make a decision to proceed with the use of a site for facilities which would require CEQA review, regardless of whether the agency has made any final purchase of the site for these facilities, except that agencies may designate a preferred site for CEQA review and may enter into land acquisition

agreements when the agency has conditioned the agency's future use of the site on CEQA compliance.

#### § 15063. Initial Study.

(a) (1) All phases of project planning, implementation, and operation must be considered in the initial study of the project.

#### § 15064. Determining the Significance of the Environmental Effects Caused by a Project.

(4) The lead agency may use any of the arrangements or combination of arrangements described in

(b) Results.

(1) If the agency determines that there is substantial evidence that any aspect of the project, either individually or cumulatively, may cause a significant effect on the environment, regardless of whether the overall effect of the project is adverse or beneficial, the lead agency shall do one of the following:

(A) Prepare an EIR or

(B) Use a previously prepared EIR which the lead agency determines would adequately analyze the project at hand, or

(C) Determine, pursuant to a program EIR, tiering, or another appropriate process, which of a project's effects were adequately examined by an earlier EIR or negative declaration. Another appropriate process may include, for example, a master EIR, a master environmental assessment, approval of

housing and neighborhood commercial facilities in urban areas, approval of residential projects pursuant to a specific plan as described in section 15182, approval of residential projects consistent with a community plan, general plan or zoning as described in section 15183, or an environmental document

prepared under a State certified regulatory program. The lead agency shall then ascertain which effects, if any, should be analyzed in a later EIR or negative declaration.

(2) The lead agency shall prepare a negative declaration if there is no substantial evidence that the project or any of its aspects may cause a significant effect on the environment.

#### § 15064. Determining the Significance of the Environmental Effects Caused by a Project.

(f) The decision as to whether a project may have one or more significant effects shall be based on substantial evidence in the record of the lead agency.

(1) If the lead agency determines there is substantial evidence in the record that the project may have a significant effect on the environment, the lead agency shall prepare an EIR (*Friends of B Street v. City of Hayward* (1980) 106 Cal. App. 3d 988). Said another way, if a lead agency is presented with a fair argument that a project may have a significant effect on the environment, the lead agency shall prepare an EIR even though it may also be presented with other substantial evidence that the project will not have a significant effect (*No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal. 3d 68).

(7) The provisions of sections 15162, 15163, and 15164 apply when the project being analyzed is a change to, or further approval for, a project for which an EIR or negative declaration was previously certified or adopted (e.g. a tentative subdivision, conditional use permit). Under case law, the fair argument standard does not apply to determinations of significance pursuant to sections 15162, 15163, and 15164.

(g) After application of the principles set forth above in Section 15064(f), and in marginal cases where it is not clear whether there is substantial evidence that a project may have a significant effect on the environment, the lead agency shall be guided by the following principle: If there is disagreement among

expert opinion supported by facts over the significance of an effect on the environment, the Lead Agency shall treat the effect as significant and shall prepare an EIR.

(h)(1) When assessing whether a cumulative effect requires an EIR, the lead agency shall consider whether the cumulative impact is significant and whether the effects of the project are cumulatively considerable. An EIR must be prepared if the cumulative impact may be significant and the project's incremental effect, though individually limited, is cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.

#### § 15064.4. Determining the Significance of Impacts from Greenhouse Gas Emissions.

(b) In determining the significance of a project's greenhouse gas emissions, the lead agency should focus its analysis on the reasonably foreseeable incremental contribution of the project's emissions to the effects of climate change. A project's incremental contribution may be cumulatively considerable even if it appears relatively small compared to statewide, national or global emissions. The agency's analysis should consider a timeframe that is appropriate for the project. The agency's analysis also must reasonably reflect evolving scientific knowledge and state regulatory schemes. A lead agency should consider the following factors, among others, when assessing determining the significance of impacts from greenhouse gas emissions on the environment:

- (1) The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting;
- (2) Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.
- (3) The extent to which the project complies with regulations or requirements adopted to implement



a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions (see, e.g., section 15183.5(b)). Such requirements must be adopted by the relevant public agency through a public review process and must reduce or mitigate the project's incremental contribution of greenhouse gas emissions. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding compliance with the adopted regulations or requirements, an EIR must be prepared for the project. In determining the significance of impacts, the lead agency may consider a project's consistency with the State's long-term climate goals or strategies, provided that substantial evidence supports the agency's analysis of how those goals or strategies address the project's incremental contribution to climate change and its conclusion that the project's incremental contribution is not cumulatively considerable.

**AUTHORITY:**

Note: Authority cited: Sections 21083 and 21083.05, Public Resources Code. Reference: Sections 21001, 21002, 21003, 21065, 21068, 21080, 21082, 21082.1, 21082.2, 21083.05 and 21100, Public Resources Code; Cleveland National Forest Foundation v. San Diego Assn. of Governments (2017) 3 Cal.5th 497; Mission Bay Alliance v. Office of Community Investment & Infrastructure (2016) 6 Cal.App.5th 160; Center for Biological Diversity v. Dept. of Fish & Wildlife (2015) 62 Cal.4th 204; Communities for a Better Environment v. City of Richmond (2010) 184 Cal.App.4th 70; Eureka Citizens for Responsible Govt. v. City of Eureka (2007) 147 Cal.App.4th 357; Mejia v. City of Los Angeles (2005) 130 Cal.App.4th 322; Protect the Historic Amador Waterways v. Amador Water Agency (2004) 116 Cal.App.4th 1099; Communities for a Better Environment v. California Resources Agency (2002) 103 Cal.App.4th 98; Berkeley Keep Jets Over the Bay Com. v. Board of Port Comm. (2001) 91 Cal.App.4th 1344; and City of Irvine v. Irvine Citizens Against Overdevelopment (1994) 25 Cal.App.4th 868.

On Mon, Apr 26, 2021, 11:06 AM Jo-Anne Burns <[JBurns@westcovina.org](mailto:JBurns@westcovina.org)> wrote:

Hello Kristine,

I forwarded your email to our City Attorney's office and Environmental Consultants for direction. The May 4<sup>th</sup> City Council public hearing has been advertised and will take place. Are you planning on writing a separate email addressed to the City Council pertaining to the issue?

Sincerely,

**Jo-Anne Burns | Planning Manager**

City of West Covina | Planning Division

Phone: (626) 939-8422 | Direct: (626) 939-8761

[jburns@westcovina.org](mailto:jburns@westcovina.org)

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**From:** Kristine Frey [REDACTED]  
**Sent:** Monday, April 26, 2021 10:38 AM  
**To:** Jo-Anne Burns <[JBurns@westcovina.org](mailto:JBurns@westcovina.org)>  
**Subject:** Re: Pioneer site -- EIR? Council Meeting Date?

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Thank you for this information, Jo-Anne.

I would like to request an EIR, per CEQA, SB 743, New Section 15064.3, and to review that data prior to approval of the lead agency (West Covina City).

Working with the Traffic Division, I have requested traffic data analysis. On Rowland a few weeks ago, they put out traffic speed recorders. I also requested a traffic study on Leaf and Rowland. This is data that qualifies for our review per SB 743, New Section 15064.3. Determining the Significance of Transportation Impacts, (b) (3) "Qualitative Analysis. If existing models or methods are not available to estimate the vehicle miles traveled for the particular project being considered, a lead agency may analyze the project's vehicle

miles traveled qualitatively. Such a qualitative analysis would evaluate factors such as the availability of transit, proximity to other destinations, etc. For many projects, a qualitative analysis of construction traffic may be appropriate."

We should have the opportunity to review the data in an EIR, per CEQA, especially given that the IS/MND posted said the main culprit on air quality will be by cars on the road having an impact on air quality. I'm sure it's not just speed they tracked, but a traffic count, as well, giving us an idea of impact on air quality.

I look forward to your response. Thank you.

Kristinev

On Thu, Apr 22, 2021, 11:17 AM Jo-Anne Burns <[JBurns@westcovina.org](mailto:JBurns@westcovina.org)> wrote:

Hello Kristine,

The CEQA document/process is the IS/MND posted on the website. It is not an EIR. The Pioneer site on Rowland is scheduled for City Council review on May 4, 2021. The hearing notice is published on the website, will be published in SGV Tribune tomorrow, and was sent out today to all property owners and neighbors within 300 feet from the site.

Unfortunately, the public hearing notice is not required to be posted on the site for the City Council Meeting. The site posting is a Planning Commission adopted policy and is not required by the West Covina Municipal Code.

We have posted the revised plans and draft specific plan on the City's website (link below). The specific plan and plans were revised based on the Planning Commission's approved recommendations.

<https://www.westcovina.org/departments/community-development/planning-division/projects-and-environmental-documents>

Sincerely,

**Jo-Anne Burns | Planning Manager**

City of West Covina | Planning Division

Phone: (626) 939-8422 | Direct: (626) 939-8761

[jburns@westcovina.org](mailto:jburns@westcovina.org)

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**From:** Kristine Frey [REDACTED]  
**Sent:** Thursday, April 22, 2021 11:04 AM  
**To:** Jo-Anne Burns <[JBurns@westcovina.org](mailto:JBurns@westcovina.org)>  
**Subject:** Pioneer site -- EIR? Council Meeting Date?

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Hi Joanne,

Just a quick email to see if there will be an environmental impact report for the Pioneer site on Rowland Avenue, and to ask when City Council will hold their meeting regarding this site and the associated development.

Please let me know at your convenience.

Thanks!

**Kristine Frey**

she/her/hers



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# **Green Roofs - Cooling Los Angeles**

*A Resource Guide*



Environmental Affairs Department  
City of Los Angeles  
200 N. Spring Street., Suite 2005  
Los Angeles, CA 90012

2006

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## **Environmental Affairs Department**

The City of Los Angeles Environmental Affairs Department (EAD), established in 1990, is the chief advisor to the City on environmental matters. It proactively brings together people and resources to educate and develop ways to improve the Los Angeles environment. By restoring habitats, creating innovative alternatives, assisting businesses and revitalizing communities, EAD makes LA a better place to live.

Information Hotline: (213) 978-0888

Web site: <http://www.lacity.org/EAD>

E-mail: [eadinfo@lacity.org](mailto:eadinfo@lacity.org)

Mail: City of Los Angeles  
Environmental Affairs Department  
200 N. Spring St., Room 2005  
Los Angeles, CA 90012

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## PREFACE

This resource guide has been prepared in partial response to Los Angeles City Council motion CF#04-0074, *Incorporate Rooftop Green Spaces as an Energy Efficiency Mechanism*. This motion directed the Environmental Affairs Department (EAD) to lead the formation of a City task force for the purpose of developing and implementing "...a process, program, or procedure that will require City facilities to incorporate rooftop green spaces as an energy efficiency mechanism..." To support the Green Roof Task Force, the EAD researched green roof options and assembled information on numerous case studies and guideline development efforts in North America, Europe, and Japan. EAD subsequently utilized consultant assistance to expand and summarize the available research, determine its applicability to potential projects in the Los Angeles area, and incorporate practical and procedural information from the Task Force members into a plan for the development of green roofs in the City of Los Angeles. This document is intended to serve as a reference guide to facilitate green roof development by the City as well as other public entities and private building owners within Los Angeles.

## DISCLAIMER

This Resource Guide is intended as an introduction to green roofs. Any information contained here is general in nature and is not intended to take the place of professional assistance. This Guide is not intended as an endorsement by the City of Los Angeles of any specific green roof design, construction or maintenance techniques or entities. The City of Los Angeles assumes no liability for the use of information included in this Resource Guide.

## I. Introduction

### WHAT IS A GREEN ROOF?

We use the term “green roof” to refer to a permanent roof-top planting system that allows for the sustained presence of live plants covering a significant portion of a building’s roof. As described in more detail later in this report, green roofs can provide a range of environmental, economic, and social benefits. Green roofs have been widely adopted for many years in some countries (most notably Germany) but are a relatively new concept in the United States. Green roofs fall into one of two primary types: intensive and extensive. **Intensive roofs** are essentially conventional gardens that happen to be located on the roof of a building. They may include moderate sized trees, shrubs, ornamentals and even crops planted in at least 12 inches (30 cm) of soil and are designed for traditional garden uses including recreation, relaxation and food production. Intensive green roofs add a considerable weight load (typically from 80 to 150 lb/ft<sup>2</sup> or 391 to 732 kg/m<sup>2</sup>) to a structure and usually require intensive maintenance. As such, they are designed to be routinely accessible in keeping with their intended use (Scholz-Barth, 2001) and may only cover a small fraction of the roof surface. **Extensive green roofs**, on the other hand, are not meant to be accessible except for occasional maintenance. Extensive green roofs consist of a blanket of low vegetation planted in just a few inches of a specialized, lightweight growing medium that covers a considerable portion of a roof. Extensive green roofs are primarily designed to achieve an array of environmental benefits as discussed below. While many of the benefits of extensive green roofs apply to intensive green roofs as well, extensive roofs are strictly designed with these benefits in mind, while intensive roofs are generally built for other reasons.

### WHAT ARE THE BENEFITS OF A GREEN ROOF?

Green roofs provide a host of potential benefits to building owners and the surrounding community. During warm weather, green roofs are cooler than conventional roof surfaces, thus helping to reduce energy consumption for air conditioning and mitigating the urban heat island effect which produces higher temperatures in core urban areas (where most surfaces are covered by concrete and pavement) than in surrounding, less developed areas. Like other forms of vegetation, green roofs also help filter pollutants such as fine particulate matter and toxic gases from the air and their cooling effect can help reduce ozone pollution (smog). Green roofs also help prevent water pollution by filtering polluted runoff and greatly reducing the total amount of runoff that reaches the storm sewer system. Other benefits of green roofs include:

- Increased thermal insulation of the roof, thus promoting further energy savings for heating and cooling.
- Green roofs shield the water-proof roofing membrane from the elements, thus greatly extending membrane life and generating potential savings on reroofing costs.

- Increased sound absorption resulting in less reflection of noise into the surrounding area and less penetration of noise into the building.
- Creation of additional natural habitat for birds and insects in urban areas. Some green roofs may also be suitable for helping threatened indigenous species.
- Intensive green roofs offer potential for organic food production and provide a social gathering place.
- Aesthetic benefits of adding additional “green” area in an urban environment.
- Accessible green roofs (generally only of the *intensive* variety) can provide recreational benefits and amenity space without using up valuable property space.

In recognition of these many valuable benefits of green roofs, some cities in the U.S. have developed incentive programs to promote both the retrofitting of green roofs on existing buildings and the use of green roof designs for new construction. Most common are financial incentives tied into the reduction in storm water runoff from green roofs. In addition, the environmental benefits of green roofs have been recognized in the Leadership in Energy and Environmental Design (LEED) program of the U.S. Green Building Council. Building designs incorporating a green roof covering at least 50% of the roof area can earn one LEED rating point for urban heat island reduction and one point for storm water management.

## **SCOPE AND PURPOSE OF THIS DOCUMENT**

This report is intended to provide the reader with an introduction to basic green roof concepts: what they are, how they are built and what benefits they provide. This report is designed to serve as a useful starting point for anyone interested in developing and evaluating a green roof installation in Los Angeles and to help facilitate the development of a green roof pilot project by the City of Los Angeles. Once an interested party has selected a suitable site, the roof design, installation, maintenance, and monitoring can be conducted by a suitable team of engineers, landscape architects and other professionals using information from this report and the sources cited herein.

Information provided in this report focuses primarily on extensive green roofs. While much of the discussion here is also applicable to intensive roofs, the emphasis on environmental benefits and the fact that most roofs are not designed for daily access by building occupants (thus precluding development of an intensive green roof) dictates our focus on extensive green roofs.

Benefits of green roofs are described in detail in Section II: *Benefits and Incentives*. Green roof incentive programs that have been adopted by some cities in the U.S. are also described in Section II, together with the Los Angeles LEED certification program for City funded projects. Section III: *Planning for the Green Roof* provides information on identifying a suitable location for a green roof project, structural requirements, permitting and applicable building and fire code provisions in Los Angeles, and a comparison of typical cost ranges for green roofs vs. conventional roofs. Also discussed in Section III are potential green roof project funding opportunities via state and federal grant programs. Information on green roof design is provided in Section IV: *Designing the*

*Green Roof.* This section covers preparation of the roof surface, selection of a growing medium for the plants, selecting suitable plant species for the roof, and irrigation requirements. Section V: *Growing and Maintaining the Green Roof* provides information on proper maintenance procedures. An important element of a successful pilot program is a convincing demonstration of the beneficial environmental, economic, and social impacts of the green roof on the urban environment. Section VI: *Quantifying the Benefits* briefly discusses this topic. Finally, Section VII: *Additional Resources* provides contact information for selected City departments, as well as green roof and building/landscape trade organizations, programs, and publications that can be consulted for further information.

## **II. BENEFITS AND INCENTIVES**

### **ENVIRONMENTAL BENEFITS**

The environmental benefits for which green roofs have received the most attention are improvements in air quality, storm water runoff management, and energy efficiency. These benefits are closely interrelated as discussed in more detail below. Other benefits of green roofs include longer roof life, habitat creation, sound absorption, and improved aesthetics. Each of these green roof benefits are discussed in more detail below.

#### **Urban Heat Island Reduction and Associated Air Quality Benefits**

Over the past 70 years, as the City of Los Angeles has grown, temperatures in the city have increased. It has been reported that the high temperature in Los Angeles has shown a steady increase from 97 degrees Fahrenheit (36 C) in 1937 to 105°F (40 C) in the 1990s (HIG, 2000). This trend of increasing temperatures with increasing urbanization is commonly referred to as the Urban Heat Island (UHI) effect. Scientists believe that a significant cause of this effect is the replacement of areas covered by vegetation with dark colored building materials such as those commonly used on roads and roofs. These building materials absorb much of the sun's energy and become very warm, thus contributing to the UHI effect. Replacing dark roof surfaces with green roofs can help reverse this trend.

There are several ways in which green roofs act to reduce the Urban Heat Island effect. A dark colored roof will absorb far more of the sun's energy than a green roof. That energy will then radiate from the dark roof as heat. Results from the Chicago City Hall green roof have shown the summer afternoon surface temperature on an adjacent black tar roof to be as much as 50° F (28 C) hotter than the temperature on the City Hall's green roof. Even a nearby light colored roof had a peak temperature 11° F (6 C) higher than that of the green roof (City of Chicago, 2001). A green roof can attain an even lower surface temperature than a light colored roof due to the cooling provided by the plants' use of water via a process referred to as evapotranspiration. Depending on the type of plant, up to 99.9% of the water drawn up through the roots may be transpired through the leaves (CSU, 2002). Heat energy is drawn from the surrounding air to convert that water to water vapor, which produces a cooling effect. The evapotranspiration of 40 gallons (150 liters) of water (about what is transpired by a medium, properly watered tree in one day) would provide enough cooling to offset the heat produced by one hundred 100-watt lamps, burning eight hours per day (Rosenfeld et al, 1997).

The amount of cooling a green roof provides through evapotranspiration will depend greatly on the climate and on the design and management of the green roof. Cooling via evapotranspiration is directly related to the quantity of water delivered to the green roof. In Los Angeles, where the average annual precipitation is 15" (38 cm) (WRCC, 2004),

rainfall would supply an average of between nine and ten gallons per square foot of roof space annually (370 to 410 liters per square meters annually). Most of this precipitation occurs during the cooler weather months (November through March). Thus if cooling were to be provided by evapotranspiration during the summer, the water would need to be supplied by irrigation.

On many green roofs, it will be most practical to install drought resistant plants to minimize irrigation requirements and ensure healthy plants. Though such green roofs will provide less evaporative cooling, they will still provide cooling, thanks to decreased absorption of sunlight and the increased thermal insulation from plants and growing media. Other water management options include using gray water for irrigation or storing runoff occurring during heavy precipitation periods for later use. These options are discussed in more detail in Section IV.

Elevated temperatures contribute to poor air quality. A study by Lawrence Berkeley National Laboratory's Heat Island Group found that increasing the reflectivity of manmade surfaces and adding vegetation over just 15 percent of the convertible area in the Los Angeles Basin would reduce summer temperatures by 6 degrees Fahrenheit (3 C). This group further estimated that, due to the dependence of smog formation on temperature, ozone (the chief component of smog) would be reduced by about 10% (HIG, 2000). Temperature reductions have the added benefit of decreasing energy demand, as less energy is needed for air conditioning. This leads to further improvements in air quality by reducing the burning of fossil fuels at power plants and thus lowering emissions.<sup>1</sup> A study conducted for the City of Chicago found that greening all the City's rooftops would cut peak energy demand by 720 Megawatts (Velasquez, 2004). The Heat Island Group estimates that the 5 to 9 degree (3 to 5 C) possible reduction of the Urban Heat Island would save Los Angeles ½ to 1 Gigawatt in peak power (HIG, 2000).

Aside from the air quality benefits associated with reducing the urban heat island, green roofs filter particulate matter from the air and absorb greenhouse gases. Though little research has been done to quantify the air filtration capacity of green roofs, by one estimate 1 (one) square meter of grass roof can remove approximately .22 lb/year (0.1 kg/year) of airborne particulates (GRHC, 2002). Gasoline fueled passenger vehicles typically produce on the order of  $2.5 \times 10^{-5}$  lb (.01 g) of particulate matter per mile of travel.<sup>2</sup> Assuming 10,000 miles are driven by a vehicle in a year, that's .22 lb (0.1 kg) of particulate matter per year. Thus, while it is one of the smaller benefits of green roofs, one square meter of green roof could offset the annual particulate matter emissions of one car.

The benefit of green house gas sequestration by a green roof is also difficult to quantify. However, as the City of Los Angeles is in the process of updating the City's Climate

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<sup>1</sup> See Stoeckenius et al. (2001) for a more detailed discussion of the interaction between the urban heat island and air quality in Los Angeles.

<sup>2</sup> Based on a typical estimate obtained from the U.S. Environmental Protection Agency's MOBILE6 vehicle emission factor model.



Action Plan (C.A.P.), originally issued in March 2001, it is worth noting that green roof plants will act as a greenhouse gas sink. The practice of planting trees to offset carbon emissions has gained wide acceptance. The Energy Information Administration (EIA) reported a total of 32 urban forestry projects implemented in 2002. An estimated total of 15,904 tons (14,428 metric tons) of carbon dioxide has been sequestered by these projects. The plants on an extensive green roof act on a smaller scale than do the trees used in these projects. However, the EIA does cite one project using prairie grasses, which probably have a more comparable carbon sequestration capacity, as having sequestered close to 770 tons (700 metric tons) of carbon in 2002. Unfortunately, the area covered by the project was not cited, so this result can't be applied to estimate the potential sequestration capacity of a roof-sized area (EIA, 2004).

## **Water Quality**

Stormwater management has become a pressing issue for many cities. As urban development continues, more and more of the city is covered by impervious surfaces (streets, buildings) that do not retain precipitation and thus produce greater and greater volumes of polluted runoff. The negative consequences of stormwater contaminated with trash, oil, and other toxins entering natural bodies of water are well established. Title IV of the Clean Water Act states that large cities must obtain a permit for stormwater discharges and develop procedures to mitigate impacts on water quality. The City of Los Angeles is no exception. On a rainy day, up to 10 billion gallons (38 billion liters) of water flows off the rooftops and streets of L.A. County and into the storm drain system, carrying with it everything from heavy metals to paint thinner (LA SWP, 2004). This water eventually arrives at Los Angeles area bays and beaches, making coastal waters unsafe for swimming or fishing and damaging local marine ecosystems. The City of Los Angeles must undertake a number of mitigating measures in order to comply with the National Pollutant Discharge Elimination System (NPDES) Permit, which applies countywide, and was issued to the County of Los Angeles. Other cities have also identified green roofs as a measure for reducing storm water runoff.

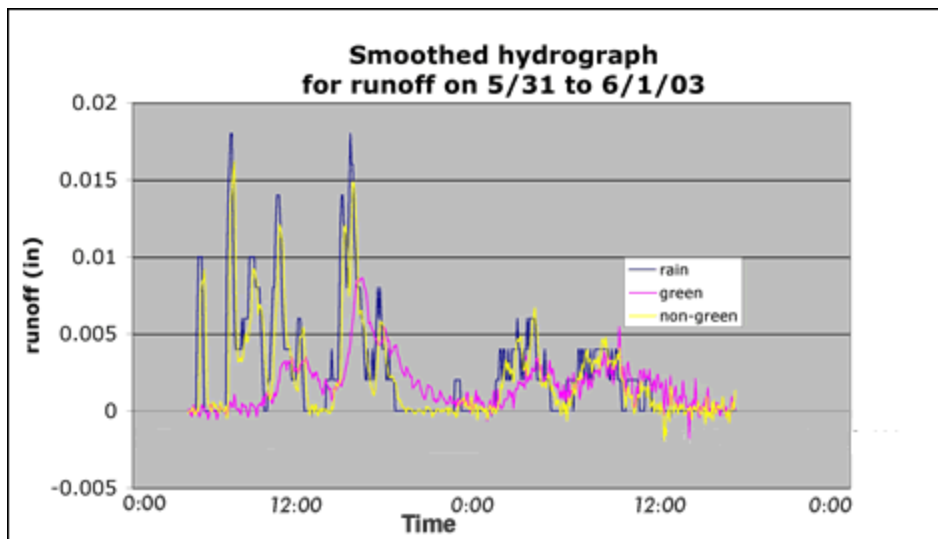
The City of Portland Bureau of Environmental Services has found that a green roof captures and evaporates ranges between 10 and 100 percent of precipitation (BES, 2004), with individual values dependent upon the design of the roof and the nature of the precipitation event. Different growing media have different water capacities, depending upon their depth and texture. Generally speaking, soil with fine particles and greater depth will have a greater water capacity (NebGuide, 1996). However, the growing media used for extensive green roofs is specially engineered to be lightweight and relatively shallow, while retaining the ability to support plant growth. Roofscapes Inc. reports that a typical green roof with just three inches of growing media can be designed to reduce annual runoff by more than 50 percent (Roofscapes Inc., 2002).

The volume of a precipitation event that is captured by the green roof is only partially dependent on the design of the green roof. Any green roof will, after a certain quantity of rainfall, become saturated and incapable of retaining more water. To deal with this

eventuality, many systems include a cistern which captures the excess precipitation as it leaves the roof and stores it for irrigation during prolonged dry periods.

Some of the water that is captured by the roof will be used for plant growth; even more will be returned to the air by direct evaporation or evapotranspiration; and finally a portion of it will slowly percolate through the soil and exit the roof as runoff. But in addition to the quantity of runoff from a green roof, there are several important differences in the timing and quality of runoff that results from a green roof, as compared to a conventional roof. The rainfall that is not captured by a green roof will be released over a longer period of time than the runoff from immediately after the rainfall event, and with a flowrate per unit surface area nearly equal to that of the precipitation rate. In contrast, the runoff from a green roof occurs over a period of hours following the rainfall, and it never reaches the high flowrates of the conventional roof. This slowing of the runoff lowers the force of the stormwater, which in turn reduces its ability to carry off trash and lessens the strain on the storm drain system.

The runoff that slowly seeps through the green roof media tends to be of much higher quality than the runoff from a conventional roof. Runoff from a green roof is of a significantly lower temperature than that from a conventional roof. This is important due to the disruption that warm stormwater can cause in the ecosystems of streams, rivers, and the ocean. Also, it has been estimated that up to 30 percent of the nitrogen and phosphorus contained in runoff from urban areas originates in the dust that accumulates on rooftops and other surfaces. The green roof acts as a filter, screening out this contamination (Miller, 2003).



**Figure II-1.** Measured values of rainfall and runoff rates for a conventional and green roof. Source: PSCGRR, 2004.

Reductions in stormwater volume and improvements in stormwater quality that can be achieved have been a tremendous motivating force in the development of green roofs in cities from Berlin, Germany to Portland, OR. Some cities have subsidized or even

mandated the installation of green roofs to improve stormwater management. The multiple benefits that can be achieved, and the relatively low cost when compared to costly stormwater management infrastructure projects, make green roofs an appealing option for stormwater management plans.

## **Energy Efficiency**

Potential energy savings associated with green roofs have already been discussed above in terms of controlling the urban heat island effect for air quality benefits. But the potential energy reduced cooling load would be particularly advantageous in Los Angeles, given the importance of air conditioning as a fraction of total energy consumption and recent concerns about generating capacity. Direct savings in energy costs from installing a green roof are also one of the factors that offset the cost of installation.

A green roof keeps an individual building cool in several ways. First, less of the sun's energy goes to heating up the roof of the building. The plants reflect some sunlight and absorb the rest, but they do not radiate the absorbed energy in the form of heat to the extent that conventional rooftops do. A conventional rooftop reradiates some of the sun's energy it absorbs back into the air, warming the building's surroundings, and radiates some of the absorbed energy into the building itself. Both of these heating pathways have been shown to increase demand for energy for cooling.

Another way in which a green roof can provide energy savings is via increased insulation. A green roof provides an additional barrier between the building's interior and the hot (or cold) environment. In this way it acts much like conventional insulation materials. But in addition to the mere value of its bulk, a green roof effectively shields the building's structural surface from the wind by trapping a layer of still air over the roof. Still air forms an effective thermal barrier on the surface of a building; as opposed to moving air, which greatly increases the transfer of heat from the surrounding environment into the building (or draws warmth from the building on cool days). Wind can decrease the energy efficiency of a building by 50 percent (Peck et al, 1999). Thus by protecting the surface of the building from the surrounding environment, the green roof helps to maintain the temperature differential between the interior and exterior of the building.

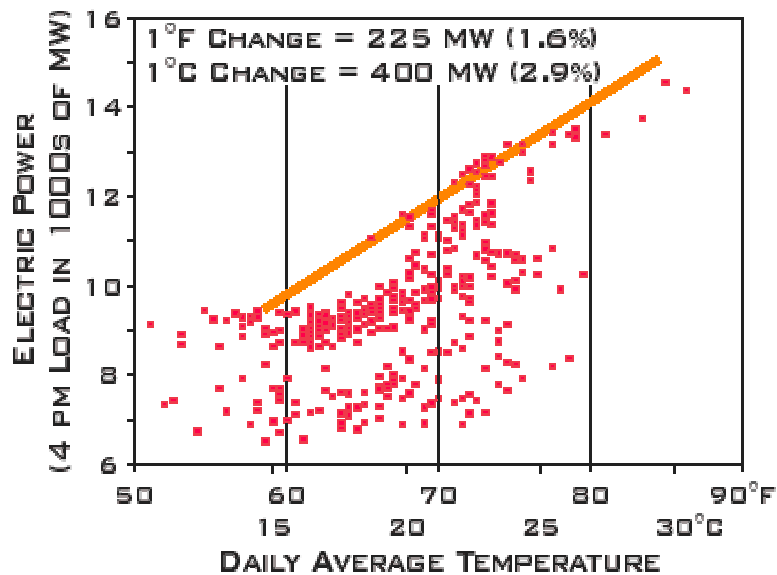
In contrast to the energy savings mechanisms (described above) that relate to protecting the building from the environment, the final way in which a green roof saves energy on hot days is by cooling the environment around the building. The cooling effect of evapotranspiration was discussed in detail in the previous section on the urban heat island.<sup>3</sup> One study has estimated the direct savings from the combined mechanisms is a 50 percent savings on air conditioning for the top story of the building, but no other studies have been conducted comparing the relative importance of the various combined mechanisms that allow green roofs to help keep buildings cool on hot days (Velasquez,

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<sup>3</sup> Cooling via evapotranspiration is minimal during cold weather.

2004). Actual energy saving for a particular building may be affected by the size of the roof compared to the height of the building.

More than just benefiting the individual property owner, the increased energy efficiency offered by green roofs serves the entire community. Modeling by the Heat Island Group has indicated that by adding vegetation and lightening roof and road surfaces in just 15 percent of the possible areas of the Los Angeles Basin, summer temperatures could be reduced by 6 degrees Fahrenheit (3 C) (HIG, 1999). Based on the relationship between temperature and energy use shown in Figure II-2, this would translate into upwards of ½ Gigawatt less peak power, worth more than \$100,000 per hour (HIG, 1999).



**Figure II-2.** Peak Load for Southern California Edison in 1988. Source: HIG (1999).

### **Additional Benefits**

There are some other very practical additional benefits associated with green roofs:

Green roofs have proven to be an effective form of noise reduction. Tests have indicated that 5 inches of growing medium can reduce noise by 40 Db (Peck et al, 2001). The green roof at GAP Inc. Headquarters in San Bruno, CA is estimated to attenuate sound transmission by up to 50 Db. This is an important consideration given that the building is located just a couple miles from San Francisco International Airport. In Germany, where green roofs are relatively common, the Frankfurt International Airport has installed green roofs on buildings below the approach flight path to mitigate the impact of an airport expansion project (Roofscapes Inc., 2002c). In the United States, the Federal Aviation Administration classifies average noise levels above 65 dB as “significant”; this designation is one factor considered in providing federal funds for noise mitigation projects (FAA, 2004). Noise from aircraft operations can easily exceed this level: take-off noise of a Boeing 747 measured at ground level directly under the aircraft 4 miles (6500 m) from the start of the take-off roll can reach 100 dBA (FAA, 2002). For buildings located near airports, especially those with limited alternatives for

noise reduction technologies (e.g. those with no attic space), a green roof offers a potential solution to the problem of reducing aircraft noise.

Green roofs also offer a greatly extended lifespan over that of a conventional roof. Where the membrane of a conventional roof is more exposed to the elements and thus wears relatively quickly, the membrane of a green roof is shielded by a protective layer of plants and growing media. A green roof can easily last 35 to 40 years, whereas a conventional roof will only last 15 to 20. Having to replace the roof only about half as often is not only more convenient, it also reduces the quantity of roofing materials that need be disposed of and equates to substantial savings that represent one of the most important offsets of the higher initial cost of a green roof.

And finally, less quantifiable but no less important benefits of green roofs are those related to habitat, both animal and human. Green roofs can be designed as a stepping stone through the urban environment for birds and insects or as a sanctuary for certain plant or animal species. The Toronto City Hall Demonstration Project provides two distinct sanctuaries. It includes a black oak prairie ecosystem and a separate native butterfly plot (GRHC, 2002). Green roofs also improve the human environment. Most would agree that the view of a green roof is much more aesthetically pleasing than that of a conventional roof. In some cases, green roofs have been used to blend a building into its environment, such as the GAP Headquarters' roof which features native grasses that help it blend into the surrounding hills. In a more urban environment, green roofs are more likely to offer relief from the surroundings, providing green interludes in a landscape dominated by concrete.

## **INCENTIVE PROGRAMS**

Several existing or potential future programs add to the attractiveness of installing green roofs in Los Angeles. In all likelihood, as the image of a green city becomes increasingly politically and economically appealing, and as the penalties in energy expenses and noncompliance with environmental regulations for not being green increase, the list of incentives will grow. The major existing incentive for the City of Los Angeles to add green roofs is achieving LEED certification.

### **Existing Incentives**

Effective July 1, 2002, all City of Los Angeles building projects 7,500 square feet (700 square meters) or larger are required to achieve Leadership in Energy and Environmental Design (LEED) 'Certified' standards (Council File 02-0182). A number of LEED certified City buildings have already been designed, including police and fire stations, the Lakeview Terrace branch library (platinum certification), a teaching center, and an animal services center (Weintraub, 2003). LEED certification is awarded based on a point system that gives a building points for numerous different conservation measures (26 points achieves certification). Among the possible measures are stormwater management, the use of landscaping and exterior design to reduce heat islands,

optimization of energy performance, and improving thermal comfort (US GBC, 2001). One or more of these measures could be met or partially met with the installation of a green roof. One green roofs design guide indicates that 50 percent or greater coverage of the roof by a green roof can earn one point for reducing heat islands and that a green roof can contribute to a point for stormwater management (Oberlander et al, 2002). Indeed, the Premier Automotive Group headquarters in Irvine, CA was awarded a least one LEED point for its extensive green roof, thus contributing to its achievement of LEED certification (US GBC, 2003). Thus far, none of the City's LEED building designs have included a green roof, although a constituent services center currently being designed for Council District 9 will incorporate rooftop plantings. Green roofs could be a valuable component of future designs.

### **Potential Future Incentives**

In acknowledging the stormwater retention benefits of green roofs, some cities have granted runoff charge reductions and/or increased building size to lot area ratios to buildings with green roofs. One example is the City of Portland, Oregon, which added the installation of a green roof, or an "ecorooft" (a term widely used in Portland) as a floor area ratio bonus option in 2001. Under this condition, a developer is allowed one or three square feet of bonus per square foot of green roof for a green roof that covers 30+ percent or 60+ percent of the roof, respectively. In addition, the City of Portland will offer property owners a reduction in their stormwater drainage fee if they install a green roof. (Liptan, 2004).

Like Portland, the City of Los Angeles has implemented a stormwater runoff charge to offset the costs of building infrastructure to comply with water quality regulations. The annual fee is determined by the amount of runoff from each property and runs about \$24 per equivalent dwelling unit. However, it is quite possible that this charge will be increased in the future. The need to install infrastructure to comply with regulations is surpassing the funds generated from the current stormwater charge (City of LA, 2003). A potential future incentive for developers could include a reduced stormwater charge for buildings with green roofs, founded on the stormwater reduction benefits they provide.

The City of Los Angeles is currently updating its Energy Climate Action Plan (C.A.P.), first issued in March of 2001. The C.A.P. estimates the CO<sub>2</sub> emissions from City of Los Angeles government operations and sets forth mitigation measures to reduce these emissions (LA EAD, 2001). Given their value in reducing energy consumption and hence the burning of fossil fuels, and their potential as a carbon sink, green roofs could be considered for inclusion in future plan updates. For example, the City of Cambridge, MA has taken that step by including green roofs in its Climate Protection Plan (City of Cambridge, 2004).

### **III. PLANNING FOR THE GREEN ROOF**

A number of elements must be considered in the design of a green roof. The unique characteristics of each building site dictate such things as maximum roof load limits, accessibility, and the rooftop microclimate, which influences plant selection and watering needs. City Building and Fire Codes contain provisions that influence green roof design. These design considerations are discussed in the following sub-sections. Also described here are estimated costs for installing and maintaining a green roof and potential sources of state and federal funding support for green roof projects.

#### **PICKING A SUITABLE LOCATION**

Not every building is equally suitable for a green roof. There are many factors to consider, such as ease of access to the building and the proposed roof area, climate, and the potential for achieving maximum benefits. These factors will play an important role in constraining the design of the green roof and in determining the impact, both environmental and political, of the installation.

#### **New or Retrofit**

The first distinction that must be made is whether a green roof will be installed on a new or existing building. In most cases it will be significantly less expensive to add a green roof to new construction rather than adding one to an existing building. Adding a green roof in the design stage will also allow greater flexibility in the design of the green roof and greater potential to maximize green roof benefits. Yet a retrofit project offers some unique possibilities for demonstrating green roof benefits.

The cost of green roofs generally varies from \$15 to \$25 per square foot (\$160 to \$270 per square meter) for replacing a conventional roof with a green roof, and from \$10 to \$15 per square foot (\$110 to \$160 per square meter) to install a green roof that has been included in new construction (BES, 2004). This cost difference between a retrofit project and a new project is not surprising. It is similar to the cost difference between reroofing a conventional roof versus installing a conventional roof on a new building. As Table III-1 shows, for both a new roof and a retrofit, the cost of a green roof is roughly comparable to that of a conventional roof when the life of the roof is considered. The General Services Division has indicated that the City of Los Angeles's conventional roofing costs fall at the lower end of the spectrum presented in Table III-1, ranging from as little as \$1.55 to \$4.60 per square foot (Reeser, 2004).

**Table III-1.** Cost Comparison of a Green Roof versus a Conventional Roof and a Retrofit versus a New Roof.

	Retrofit/Reroof				New Roof			
	Green Roof		Conventional Roof		Green Roof		Conventional Roof	
	Low End	High End	Low End	High End	Low End	High End	Low End	High End
Initial Cost*	\$15.00	\$25.00	\$5.00	\$20.00	\$10.00	\$15.00	\$3.00	\$9.00
Roof Life	35	40	15	20	35	40	15	20
Initial Cost Annualized Over Roof Life**	\$1.03	\$1.66	\$0.51	\$1.74	\$0.69	\$1.00	\$0.31	\$0.78

\*Source: BES, 2004. \*\*An annual interest rate of 6% has been used to make this comparison.

If a project is intended to demonstrate the advantages of a green roof, then a retrofit may be most suitable. Generally, more lead time would be involved in new construction than in a retrofit, due to the time required to design, fund, permit, and construct an entire building before the green roof can be installed. This delay may be unappealing if the objective is to transfer technology to an audience that can then consider implementing that technology in their upcoming projects. As a demonstration, a retrofit also offers the opportunity to make before and after comparisons on the quantifiable benefits of a green roof, such as building energy consumption and roof temperature. Provided the existing conventional roof is in need of reroofing, then as Table III-1 demonstrates, the cost of retrofitting with a green roof falls within the range of conventional reroofing costs. Similarly, for new construction, building with a green roof involves costs roughly similar to the upper end of conventional roof construction costs.

### Access

Whereas intensive green roofs may be implemented to provide open space for recreation and relaxation, extensive green roofs are implemented solely to achieve the many environmental benefits described in Section II. As a result, extensive green roofs are rarely designed with the idea of allowing building residents or the general public routine access to the roof. Even for an extensive green roof, however, it may be desirable to provide some access for educational purposes. In both types of green roofs, some degree of access is necessary for installation and maintenance.

Of the 14 green roof projects reported by the City of Portland, six allow limited public access (Hauth, 2004). Access to an extensive green roof does not mean allowing the public to tread wherever they wish over the roof. Most roof structures are not designed to support such activity and most green roof plants would not respond well to being stepped upon (Peck, 2004). Access is provided to educate, enhance appreciation, and encourage the general adoption of green roofs. Although for a demonstration project it would seem nearly essential to provide public access, doing so is not a simple matter. Again, most existing roofs have not been designed to support people or provide for their safety. Providing public access might require costly structural modifications. Other ways to view the roof could be considered if direct roof access is impractical. The roof may be



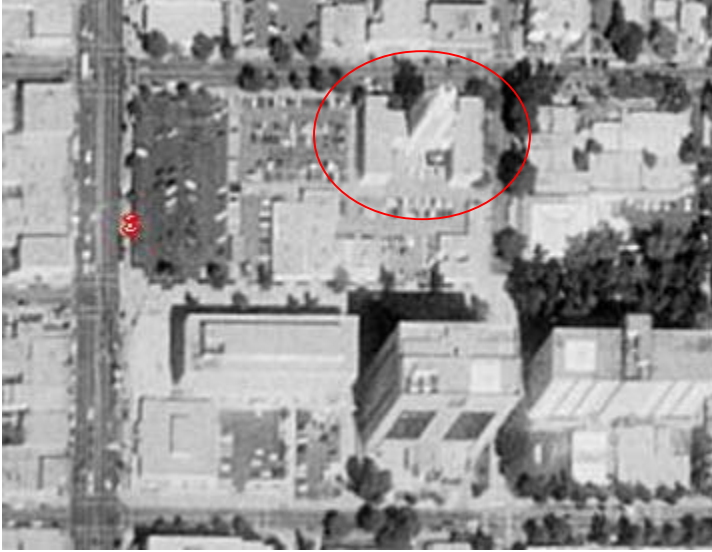
viewable from a nearby vantage point, or a virtual tour of the roof could be offered on the Internet through a web page offering details of the roof's design and construction and results of monitoring activities.

At a minimum, the roof will need to be accessible for construction and maintenance. In the construction phase, the ease of access to the roof can make a considerable difference in the cost of the project. Moving the materials to the roof by elevator and/or stairwell is less expensive in labor and/or equipment costs than doing so via utility ladders or by crane (Peck et al, 2001). Maintenance activities (plant care, roof membrane inspections) may be performed weekly, monthly or only a few times a year depending upon whether an automated irrigation system is installed and how much care the plants require. The majority of green roof owners in the City of Portland that reported the frequency with which they perform plant care said they did so only once per year. Most of these green roofs are established, and Portland receives adequate rainfall such that more frequent maintenance is not necessary. See the information in "Maintenance" and "Irrigation" later in the Section. At least one experienced green roof contractor recommends several annual inspections (Peck et al, 2001). Maintenance personnel would need to regularly access the roof more frequently than once per month only if irrigation were to be performed manually. Reporting their summer watering schedule, some Portland area green roof owners who water manually stated that they irrigate as frequently as a few times a week, where others reported watering only every two weeks. Most said they did so on an "as needed" basis (Hauth, 2004). Section 3210 of California Occupational Health and Safety regulations provides general guidance on the safety precautions necessary for maintenance workers at elevated locations. The California Department of Occupational Health and Safety can be consulted for details (California DOHS, 562-944-9366).

## **Location**

Two buildings on opposite sides of the city or even on opposite side of a street may present vastly different needs for a successful green roof. Temperature, winds, sun exposure and water availability can differ over small distances, depending upon the particular topography. Also worth noting is that the social and political impact of a green roof can vary greatly from one location to the next.

In order to highlight some of the key factors that should be taken into account when selecting a site for a green roof, we will examine two hypothetical candidate buildings. One building is the Van Nuys City Hall pictured in Figure III-1; the other is the Central Library seen in Figure III-2.



**Figure III-1.** Van Nuys City Hall (top center of image). Source: TerraServer, 2004.

Only about 15 miles (24 km) apart, these two locations experience different temperatures and receive differing amounts of precipitation (see Table III-2). These temperature and precipitation differences combined with the different microclimates of the two buildings to create two unique rooftop environments.

The Los Angeles Central Library appears to receive a great deal of shading from the U.S. Bank Tower. This would protect the plants on the roof from the most intense afternoon sun but perhaps limit the cooling benefits that would be achieved by a green roof. The Van Nuys City Hall might experience a similar effect, but only on the section of the roof that is shaded by the City Hall's own tower. Given the average 7-degree maximum temperature difference in the summer (June – August) plus the shading effects, there could be a 17 to 22 degree Fahrenheit (9 to 12 C) temperature difference between the two buildings' roofs at different points during the day. These factors have implications for the design and maintenance that would be required at each site. For example, they must be taken into consideration when selecting plant species and planning irrigation schedules.

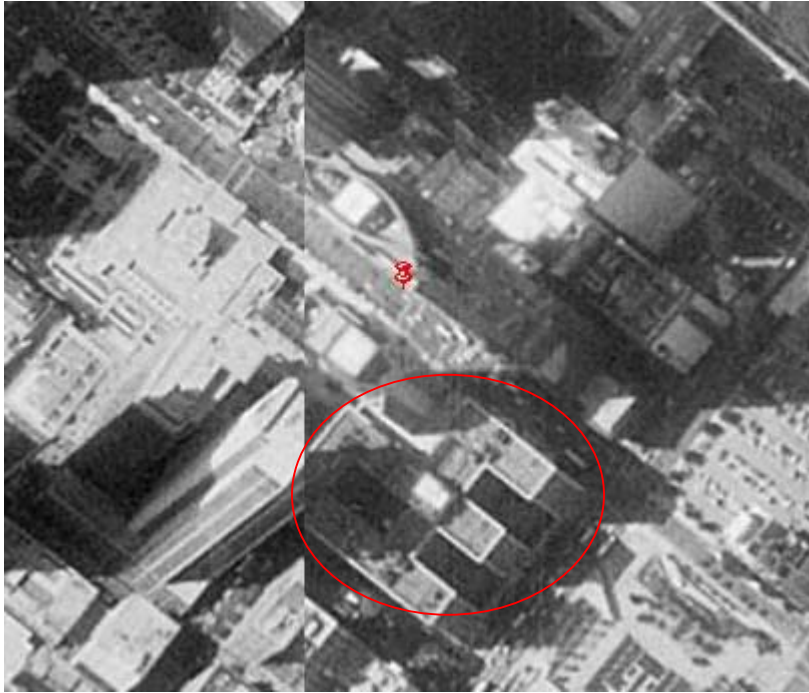
Another important aspect of the rooftop microclimate is wind speed. In general, wind speed doubles for every ten-story increase in height. The urban topography can also block and funnel winds, creating unusually weak or strong winds in unexpected locations. Strong winds can erode the rooftop media and dehydrate plants if proper precautions are not taken (City of Chicago, 2001b). In even moderately windy locations it is advisable to follow the precaution taken at the Chicago City Hall, which was to install a biodegradable mesh over the media to protect it from the wind, until the plants are sufficiently established to take over that role (City of Chicago, 2001; Peck et al, 2001).

Temperature, sun exposure, and wind intensity are all important climatic factors that will determine the design necessary to ensure the viability of a green roof. (Also see Section IV Designing the Green Roof.) However, the propagation of green roofs throughout the

City of Los Angeles may depend just as much on the social and political climate. This would be especially important for a demonstration project. One thing that could be assured by careful site selection is the visibility of the project. Returning to the Van Nuys City Hall and the Central Library, both appear to be locations where the project would receive high recognition. Both buildings' roofs are visible from nearby buildings and both buildings are open to the public. It may therefore be possible to offer a vantage point from which the roofs can be viewed from inside the building, or at least a space that could be used for an informational exhibit. Such amenities could lessen concerns about providing public access to the roof itself. Indeed, a location where the roof can be viewed but not accessed may be desirable to set a precedent of extensive green roofs as environmental and aesthetic assets, despite the lack of accessibility.

There are other elements of the site selection, apart from its location, that could contribute significantly to the success of a green roof installation. The design of the building itself will in several ways determine the potential benefits that can be achieved by a green roof. Two factors will be instrumental in determining the cooling effect of the green roof. First, the energy savings would be most impressive in a building with a high roof area to volume ratio. As noted in Section II, the energy savings on cooling are approximately 50% for the floor immediately below the roof (Velasquez, 2004). Hence a lower building with a broad roof area that can be covered by the green roof will show the greatest overall energy savings. In the case of an existing building, both energy savings and potential to diminish the urban heat island effect would be greatest for a building with an existing dark colored conventional roof. Dark colored roofs absorb far more of the sun's energy and, through the radiation of that energy as heat, cause a far greater impact on building energy use and urban temperature increase than do light colored roofs (City of Chicago, 2001; HIG, 2000). In an effort to maximize the net environmental benefit of the project, an ideal site would also provide the opportunity to irrigate the green roof using graywater. The Premier Automotive Group headquarters in Irvine, CA has successfully implemented a graywater irrigation system for their green roof, which has proven a great success (Borghese, 2004; Roofscapes Inc., 2004). Irrigation requirements will be discussed further in Section IV.

As seen in Figure III-2, the Central Library stands six floors tall and is dwarfed by the adjacent U.S. Bank Tower, the tallest building in Los Angeles County. Located just to the west of the Central Library, the U.S. Bank Tower is seen casting an afternoon shadow over the library roof. In contrast, the Van Nuys City Hall receives less shading due to the distance separating it from taller buildings. The City Hall's own 452-foot (138m) tower does, however, shade the flat portion of the roof where a green roof could be placed. Shading of a roof causes dramatic temperature fluctuations. Monitoring has shown that when the Chicago City Hall's green roof is in the shade of a neighboring building (around 4pm), the temperature of the roof drops between 10 and 15 degrees Fahrenheit (6 and 8 C) until it is exposed to sunlight once again, an hour later (City of Chicago, 2001).



**Figure III-2.** Central Library (bottom center). Source: TerraServer, 2004.

**Table III-2.** Annual Climate Summaries (1971-2000) for San Fernando (Van Nuys City Hall)<sup>1</sup> and L.A. Civic Center (Central Library).

		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual
Average Max. Temperature (F)	Civic Center	68	69	70	73	75	79	84	85	83	79	71	69	75.6
	San Fernando	66	70	73	74	78	86	92	92	87	80	68	65	77.8
Average Min. Temperature (F)	Civic Center	50	51	53	55	59	62	65	66	65	61	52	49	57.4
	San Fernando	43	44	44	45	50	55	59	60	56	50	42	42	49.4
Average Total Precipitation (in.)	Civic Center	3.3	3.9	2.7	1.0	0.3	0.1	0.0	0.2	0.3	0.4	1.1	2.1	15.27
	San Fernando	3.4	2.0	1.3	0.3	0.2	0.0	0.0	0.0	0.0	0.4	1.6	2.9	12.13

Source: WRCC, 2004

<sup>1</sup> San Fernando is the closest climate station to Van Nuys. The San Fernando Station and Van Nuys, though separated by a distance of approximately 9 miles, are both located in the San Fernando Valley and have similar climates in comparison to downtown Los Angeles.

## **STRUCTURAL REQUIREMENTS**

Many of the most significant constraints on the design of a green roof are imposed by the structure of the roof. These constraints are especially important in the case of a retrofit project. The slope and maximum load of the roof are the most important structural elements to consider.

### **Pitch Limitations**

Though green roofs have been installed in some cases on roofs with slopes of forty percent and more, doing so greatly increases the complexity of a project. To safely install a green roof on a roof with a pitch of greater than 2.5 inches per foot (about equal to a 20 percent slope) requires supplemental anchoring. Without additional support, the green roof may slide under its own weight (Miller, 2003). On the other hand, a perfectly flat roof would not provide ideal drainage conditions. For proper drainage, a minimum pitch of 1" in 10" (10 percent slope) is preferable (Kerry, 2004). Thus, there is an ideal range between approximately 10 and 20 percent slope. This is not to say that a green roof cannot be installed on roofs with a slope that falls outside this range. It should merely be considered that if one is installing a green roof on a roof with less than 10 percent slope, then care should be taken to ensure proper drainage. And if one is installing a green roof on a roof with a slope of greater than 20 percent, then some additional cost of securely anchoring the green roof should be anticipated. The exposure that the pitch of the roof presents to the sun and wind is also important to consider. A roof could quite possibly have two distinct microclimates defined by different exposures. In the Los Angeles climate, plants on a section of roof with a southern exposure will need to be especially hardy and well cared for to survive the intense sun. This will affect plant selection and the design of a maintenance plan, topics that will be discussed further in Section IV and Section V.

### **Load Requirements**

The modern extensive green roof features an engineered growth media that is much less dense than natural soil. Typical natural soil weighs approximately 100 pounds per cubic foot (1,600 kg per cubic meter) when wet. If five inches of natural soil were placed on a roof, it would weigh more than 40 pounds per square foot (or about 190 kg per square meter for 12 cm of soil) (Peck et al, 2001). The saturated weight of engineered media used for today's green roofs commonly falls in the range of 10 to 25 pounds per square foot (50 to 120 kg per square meter) (BES, 2004). This substantial weight reduction allows green roofs to be installed on many existing roofs without the need for structural reinforcement. Of course, if a green roof is included in the design of a new building, the roof structure can be engineered to supply much more freedom in media type and depth, which will allow for a wider range of plant species. Table III-3 presents the range of green roof installations offered by one company for different load limitations.

**Table III-3.** Example of Green Roofs Available as a Function of Weight.

<b>Saturated Weight</b>	<b>Plant Species</b>
13 – 17 lbs	Flower Carpet. Plant families: Sedum
17 – 23 lbs	Aromatic Garden. Plant families: Sedum, Sedum and herbs.
25 – 35 lbs	Savannah. Plant families: Sedum, Sedum and meadow grasses.
35 – 45 lbs	Meadow1. Plant families: Meadow grasses and turf.
35 – 50 lbs	Meadow 2. Plant families: Deeper depth than meadow.

(Roofmeadow, 2003b)

For any green roof project in Los Angeles, a licensed structural engineer or architect, as required by Sections 5538 and 6745 of the California Business and Professions Code, will need to ensure that the building's structure will support the additional dead load and earthquake load of the green roof (Lee, 2004). If the roof will be accessible to the public, the structure will also need to support an additional live load. This engineering analysis of the roof structure will define the maximum weight of the green roof. In many cases, the position of supporting columns in the building's structure will lead the maximum permissible weight to vary across the roof, allowing more flexibility of design in some areas. Without such an analysis, there is no way to safely determine an appropriate design. However, one clue has been identified to determine the feasibility of a green roof project before enlisting a structural engineer. Many roofs are ballasted, which means they are covered by a layer of material (often gravel) that by its weight holds the roof membrane in place. The common river rock ballast weighs approximately 12 pounds per square foot (59 kg per square meter) (Greenroofs.com, 2003). The ballast would be unnecessary in a green roof system, which would immediately free up approximately 12 lbs/sf (59 kg/sq m) for the green roof.

## **PERMITTING REQUIREMENTS – CITY OF LOS ANGELES**

Given the rather recent entrance of green roofs into the US marketplace and certainly into Southern California, clear procedures for permitting them have yet to be developed, although there are no regulations prohibiting green roofs. Information obtained from various City of Los Angeles departments indicates that the design and safety criteria relating to extensive green roofs are for the most part similar to those associated with a conventional roof and are likely to be easily addressed in the design of the green roof.

### **Building Permit**

Green roofs are not explicitly mentioned in the Los Angeles Building Code (Lee, 2004). For the current process in the City of Los Angeles, please see Figure III-3. As with any other project, plans need to be approved by the City of Los Angeles Department of Building and Safety. In other cities, green roof professionals have found that the wet weight of the green roof is treated as an additional dead load and regulated as such under the guidelines of the International Code Council (ICC) (Miller, 2003). It is reasonable to

expect that the same will be true for the City of Los Angeles, as the City's Building Code is based on the 1997 Uniform Building Code and published by the ICC. The additional concern regarding loading in the Los Angeles area will be the earthquake load. Consultations with personnel in the Department of Building and Safety indicate that a permit will be issued for the construction of an extensive green roof so long as the dead load and earthquake load of the roof is safely within the supporting capacity of the building structure. Again, ensuring that the design meets those guidelines will require the services of a licensed structural engineer, civil engineer or architect as required by Sections 5538 and 6745 of the California Business and Professions Code (Poursabahian, 2004; Poursabahian, 2004b).

### **Fire Safety Provisions**

Some important issues have been raised regarding the fire hazard presented by a green roof. These concerns relate to the flammability of materials on the roof, occupancy of the roof, and fire department access to the building via the roof. The Building Code prohibits combustible materials on the roof of buildings over a specified height without having adopted certain precautions (Hernandez, 2004). The first measure that is recommended by green roof professionals is to avoid installing plant species such as mosses and grasses that could be particularly flammable if allowed to dry out (Greenroofs.com, 2003). However, if certain precautions are taken it should not be necessary to limit plant selection based on these criteria. If a sprinkler system were to be installed that could be activated in case of fire that could be sufficient for the Los Angeles Fire Department. The Fire Department may also grant a variance in the absence of a sprinkler system if a maintenance plan shows that the roof will be maintained in such a condition that it will not present a fire hazard (Hernandez, 2004). The irrigation required to prevent plants from becoming flammable varies greatly between plant species. Sedums, with their fleshy water-storing leaves would not easily burn, even in near drought conditions. In contrast, many mosses would burn easily after only a brief dry spell. Thus, the frequency of watering needed to prevent fire danger will depend on the species present. Chapter 5, Article 7, Division 21 of the Los Angeles Municipal Code (the LA Fire Code is Chapter 5, Article 7 of the LAMC) presents the LAFD's current guidelines on what vegetation presents a fire hazard (LAMC, 2003).

Roof occupancy concerns would generally not be applicable to extensive green roofs due to their usual inaccessibility. However, in the case of a demonstration project, allowing for visits by small groups may be a desirable attribute. Intensive green roofs are designed for frequent access with minimal restrictions and thus require special treatment. General access by building occupants to the roof requires specific safety measures (railings, etc.) as specified in the Los Angeles Fire Code.

The allowable rooftop access is determined by two factors, the allowable *occupant load* determined by the Fire Department, and the *occupancy type* defined by the Building Code. The occupant load determines the number of exits, and the occupancy type determines whether an occupied roof is permitted for a specific building. (Poursabahian,

2004b). The method used by the Fire Department to determine the allowable occupant load is detailed in Chapter 5, Article 7, Division 33 of the LAMC. Table 5B of the City of Los Angeles Building Code defines the characteristics necessary for a given occupancy type to be permitted on the roof of distinct building types (Poursabahian, 2004). The LA Department of Building and Safety (LADBS), in coordination with the LAFD, has recently stipulated that certain roof uses on apartment buildings can be classified as “R-1” occupancies instead of the more restrictive “A” type occupancy (Hill, 2004). Even in the case that an assemblage was allowable, it would most likely need to be of limited size. For example, an assemblage of over ten or more occupants would require the availability of a second stairway exit per Section 91.1004.2.3 of the City of Los Angeles Building Code. (Hernandez & Malki, 2004). Additional exits would be required for assemblages of 500 occupants or more. In addition, any accessible green roof requires compliance with the Los Angeles Building Code, Chapter 11B. For more information on rooftop occupancy type and occupant load, readers should consult the Los Angeles Building Code and the City’s Fire Code.

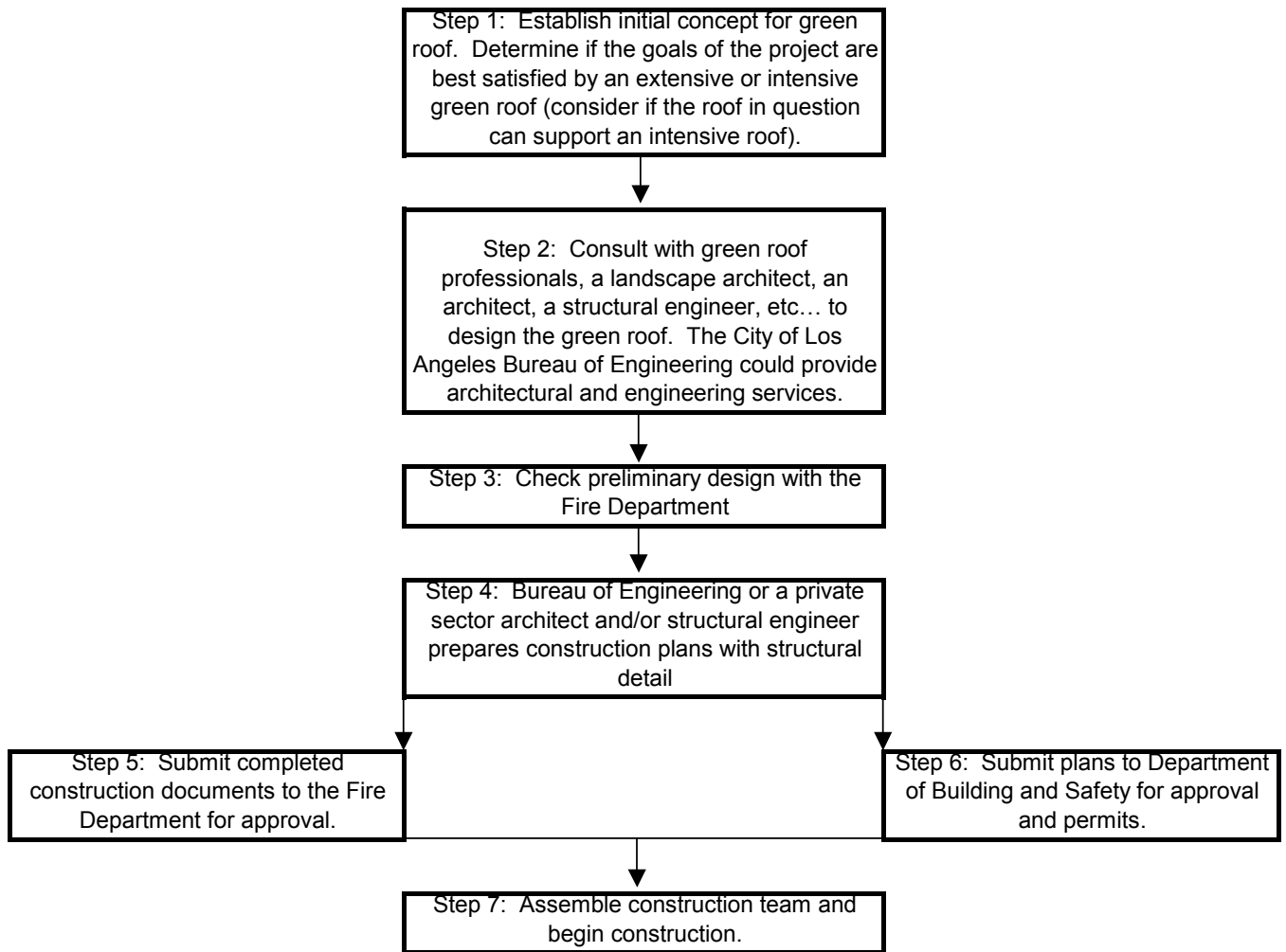
The Fire Department will also be concerned about preserving roof access for firefighters in case of emergency. The Fire Department wants existing access to roofs to remain unobstructed. Preserving emergency access to the roof should not be a problem. Green roof professionals commonly recommend leaving a 24” (61 cm) non-vegetated perimeter around the edge of the roof as a fire break and to ease access for firefighters (Greenroof.com, 2003). Existing access points such as skylights, roof hatches, stairwells, etc., should not be obstructed (Hernandez, 2004). In addition, the Fire Department sometimes ventilates buildings by cutting through the roof. This is not a concern for concrete or metal clad roofs, as those types are not cut. But in the case of a roof type that could be cut, the Fire Department wishes to preserve that possibility. Doing so could mean demonstrating that the green roof could either be quickly moved, or it may mean maintaining areas of the roof without vegetation. The Fire Department can be contacted for a walk-through of a site in order to determine the best course for addressing these concerns (John Vidovich, Building Standards Unit, City of Los Angeles Fire Department, 213-482-6907).



## **PROCEDURE – CITY OF LOS ANGELES**

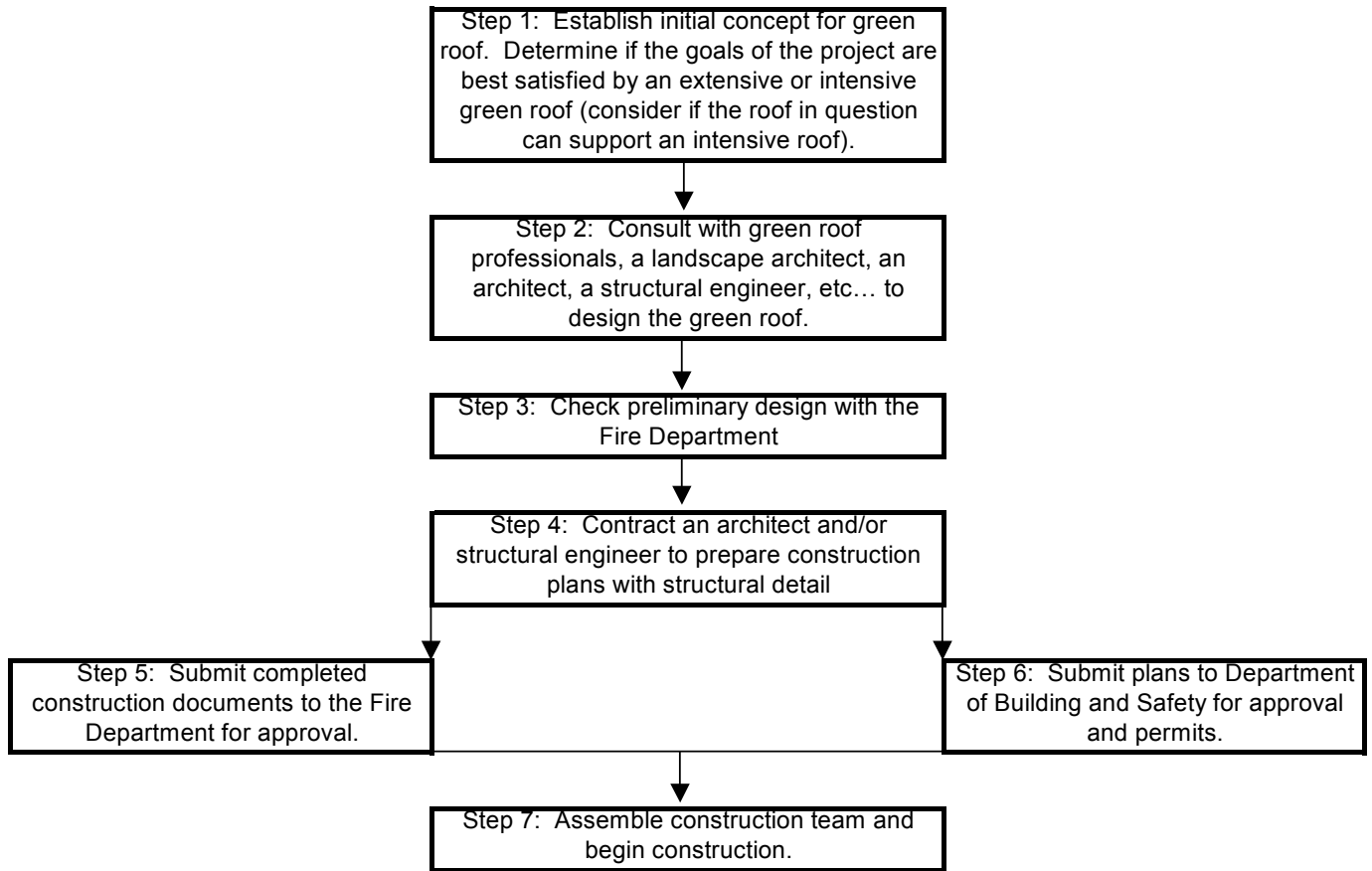
There are some necessary steps common to all green roofs. Steps outlined in this section relate to obtaining the required approvals from those City of Los Angeles departments that will be involved in a green roof project. Figure III-3 shows the path that a public agency in the City of Los Angeles would follow to implement a green roof; Figure III-4 shows the corresponding process for non-city owned buildings. Incorporating a green roof in certain types of City projects may require additional approval from the City's Planning Department. Contact the Planning Department if the project falls under an existing Planning document, such as the "Mulholland Corridor Specific Plan," or for any entitlement actions. This approval would need to be obtained at the same time as the Department of Building and Safety's plan check (Step 6 in Figures III-3 and III-4). Contact information for the departments indicated in Figures III-3 and III-4 can be found in Section VII.

**Figure III-3.** Procedure for a Public Agency to Implement a Green Roof.



Note: Changes to existing Planning documents, or new entitlement actions require the approval of the Planning Department.

**Figure III-4.** Procedure for a Private Entity to Implement a Green Roof.



Note: Changes to existing Planning documents, or new entitlement actions require the approval of the Planning Department.

## **COSTS (DESIGNING, BUILDING, MAINTAINING)**

The cost of a green roof is highly variable, depending upon the complexity of the design and the existing roof conditions. For the purpose of this discussion, unless otherwise stated, it will be assumed that the roof has sufficient structural support and the only costs will be those directly involved in the design and construction of the green roof. We are still left with a wide range of costs depending upon the complexity of the design and whether it is new construction or a retrofit. The cost estimates described in this section provide a basis for determining what can be achieved at what expense.

### **Design and Build**

The cost of the Chicago City Hall green roof retrofit (Figure III-5) was about \$1.5 million, or about \$75 per planted square foot (\$810/sq m); a conventional reroofing would have cost an estimated \$1 million. This project includes both extensive and intensive portions. The Multnomah County Building green roof retrofit (Figure III-6) in Portland, Oregon, another green roof, cost only \$17 per square foot (\$180/sq m) to construct. Costs can vary between different green roofs depending on the complexity of the design.



**Figure III-5.** Roof of Chicago City Hall



**Figure III-6.** Section of Multnomah County Building Roof.

A survey of extensive green roofs in the Portland area revealed costs from under \$10 per square foot (\$110/sq m) to just over \$20 per square foot (\$220/sq m) (Hauth, 2004). The Portland Bureau of Environmental Services provides a similar estimate, suggesting green roofs cost from \$10 to \$25 per square foot (\$110 to \$270/sq m) including labor, materials, and structural upgrades. A conventional roof costs from \$3 to \$20 per square foot (\$30 to \$220/sq m) (BES, 2004). According to a consultant on the project, the green roof on the GAP headquarters in San Bruno, CA, cost approximately \$24 per square foot (\$260/sq m) (Kephart, 2004). In comparison to the Portland green roofs, the cost of the GAP green roof is higher, because the GAP roof was one of the first green roof projects by an American corporation. It was completed in 1995, where most of the Portland area green roofs were constructed in the last few years. The costs of green roofs have declined, and the GAP green roof would probably only cost \$11 to \$14 per square foot (\$120 to \$150/sq m) today (Kephart, 2004).

The costs of a green roof are higher than those of a conventional roof due to the greater complexity of the system involved and to the greater specialization required of the roofing contractor. Roughly, the costs of a green roof can be broken down as follows (Peck et al, 2001):

- 5% - Design
- 5% - Project administration and site review
- 40% - Reroofing with root-repelling membrane
- 20% - Green roofing system (drainage layer, growth media, protective mesh, etc...)
- 5% - Plants
- 15% - Installation/Labor
- 10% - Irrigation system

The specifics of the green roof system will be explored further in Section IV. What may be surprising, considering the complexity of the green roof system, is that when the life of the project is considered, the cost difference between a green roof and a conventional roof is quite small. This point was touched on in Section II. When the considerably longer life of a green roof is included in the comparison by annualizing the cost of the roofs over their expected lives, a green roof's equivalent annual cost is between \$1.03 and \$1.66 per square foot (\$11.10 and \$17.90 per square meter) for a retrofit versus that of \$0.51 to \$1.74 per square foot (\$5.50 and \$18.70 per square meter) for reroofing with a conventional roof<sup>2</sup>.

## **Maintenance**

A green roof does have higher maintenance costs than a conventional roof. Maintenance activities that must be performed on a green roof are weeding, replanting, and inspections of the waterproof membrane. According to Peck et al. (2001), the intensity of the plant care activities should decline substantially after the first two years, when the plants are firmly established. Inspections of the roof membrane are complicated by the fact that the membrane is in most places hidden underneath the growth media. They can be greatly facilitated by some foresight in the design of the green roof. Keeping the areas that are more vulnerable to leaks (joints, penetrations and flashings) free of vegetation and growth media is recommended. The green roof can also be divided into distinct compartments which can be moved for inspections or, when the time comes, after 30 to 50 years, for the replacement of the membrane. Electronic leak detection services are also available. Please refer to "Preparing the Roof" in Section IV. As Peck et al. point out, conducting several annual plant inspections and an annual inspection of the roof membrane entails an annual expense of approximately \$1 per square foot (\$10 per square meter).

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<sup>2</sup> Annualized estimates are based on an amortization calculation over the life of the roof assuming an annual interest rate of 6%.

## **Irrigation**

The other recurring cost that must be considered is irrigation. The specifics of developing an irrigation plan will be discussed in detail in Section V. Irrigation will be necessary to maintain a healthy green roof in the Los Angeles climate. As one green roof professional stated, it would probably be possible to maintain a living non-irrigated green roof in Los Angeles, however there's a difference between living and looking good (Miller, 2004). In addition to the aesthetics there's also a strong relationship between water availability and the cooling benefits that the roof will provide. The greater the vegetated coverage and evapotranspiration of water, the greater the cooling benefits will be. Unfortunately, there are few examples of green roofs in the Los Angeles area, and those that do exist have not tracked the quantity of water applied to the green roof. However, there are a multitude of excellent resources for estimating irrigation requirements in California. Although none are specifically adapted for the rooftop microclimate, the available coefficients can be adjusted to approximate rooftop conditions. The thin growth media of green roofs and exposure to winds and intense sun suggests that the coefficients representing the most drying conditions should be used. Climate data for 1971 to 2000 shows an annual average of 15 inches of precipitation at the Los Angeles Civic Center (WRCC, 2004). Using a procedure for estimating landscape water needs developed by the University of California Cooperative Extension (UCCE, 2000), we have estimated that a green roof in Los Angeles will require approximately 0.9 cubic feet of additional water per square foot annually (6.7 gallons per square foot annually, or 270 liters per square meter), if irrigated by a highly efficient drip irrigation system (full details of this calculation are provided in Appendix A). The approximate annual cost of this water assuming a price of \$2.20 per hundred cubic feet (\$0.78 per cubic meter) of water (LA DWP, 2004) would be \$0.020 per square foot (\$0.22 per square meter) or about \$200 per year for a 10,000 square foot (930 square meters) green roof.

## **Summary of Costs**

Summing the average installation cost together with the estimated maintenance and irrigation costs described above yields a total green roof cost estimate presented in Table III-4. The benefits provided by a green roof are more difficult to anticipate and more difficult to value. However, to offer an idea of the range of direct benefits that can result from a green roof, it's worth noting that the City of Chicago is projecting an annual avoided energy cost of \$3,600 per year resulting from its 20,000 square foot (1,860 square meter) green roof (City of Chicago, 2001). That's merely the direct benefit resulting from decreased cooling expenses. Taking into consideration the many benefits provided by green roofs that were presented in Section II undoubtedly would yield a much higher total value. For example, one study to determine the value of several benefits of cool roofs (of which green roofs are one example) conservatively estimated the energy savings and improved air quality to have a present value (assuming a 20 year project life) of approximately \$0.72 per square foot of cool roof (\$7.70/m<sup>2</sup>) (Kats, 2003).

**Table III-4.** Estimated total annualized cost ranges per square foot of an extensive green roof installation in Los Angeles.

	<b>Reroof</b>	<b>New Roof</b>
Anticipated Life (yrs)	35 - 40	35 - 40
Annualized Initial Cost (per sf) <sup>3</sup>	\$1.35	\$0.84
Maintenance Cost (per sf)	\$1.00	\$1.00
Irrigation Cost (per sf)	\$0.02	\$0.02
Total Annual Cost (per sf)	\$2.37	\$1.86

## POTENTIAL FUNDING SOURCES

There are some potential funding sources that could help to defray the higher upfront cost of a green roof. The grants that have been obtained by past green roof projects have capitalized on the most established and easily quantified benefit of green roofs, which is stormwater management. However, as the energy efficiency, air quality, and urban heat island benefits are gaining wider attention, they too may provide avenues for funding.

☐ The California State Water Resources Control Board (SWRCB) administers three funding sources focusing on water quality, which may offer funds for a green roof. They are: the Clean Water Act Section 3.19 grant, Proposition 13, and Proposition 50. The Section 3.19 grant offers funding to many types of water quality improvement projects. A green roof could be classified as one the following projects, which are funded by this grant:

- controlling particularly difficult, nonpoint source pollution problems;
- implementing innovative methods for controlling nonpoint sources; and
- demonstration projects (EPA, 2004; Jerkevics, 2004).

Proposition 13 also offers funds for nonpoint source pollution control and Proposition 50 for watershed management. In 2003, the funds made available by the Section 3.19 grant, Proposition 13, and Proposition 50 were consolidated in one watershed protection, watershed management, and nonpoint source pollution control grant program. This made available up to \$138 million in grants via one application (SWRCB, 2004). According to SWRCB contacts, the 2005 grants will also be awarded through one combined competition. In addition to the grant programs, there is also the State Revolving Fund Loan Program, which offers low interest loans to projects that address nonpoint source pollution. This program is also administered by the SWRCB. More information about these sources of funding can be obtained through the SWRCB webpage (<http://www.swrcb.ca.gov/funding/index.html>), or by contacting the program administrators (Lauma Jerkevics; SWRCB, Section 3.19 Grant Program; 916-341-5498 and Jim Marshal; SWRCB, Integrated Regional Water Management Grant Program; 916-341-5636).

<sup>3</sup> Average of 35 year and 40 year annualized costs.

Funding may also be available based upon the pollution reduction and energy saving characteristics of a green roof. The EPA's Pollution Prevention and Source Reduction grants provide funding for a wide variety of projects aimed at eliminating pollution at the source. A green roof could qualify for one of these grants based upon its air quality and/or water quality benefits. The EPA's Region 9 office awards two or three Source Reduction grants annually in the amount of \$25,000 to \$50,000. The Source Reduction grants are available for public or private sector entities. In contrast, the Pollution Prevention grants are only available to state agencies (including air districts). Pollution Prevention grants offer funding of up to \$200,000. A private green roof might be able to gain access to the Pollution Prevention grants by partnering with an air quality district (Katz, 2004). Requests for proposals for both of these EPA programs are generally available in January. For more information, consult the EPA's Pollution Prevention website (<http://www.epa.gov/p2/>), or contact the EPA's Region 9 Pollution Prevention Office (John Katz, Pollution Prevention Coordinator, 415-947-3530). At this time, significant sources of funding for green roofs based on energy conservation do not appear to be available. The California Energy Commission offers low interest loans to public agencies pursuing energy efficiency measures, but the funding available for a green roof project would be minimal (Mills, 2004 )



## IV. DESIGNING THE GREEN ROOF

Green roof designs can assume a limitless number of forms within the bounds set by functional requirements and budget. Some of the constraints on the design have already been presented, most notably, the weight limit placed on the green roof by the roof structure and the roof microclimate. This section will present the additional elements of a green roof design required in order to ensure that the desired benefits of the green roof installation are achieved.

### LAYOUT

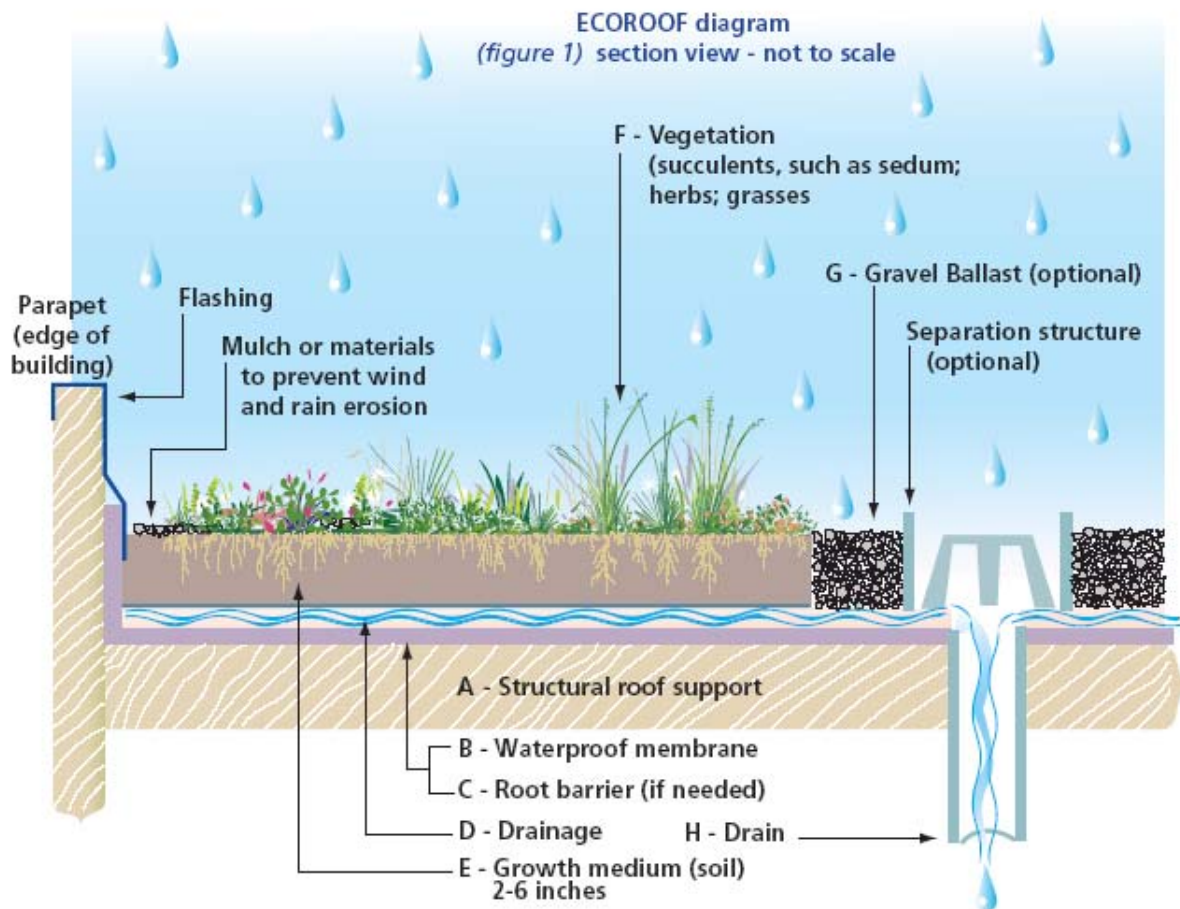
The layout of an extensive green roof must be such that all desirable and mandatory access is allowed for. If it has been decided, based on project goals and the roof structure, that access will and can be granted to the public, it will be necessary to restrict that access to prevent damage to plants (Peck, 2004). It may also be necessary to restrict access based on structural limitations. At Portland's Multnomah County Building (Figure III-4), though the vegetated portion of the roof is extensive, public access has been granted to a section of the roof for viewing. This section is clearly delineated from the green roof by a railing. In addition to being necessary to ensure public safety on a rooftop, the railing protects the vegetation and enforces the idea that extensive green roofs are not recreational open spaces.

Mandatory access provisions must be made for fire protection and maintenance personnel. The eventual repairs and replacement that are needed for any roof must also be planned for in the layout of the green roof. The Fire Department's requirements for a green roof, presented in Section III.C, can be met largely by the layout of the green roof. Ease of accessibility from all sides of the roof can be maintained by holding the vegetated sections back a minimum of two feet from the edge of the roof. Similar borders around building access points such as doors, skylights and hatches, will facilitate entering and exiting the building via the roof. Both of these are also important for maintenance personnel, who should have easy access to the roof from the building and who, for safety reasons, should not need to venture too near the edge of the roof. In fact, one of the California Department of Health and Safety approved safety measures for rooftop maintenance workers is a harness system that would prevent personnel from reaching the edge of the roof (Jett, 2004).

A carefully considered layout can provide for the survival of plants, even beyond the expected 35 to 40 year life of the roof membrane. In the short term, a few well distributed pathways could facilitate the work of building maintenance personnel and prevent plants from being trampled. If traffic on the roof will be infrequent, pathways may not be required, as the vegetation can support some foot traffic (BES, 2004). In the long term, if an open portion of the roof is available for storing displaced sections of the green roof while the waterproof membrane is repaired/replaced, it will avoid the time and cost of moving green roof materials to and from the roof (Peck et al, 2001). However, the benefits achieved by the green roof will depend on the area of roof that it covers. Greater coverage will lead to greater benefits. Thus, if it is decided to provide for such future storage space, the area preserved should be kept to the minimum necessary.

## PREPARING THE ROOF

The structure of a green roof departs from that of a conventional roof beginning with the roof membrane. Most green roof contractors will only guarantee their work if a new membrane is installed along with the green roof. As a result, the most advantageous time to install a retrofit green roof is when the existing membrane is scheduled for replacement. Although a green roof serves the function of protecting the membrane from exposure to the elements, it also exposes the membrane to potential penetration by roots. Roof membranes with some organic content (e.g. bituminous membranes) are particularly vulnerable to root penetration and/or micro-organic degradation (Peck et al, 2001). These types of membranes must be used in conjunction with a chemical or physical root barrier. Other membranes, such as those composed of synthetic rubber or reinforced PVC, generally do not need a root barrier (BES, 2004). An experienced green roof contractor or green roof materials provider will be able to determine if a root barrier is required for a given roof membrane. As seen in Figure IV-1, the waterproof membrane and root barrier form the base layer of the green roof.



**Figure IV-1.** Typical extensive green roof structure (source: BES, 2004).

Not depicted in Figure IV-1 is an optional electronic leak detection system. Such a system is not necessary and most green roofs have been implemented without it. However, it is something that some companies are recommending to deal with the difficulty of inspecting/repairing a membrane that is buried under four or more inches of media (Peck et al, 2001). Sometimes referred to as electric field vector mapping (EFVM), this leak detection technique does not necessarily require installing any additional material during construction of the green roof. It does, however, require that the membrane installed have certain electrical resistance properties. Certain types of EPDM (a rubber membrane) and aluminized membranes will not be compatible with EFVM (Roofscapes Inc., 2002d). Additional information on EFVM can be found on the International Leak Detection website ([www.leak-detection.com/news.html](http://www.leak-detection.com/news.html)). A green roof contractor should be able to provide further information on leak detection technology.

## **GROWTH MEDIUM**

The growth medium is the entire volume of material that will be available to the root system. This part of the system is responsible for storing the water and nutrients that plants need for survival, conveying excess water to drains, and doing so in a thin, lightweight layer. At the base of the growth medium is the drainage layer. The first measure to ensure proper drainage is to make sure water is not allowed to enter under the waterproof membrane. This is accomplished by placing flashing around the edges of the roof and around any roof penetrations (e.g. skylights) as indicated in Figure IV-1. Water percolating through a fully saturated layer of growing medium must not be allowed to pool, as this would threaten the impermeability of the roof membrane and create a risk of drowning the plants (Peck et al, 2001). Existing roof drains will normally be sufficient to evacuate water from the roof deck (City of Chicago, 2001b), but first the water must be conveyed to the drains. Drainage is generally provided either by a thin layer of gravel or by a manufactured drainage sheet (BES, 2004). Though both options are perfectly functional so long as they provide a minimum permeability of 7 in/minute (180 mm/minute) (City of Chicago, 2001c), the manufactured drainage sheet has the advantages of being lightweight and of including a fabric filter to prevent the passage of soil particles that could otherwise form obstructions in the drainage layer (Oberlander et al, 2002).

In designing the green roof drainage system, the possibility of capturing the water for later use should be considered. Doing so both reduces the roof's (and potentially the entire building's) water use and further alleviates the strain on the storm drain system caused by a large rainfall event. At a very basic level, the water can be passed from the roof to other plantings around the building. A very practical system would be to collect the runoff in a cistern from which it could be drawn to irrigate the green roof during dry periods. An impressive example of the use of stored runoff is the drainage system at the Peoples' Food Coop in Portland, OR. At that building, the runoff from the green roof is collected in a cistern which supplies both the building's toilets and its irrigation system (Hauth, 2004).

The second portion of the growth medium, which overlays the drainage layer, is the soil or "engineered media". This is a mixture of materials designed to fulfill the same function as natural soil but with about half the density, so as to save weight. Soil media for an extensive green roof typically ranges from 2 to 6 inches (5 to 15 cm) in depth (Peck et al, 2001). For

example, the Premier Automotive Headquarters in Irvine, CA, features a green roof with five inches of media. At least one green roof professional has recommended that 5 inches (13 cm) be considered a minimum depth in the relatively warm, dry South Coast climate (Miller, 2004). Greater soil depth results in greater water storing capacity, which will help plants through dry periods but adds weight.

Possible ingredients in the soil mix include: topsoil, compost, perlite, digested fiber, clay or shale, pumice and coir (coconut fiber) (BES, 2004). The major considerations in determining the exact mix for a specific project will be weight constraints and desired water retention. Germany's FLL (Forschungsgesellschaft Landschaftsentwicklung landschaftsbau e.V. or the Research Society for Landscape Development and Landscape Design), which Roofscapes Inc. indicates has been a reliable provider of information on green roofs for over 15 years, gives the guidelines for green roof soil media presented in Table IV-1 (Roofscapes Inc, 2003). Most extensive green roofs will have only one layer of media (multi-layered systems are more common for intensive green roofs) and should thus follow the guidelines in the first column of Table IV-1. Using the saturated density of the one layer extensive green roof together with a minimum recommended depth of 5 inches (13 cm) yields a weight of 21 to 36 pounds per square foot (100 to 180 kg/m<sup>2</sup>).

**Table IV-1.** FLL Recommended Soil Properties of an Extensive Green Roof.

	<b>One Layer (extensive roofs)</b>	<b>Multi Layered (intensive roofs)</b>
<b>PHYSICAL PROPERTIES</b>		
Water retention (compressed)	Min. 25%	Min. 35%
Water permeability (compressed)	Min. 2.4 in/min (60 mm/min)	Min. .02 in/min (.6 mm/min)
Air content (saturated)	Min. 25%	Min. 15%
Density (saturated)	50 – 87 lb/cf (0.8 – 1.4 g/cm <sup>3</sup> )	62 – 137 lb/cf 1.0 – 2.2 g/cm <sup>3</sup>
<b>CHEMICAL PROPERTIES</b>		
pH	6.5 – 9.5	6.5 – 8.0
Salt content of water extracted (if possible)	1 g/liter	
Initial organic matter	3 – 8 percent	
Nitrogen (N) slightly soluble	Max. 60 mg/liter	
Phosphorous	Max. 150 mg/liter	
Potassium	Min. 150 mg/liter	
Magnesium	Max. 120 mg/liter	

Source: City of Chicago, 2001c

As the majority of the materials selected for green roof media are lightweight, high winds can easily blow them from the roof before plants are firmly established and offer complete ground cover. It is generally recommended that a biodegradable mesh be installed over the growth media during construction. This mesh will protect the soil from wind erosion until the plants can perform that function (City of Chicago, 2001).

## CHOOSING THE RIGHT PLANTS

Although there is a substantial amount of guidance available on plant selection for green roofs, little of it is directly applicable to climatic conditions in Los Angeles. The majority of the information on green roofs comes from areas receiving much more precipitation than Los Angeles (~15 in/yr, 38 cm/yr), such as Chicago (~36 in/yr, 91 cm/yr) and Portland (~42 in/yr, 107 cm/yr). The same general plant characteristics are applicable in all these areas, but information on the performance of specific species is not currently available for Los Angeles. The nearly universally recommended plant characteristics for an extensive green roof are:

- perennial or self-sowing
- drought tolerant
- wind tolerant
- able to withstand temperature extremes
- need little mowing, trimming, fertilizer or pesticides
- fire resistant
- provide good ground coverage
- shallow root structure

(BES, 2004; Peck et al, 2001)

Plants with these characteristics are much more likely to survive the extreme rooftop climate. They also perform the function of stabilizing the growth medium and require little maintenance. One group of plants which commonly have the above characteristics is referred to as succulents. Of the succulents, sedums and sempervivums are commonly used on green roofs. Of course, the list of plants that will survive on a green roof grows longer as the budget for caring for those plants grows. A study by the Portland Bureau of Environmental Services found the following types of plants on Portland area green roofs:

Sedum, creeping ground covers, wildflowers, fescue, sempervivum, ice plant, native grasses, wetland prairie species, delosperma, non-native wildflowers and grasses, yarrow, ornamental grasses, ornamental shrubs, vines, native evergreen and deciduous shrubs, herbaceous perennials and endangered native species (Hauth, 2004).

Many of those plants would not be appropriate for Los Angeles, but we see some of the same plants used in successful California projects. Two California projects in particular offer some insight into appropriate plant species. One is the green roof at the Premier Automotive Group headquarters in Irvine (Figure IV-2). That roof is planted with Sedum, Echeveria, Lampranthus, Delosperma, Agave, and Aloe (Roofscapes Inc., 2004). The other is the GAP green roof in San Bruno, which is planted with native grasses and wildflowers (Figure IV-3) (GRAE, 2003). There is clearly some overlap between the plant species from Portland area green roofs and those being used successfully in California. Sedums, native grasses, and delosperma appear to be generally successful in the green roof environment. Native species are particularly appealing for green roofs. These plants are appropriate for the climate and require little maintenance. They also offer habitat for native species of birds and insects. For example, one California native plant species that is a promising candidate for a green roof is the Chalk Dudleya (Figure IV-4). In addition to having a low water requirement, this species is known to attract hummingbirds, which may be viewed as a desirable attribute in some applications (SC HGG, 2004).



**Figure IV-2.** Green Roof of Premier Automotive Group in Irvine, CA.  
Source: Roofscapes Inc., 2004



**Figure IV-3.** Green Roof of GAP Inc. in San Bruno, CA.  
Source: Garmhausen, 2004



**Figure IV-4.** Chalk Dudleya  
Source: SC HGG, 2004

Most landscape architects who are familiar with the Southern California climate should have a good understanding of what plants will best meet the characteristics listed at the beginning of this section. Those that have an understanding of the specific challenges of a green roof would be best prepared to offer guidance on plant selection. Examples of sun tolerant plant species with low water requirements are listed in Table IV-2. Some of these species may be appropriate for a green roof in Los Angeles, but a qualified landscape architect should be consulted for a more definitive list.

**Table IV-2.** Sun and drought tolerant plant species potentially suitable for green roof applications in the Los Angeles area.

Common Name	Scientific Name	Notes
Gold Tooth Aloe	( <i>Aloe nobilis</i> )	
Golden Barrel Cactus	( <i>Echinocactus grusonii</i> )	
Many species of agave		
Hasse's Dudleya	( <i>Dudleya hassei</i> )	
Beavertail Prickly Pear	( <i>Opuntia basilaris</i> )	
Blue-blad Cactus	( <i>Opuntia violacea santa-rita</i> )	
Chalk Dudleya	( <i>Dudleya Pulverulenta</i> )	Figure IV-4
Felt Plant	( <i>Kalanchoe beharensis</i> )	
Ice Plant	( <i>Delosperma cooperii</i> )	Figure IV-5
Lampranthus	( <i>Lampranthus productus</i> )	
October Daphne	( <i>Sedum sieboldii</i> )	Figure IV-6
Oscularia	( <i>Lampranthus deltoides</i> )	
Purple Stonecrop	( <i>sedum spathulifolium</i> )	Figure IV-7
White Trailing Ice Plant	( <i>Delosperma Alba</i> )	
Brown Sedge	( <i>Carex testacea</i> )	Figure IV-8
Deer Grass	( <i>Muhlenbergia rigens</i> )	
Tussock Sedge	( <i>Carex stricta</i> )	

**Figure IV-5.** Ice Plant



Source: SC HGG, 2004

**Figure IV-6.** October Daphne



Source: SC HGG, 2004

**Figure IV-7.** Purple Stonecrop



Source: SC HGG, 2004

**Figure IV-8.** Brown Sedge



Source: SC HGG, 2004



## **IRRIGATION**

Irrigation will be required during the establishment phase of plant development and during dry periods. In wetter climates, it has been possible to limit irrigation to just the establishment phase (Peck et al, 2001). However, it would be unreasonable to expect even fully developed plants to survive the long dry periods characteristic of the Los Angeles area without irrigation. The average monthly precipitation in Los Angeles drops below one inch from May through October (WRCC, 2004). In Portland, average monthly precipitation only drops below one inch in July and August. Yet even in Portland, most green roof owners report irrigating the roof during drier months (Hauth, 2004). In most cases, green roof developers in Los Angeles will seek to minimize water use through appropriate plant selection and use of efficient irrigation techniques.

### **Methods**

There are many different irrigation techniques. The roof may be watered by hand, by a manually operated sprinkler system, or by an automated irrigation system (BES, 2004). Clearly an automated irrigation system will have a greater upfront cost, whereas the manual systems will involve greater annual labor expenditures. Many Portland green roofs use manual watering (Hauth, 2004) but roofs there typically only need to be watered perhaps two or three times per week for two months of the year. A green roof in Los Angeles will likely require more frequent watering and will certainly require watering for more months out of the year. The roof at the Premier Automotive Group headquarters in Irvine actually features two irrigation systems. The first, an automated sprinkler system was used only during the establishment period. The second, an automated drip irrigation system is now used on a regular watering schedule. Drip irrigation is generally more efficient because less water is lost to evaporation but the more uniform coverage provided by sprinkler systems may be preferred for some plantings. A landscape professional should be consulted to determine the optimal sprinkler system design for each specific installation.

Given the comparatively high water needs of a green roof in Los Angeles, an automated drip irrigation system will generally be most appropriate. A drip irrigation system typically delivers 90 percent or more of the water it uses to plants. In contrast, a sprinkler system delivers only 75 – 85 percent due to over-spray and direct evaporation (Stryker, 2001). An automated system also offers a higher efficiency due to the more exact calculation of total water delivery that it offers. An automated drip irrigation system may entail a higher initial cost, but savings in water consumption and labor generally make it a more economically efficient choice in the long term, and it's certainly the most environmentally friendly option. An assumed efficiency of 90 percent (reflective of drip irrigation) was used to calculate the annual water usage of 0.90 cubic feet per square foot (270 liters per square meter) of roof (\$0.020 per square foot or \$0.22 per square meter) presented in Section III. If an efficiency of 80 percent is used instead (reflective of a sprinkler system), the water use rises to 1.0 cubic feet per square foot (300 liters per cubic meter) of roof (\$0.022 per square foot or \$0.24 per square meter). That's a cost increase

of about 10 percent or about \$20 per year for a 10,000 square foot (930 square meters) roof.

### **Alternative Sources of Water**

Even greater water efficiency can be achieved if captured rainwater or gray water can be used for irrigation. As mentioned in the discussion of the growth medium, drainage from the roof can be directed to a cistern rather than to the City's stormwater drainage system. A green roof can capture between 10 and 100 percent of incidental rainfall (BES, 2004). Adopting the midpoint of those values (55 percent), under the average annual precipitation in Los Angeles of about 15 inches (38 cm) (WRCC 2004), a 10,000 square foot (930 square meters) green roof would yield 6,250 cubic feet (177,000 liters) of runoff annually. If all of that were captured, it would supply 70 percent of the estimated annual water needs of the roof.

Yet another water efficient option would be to use gray water to irrigate the green roof. Gray water is wastewater that has not come in contact with toilet waste. Gray water is widely used for landscape irrigation in California. Gray water use requires that a building have two independent wastewater systems: one for disposal of human waste and the other for all other uses. As the majority of existing buildings have only one combined wastewater disposal system, it will generally not be cost effective to implement a gray water system in an existing building. However, such systems are quite feasible when included in designs for new construction and can be an important element of a total water conservation program. A gray water irrigation system was implemented in the construction of the Premier Automotive Group headquarters and supplies all of the landscape irrigation needs, including irrigation of the green roof (US GBC, 2003). Implementation of such a system requires a permit from the City of Los Angeles Department of Building and Safety. California Administrative Code, Title 24, Part 5 details the California gray water Standards. This and more information on California gray water use can be found through the California Department of Water Resources website ([www.dwr.water.ca.gov](http://www.dwr.water.ca.gov)).

## V. GROWING AND MAINTAINING THE GREEN ROOF

There are two distinct phases in the maintenance of a green roof: establishment and continued care. Establishment begins with the installation of the green roof and ends when plants are mature (usually about 2 years). Continued care is the routine maintenance that must be performed over the life of the green roof after plants are established. Two important questions to consider in the installation of a green roof are when it will be installed and what method of plant installation will be used. These choices will have a large impact on the intensity of maintenance that is required during the establishment period of the green roof.

### INSTALLATION AND ESTABLISHMENT

There are several different methods for installing plants on a green roof. Plants can be installed in vegetation mats, in vegetation boxes, as plugs or potted plants, or as seeds or sprigs. Some of the advantages and disadvantages of each of these methods are presented in Table V-1.

**Table V-1.** Planting Methods for Green Roofs.

Method	Description	Advantages	Disadvantages
Vegetation mats	Similar to sod, pre-germinated mats or grids of plants are laid	-Erosion control -Minimal weed problems -Less watering required than other methods	-Less design flexibility
Vegetation boxes	Pre-planted recycled plastic containers	-Movable -Lightweight -Built in stormwater retention	-Less design flexibility
Plugs or potted plants	Pre-germinated plants are planted individually	-Design freedom -Less care required than with sprigs or seeds	-Need more watering than mats -Need erosion protection -Need weeding and mulching
Sprigs or seeds	Sprigs and seeds can be hand broadcast or seeds can be hydraseeded	-Design freedom -Ease of installation	-Need more watering -Need erosion protection -Need mulching

Source: BES, 2004

As shown in Table V-1, using plugs, potted plants, sprigs or seeds in the installation results in heightened maintenance during the establishment period. The intensity of the

additional maintenance will also depend upon what time of year the green roof is installed. Installing the plants in the summer requires relatively heavy irrigation as compared to installing the plants in the fall (Peck et al, 2001). Though installing the plants in the fall generally makes them vulnerable to cold weather conditions, this is much less of a concern in the relatively mild winters of the South Coast, as compared to other locations. A landscape architect, or other horticultural expert, can determine the most appropriate time for planting.

Before the green roof plant species achieve a high coverage of the roof area, the green roof will be vulnerable to dehydration and intrusion by weeds. The maintenance plan for the City of Chicago's green roof (<http://www.ci.chi.il.us/Environment/rooftopgarden/maintenanceplan.pdf>) provides for 3 weeding and watering activities per week during the establishment phase (City of Chicago, 2001d). This plan offers a good example of planning for the care of an extensive green roof. Some sections of this plan describe care for segments of the Chicago roof covered by an intensive type garden; care requirements for an intensive green roof include elements that are not necessary for an extensive green roof.

## **MAINTENANCE**

The maintenance requirements of a green roof decrease substantially after the plants are established. Simple extensive green roofs in a climate offering rooftop conditions similar to those of the plants' native habitat may require as few as two or three inspections per year to check for weeds or damage. At the other end of the spectrum, an intensive green roof could require one or more maintenance activities per week (Peck et al, 2001). The Chicago City Hall maintenance plan provides for a biweekly monitoring program for continued care (City of Chicago, 2001d). Some of the maintenance activities that may need to be performed over the life of the green roof are:

- Inspect overflow drains to make sure they are clear (approx. monthly)
- Check the health and coverage of the vegetation; remove and replace as needed (approx. monthly)
- Weeding (a few times per year to monthly)
- Mulching (not at all to monthly)
- Inspect the waterproof membrane (annually)
- Pest control (when problems are detected)  
(City of Chicago, 2001d; BES, 2004).

Certainly one of the most critical aspects of continued green roof care will be irrigation. Until the water requirements of the green roof are well understood, it will probably be necessary to perform frequent inspections to determine if the plants are receiving just the right amount of water. It is a good idea to routinely monitor weather conditions and adjust the watering schedule accordingly. This can be easily accomplished by using the watering index for Southern California available through the Be Water Wise website ([www.bewaterwise.com](http://www.bewaterwise.com)). The watering index, updated weekly, is designed to help gardeners and landscape maintenance professionals estimate optimal irrigation needs.

Once the maximum irrigation requirement for the green roof is determined,<sup>1</sup> the watering index can be used to determine what fraction of that maximum requirement is necessary throughout the year. Modern electronic automatic sprinkler controllers include a watering index adjustment feature which makes implementing the weekly adjustments very easy.

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<sup>1</sup> The maximum irrigation requirement is the irrigation needed on a typical hot, dry summer day. An estimate of that requirement can be made using the watering calculator on the Be Water Wise website or by other means. However, a true understanding of the green roof's maximum irrigation requirement will require some initial monitoring.

## VI. QUANTIFYING BENEFITS

As discussed in Section II, green roofs offer a wide range of potential environmental, economic, and social benefits. Since green roofs are still a relatively new concept in the Los Angeles area, any new projects are likely to generate interest in measuring these benefits for purposes of demonstrating the advantages of the green roof concept. Convincing, quantitative demonstrations of green roof benefits would go a long way towards promoting wider acceptance among developers and building owners and generating opportunities for additional funding sources and incentive programs. Demonstrations of green roof benefits would generate favorable publicity and promote public awareness and acceptance of green roofs. Results of benefit monitoring could also be used to optimize green roof design for the unique characteristics of the Los Angeles environment.

Some of the green roof benefits described in Section II, such as storm water runoff reduction and near roof temperature reduction, are much more amenable to quantification than others (e.g., aesthetics). Air quality benefits are quantifiable in theory but this is difficult to do in practice because of differences in scale between a single demonstration roof and the entire urban atmosphere. Numerical modeling tools have been used to estimate the air quality benefits of large scale cooling (such as might be associated with the eventual widespread adoption of green roofs) but these results are subject to considerable uncertainty (see Stoeckenius et al., 2001 for a more complete discussion). Even in the case of the more easily evaluated benefits, however, designing a valid controlled experiment is very difficult. For example, even a simple study such as the comparison of near roof temperature at the Chicago City Hall green roof with that at a nearby building presents challenges: there are differences in the shading received by the buildings, in the orientation of the roofs to the sun and in other building characteristics which confound the temperature comparison.

It is strongly recommended that green roof developers interested in a benefit quantification study partner with an experienced research group conversant with experimental design and potential confounding factors. Collaboration with an established research group also opens up the possibility of tapping into alternative funding sources for the benefits analysis. Some groups that have experience in the design of green roof experiments are:

- Lawrence Berkeley National Laboratory, Heat Island Group (<http://eetd.lbl.gov/HeatIsland/CoolRoofs/>) – Though not specifically involved in green roof research, the Heat Island Group has performed extensive studies of cool roofing materials and the effect of cool roofing materials and vegetation on the urban climate and energy consumption.
- Michigan State University Vegetative Greenroof Research Program (<http://www.hrt.msu.edu/greenroof>) – The green roof research conducted at MSU includes evaluating the performance of different plant species in the green roof environment and evaluating the stormwater management of green roofs.

- Pennsylvania State University Center for Green Roof Research (<http://hortweb.cas.psu.edu/research/greenroofcenter/index.html>) – The Center has researched plant growth and spread on green roofs, the performance of different beds and green roof runoff
- Portland State University ([http://www.sustain.pdx.edu/hm\\_feature\\_ecoroofs.php](http://www.sustain.pdx.edu/hm_feature_ecoroofs.php)) – PSU is engaged in experiments at two buildings in Portland: the Multnomah County Building and the Broadway building.
- British Columbia Institute of Technology Green Roof Research Facility (<http://www.greenroof.bcit.ca/>) - This facility is host to studies on green roof stormwater management, energy efficiency, species selection, maintenance programs, and the transfer of green roof technologies.

One motivation for studying the performance of a green roof is to increase the likelihood of obtaining funding for future projects. The current funding opportunities for green roofs rely almost entirely upon the well-demonstrated runoff reduction capacity of a green roof. Other funding could be made available if benefits, such as energy savings, were demonstrated.

Even a public demonstration project that is not sufficiently rigorous to withstand the scrutiny of a full scientific peer review process (i.e. that is lacking control of all external variables, rigorous quality of control, or is not sufficiently documented to be entirely verifiable or replicable) would still have value for promoting green roof technology and raising awareness of the environmental challenges that green roofs seek to address. The value of monitoring a green roof project may be as much in what it tells the public about the urban environment as in the quantitative information it offers on green roof effects.

## VII. ADDITIONAL RESOURCES

### CITY OF LOS ANGELES CONTACTS

#### Environmental Affairs Department

Applicable Services: The Environmental Affairs Department chairs the City's Green Roof Task Force, prepared this report, and continues to offer guidance on the implementation of green roofs in the City of Los Angeles.

CONTACT: Environmental Affairs Department  
Air Quality Division  
213-978-0851

#### Department of Public Works – Bureau of Engineering

Applicable Services: The Bureau of Engineering plans, designs and manages construction of municipal buildings; reviews plans and specifications prepared by private engineers and architects for public facilities; prepares structural, electrical, and mechanical engineering details; and prepares preliminary and final construction cost estimates. Its responsibilities include engineering features and standards for all privately developed subdivisions and tracts, sustainable design evaluation, structural analysis, environmental compliance, and research into geology and soil conditions. It also develops standard design plans, and distributes them to the private sector for continuity.

CONTACT: Department of Public Works  
Bureau of Engineering  
Architectural Division  
213-485-4389

#### Department of Public Works – Bureau of Sanitation

Applicable Services: This department provides information about the City of Los Angeles stormwater management activities and the City's runoff charges.

CONTACT: Bureau of Sanitation  
Watershed Protection Division  
Public Counter  
213-485-3951

#### Department of Building and Safety

Applicable Services: The Department of Building and Safety reviews construction specifications and issue building permits. This department can also offer guidance on what structures and uses are permissible. There is a fee for the construction plan check.

CONTACT: Structural Plan Check  
213-482-7307  
888-LA4-BUILD

#### City Planning Department

Applicable Services: This department verifies whether the project falls under an existing specific plan, ordinance, any new entitlement actions, or design guidelines such as those



listed in the Northeast Los Angeles Community Plan, the Canoga Park Community Design Overlay, etc.

CONTACT: Community Planning  
213-978-1164

#### General Services Department

Applicable Services: The Department of General Services tests the City's building construction materials; constructs and maintains City-owned buildings; and provides custodial services for City facilities.

CONTACT: Construction Forces Division  
213-978-2600

#### Department of Water and Power

Applicable Services: This department provides information on energy efficiency and water conservation programs, regulations governing the use of graywater in the City of Los Angeles, and general characteristics of graywater systems.

CONTACT: Department of Water and Power  
Energy Efficiency Programs  
800-DIAL-DWP (800-3425-397)

Graywater Use  
213-367-1138

Water Conservation  
888-544-4498

#### Fire Department

Applicable Services: The Fire Department reviews and approves construction plans for fire and life hazards such as adequate emergency access, structural protection, etc.

CONTACT: Fire Department  
Construction Services Unit  
213-482-6900

### **GREEN ROOF ORGANIZATIONS**

The following organizations promote green roofs and other green building practices:

EcoRoofs Everywhere

<http://www.ecoroofofseverywhere.org>

This organization provides information (photos, specifications, cost, etc.) on Portland area green roofs projects and is actively involved in community green roof construction projects.

Greening Gotham

[www.greeninggotham.org](http://www.greeninggotham.org)

New York City's online green roof resource was created with support from the United States Environmental Protection Agency. It focuses on raising public awareness and support for green roof development. GreenRoofs.com

Green Roofs

[www.greenroofs.com](http://www.greenroofs.com)

This website offers descriptions of many current green roof projects, links to green roof research, and a directory of green roof contractors.

Green Roofs for Healthy Cities

[www.greenroofs.org](http://www.greenroofs.org)

This network of public and private organizations works to promote the spread of green roofs through research, education, and lobbying.

Northwest Ecobuilding Guild

<http://www.ecobuilding.org/proj/ecorooft/index.html>

Information on green roof projects in the Northwest and links to green roof suppliers.

U.S. Green Building Council

[www.usgbc.org](http://www.usgbc.org)

The U.S. Green Building Council administers the Leadership in Energy and Environmental Design (LEED) program and offers some technical guidance on green building.

## **RESEARCH GROUPS**

British Columbia Institute of Technology – Green Roof Research Facility

<http://www.greenroof.bcit.ca/>

Forschungsgesellschaft Landschaftsentwicklung Landschaftsbau e.V.

Research Association for Landscape Development and Landscape Construction

<http://www.f-l-l.de/>

(in German)

Lawrence Berkeley National Laboratory – Heat Island Group

<http://eetd.lbl.gov/HeatIsland/CoolRoofs/>

Michigan State University – Vegetative Greenroof Research Program

<http://www.hrt.msu.edu/greenroof/index.htm>

National Research Council

Institute for Research in Construction

1200 Montreal Road, Building M20  
Ottawa, ON K1A 0R6

Pennsylvania State University – Center for Green Roof Research  
<http://hortweb.cas.psu.edu/research/greenroofcenter/index.html>

## **CITY/STATE GOVERNMENT GREEN ROOF PROGRAMS**

Some of the most useful guidance on implementing green roofs in the City of Los Angeles may come from the other cities that have recently initiated green roof programs. Summaries of the green roof programs in Portland, Chicago, Minneapolis – St. Paul and the State of Pennsylvania are provided below.

### **Portland, OR**

Currently the city of Portland, OR, is helping to lead the way in the U.S. with aggressive sustainable design measures which include promoting green roofs. In July, 2002, the City of Portland's Office of Sustainable Development (OSD) introduced "Portland LEED," the first U.S. Green Building Council approved local supplement to the USGBC Leadership in Energy and Environmental Design rating system.

Two measures are in place in Portland to make green eco-roof construction easier on the wallet, and a third is being worked on. First, "All building projects in the city that will result in at least 500 square feet (46 square meters) of impervious surface are required to implement stormwater pollution reduction and flow control measures, and green roofs are one of the acceptable measures," (EBN, 2001).

Second, builders can now increase their floor area ratio (FAR) when they include a green eco-roof to cover a minimum of 60% of the roof surface. In March 2001, Portland created a FAR bonus, which grants an additional three square feet of floor area per square foot of green eco-roof to be added to the footprint of the building.

A further measure plans for Portland to reduce stormwater utility fees for buildings with green roofs by July 2006. The City's "Clean River Incentive and Discount Program" is aimed at green roofs atop commercial, industrial, institutional, multi-family, and single family residential properties. (Mann, 2003).

CONTACT: [http://www.cleanrivers-pdx.org/clean\\_rivers/ecorooft.htm](http://www.cleanrivers-pdx.org/clean_rivers/ecorooft.htm)  
Tom Liptan  
Bureau of Environmental Services  
503-823-7267  
[toml@bes.ci.portland.or.us](mailto:toml@bes.ci.portland.or.us)

## **Chicago, Illinois**

The Chicago Energy Conservation Ordinance went into effect on June 3, 2002 and includes a chapter from Chicago's Urban Heat Island Reduction Initiative identifying minimum ASTM standards of solar reflectance and emissivity. The ordinance requires all new and refurbished roofs to install green roofs or reflective roofing. The City allowed time for public awareness and offered workshops to developers, designers and other interested parties. The Ordinance is based on requirements from the International Energy Conservation Code (GRIM, 2002).

Density Bonuses - According to EPA Smart Growth Policy Information, "To create attractive commercial and business districts, the City of Chicago increases development square footage, known as floor area premiums, when such developments include public amenities. Public amenities include plazas, pocket parks, block connections, green roofs, transit improvements, and wider sidewalks among others" (EPA, 2004b). The Chicago Department of Zoning states, "A floor area premium shall be granted for a roof that is covered with plants that reduce the 'urban heat island' effect and storm-water runoff of buildings in the central business district. To qualify for a floor area premium, a minimum of 50 % of the roof area at the level of the green eco-roof or a minimum of 2000 square feet (whichever is greater) shall be covered by vegetation and shall meet..." certain standards.

CONTACT: Kevin M. Laberge  
City of Chicago  
Department of Environment  
30 N. LaSalle St. 25th Floor  
Chicago, Illinois 60602  
Tel: (312) 742-0463

## **Minneapolis–St. Paul, Minnesota**

The Metropolitan Council Environmental Services issued the "Minnesota Urban Small Sites BMP Manual" which includes a chapter on green roofs. The Metropolitan Council is the regional planning agency for the seven county Minneapolis-St. Paul metro area, and also operates the wastewater, transit, airport, and regional parks systems. The BMP manual is intended for the nonpoint source technical assistance program, and will be used by the 180 or so communities in the region. The chapter was prepared by Barr Engineering Company as one of 40 BMPs that the metro area is focusing on.

CONTACT: <http://www.metrocouncil.org/environment/Watershed/BMP/>  
Karen Jensen  
[Karen.Jensen@metc.state.mn.us](mailto:Karen.Jensen@metc.state.mn.us)  
(651) 602-1401

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## **OTHER USEFUL CONTACTS**

EPA Office of Water, Nonpoint Source Control Branch

<http://www.epa.gov/owow/nps/>

Robert Goo

202-566-1201

Knowledge of programs and policies used to support green roofs at the federal level.

EPA, Region 9, Pollution Prevention

[http://www.epa.gov/region09/cross\\_pr](http://www.epa.gov/region09/cross_pr)

Wendi Shafir, Pollution Prevention Coordinator

Phone: (415) 972-3422

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# Appendix A

## Landscape Watering Needs Worksheet

**Worksheet for Estimating Landscape Water Needs**

adapted from UCCE, 2000

**Step 1: Calculate the Landscape Coefficient (K<sub>L</sub>)**

$K_L = K_s \times K_d \times K_{mc}$

$K_s = 0.2$  Species Factor for Sedums; from Water Use Classification of Landscape Species (WUCLS in UCCE, 2000)

$K_d = 1$  Species density for full planting predominately of one species type; UCCE, 2000

$K_{mc} = 1.4$  Highest microclimate factor used to account for extreme rooftop conditions; UCCE, 2000

**$K_L = 0.28$**

**Step 2: Calculate Landscape Evapotranspiration (ET<sub>L</sub>)**

$ET_L = K_L \times ET_o$

Los Angeles Daily ET<sub>o</sub> by Month; UCCE, 2000 Appendix A

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
ET <sub>o</sub> =	0.06	0.08	0.11	0.16	0.18	0.21	0.21	0.2	0.16	0.12	0.08	0.06
inches												
ET <sub>L</sub> =	0.017	0.022	0.031	0.045	0.050	0.059	0.059	0.056	0.045	0.034	0.022	0.0168
inches												
days	31	29	31	30	31	30	31	31	30	31	30	31
Monthly ET <sub>L</sub>	0.521	0.650	0.955	1.344	1.562	1.764	1.823	1.736	1.344	1.042	0.672	0.5208
inches												

**Step 3: Calculate Net ET<sub>L</sub>**

$Net\ ET_L = ET_L - P \times (PE/100)$

P = Precipitation

PE = 50 Estimate of percentage of precipitation that is actually used by plants

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
P =	3.28	3.9	2.72	0.98	0.33	0.07	0.01	0.16	0.26	0.39	1.1	2.06
inches at LA												
Net ET <sub>L</sub> =	0.000	0.000	0.000	0.854	1.397	1.729	1.818	1.656	1.214	0.847	0.122	0.000

**Step 4: Calculate the Total Water to Apply (TWA)**

$TWA = ET_L / IE$

IE = 90% Estimated Irrigation Efficiency for a drip irrigation system

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Monthly TWA =	0.000	0.000	0.000	0.949	1.553	1.921	2.020	1.840	1.349	0.941	0.136	0.000
inches												

Annual TWA = 10.71 inches

Annual Volume = 1542 cubic inches of water per square foot

Cost of Water = \$2.20 per HCF; LA DWP, 2004

Annual Cost = \$0.020 per square foot of green roof

## Mark Perez

---

**From:** Bridgette Ramirez [REDACTED]  
**Sent:** Monday, May 3, 2021 6:37 PM  
**To:** City Clerk  
**Subject:** Public Hearing Item - 5/4/2021

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Regarding the public hearing for Item 13 on the agenda:

Every time I walk along Lark Ellen Avenue by my old high school, I walk past a conclave of multi-story manicured houses with potted plants and smooth driveways, cut off from the rest of the world by the black bars of a gate. I think to myself, "I could never afford to live there." The only reason I can live in West Covina at all is because I am living with my parents. Whenever I have dared to look at rental rates and home prices in West Covina, I despair.

When I look at the Walnut Grove Specific Plan for the property on East Rowland Avenue, I see another pristine gated community in West Covina's future. One that average people like me could never conceive of affording or living in. The company that is applying to build 158 single and multifamily units has offered a homeownership assistance program, but I see several gaps in a halfhearted attempt to make these future homes affordable.

Out of 158 units, only a minimum of 15 homes would benefit from the homeownership assistance program - that's less than 10%. I won't even get into the paltry sum of \$150,000 for the entire program compared to the median home value of \$647,000 in West Covina. Additionally, the program will be available to first-time homebuyers with preference provided to existing West Covina residents and/or low- or moderate-income individuals/families. That "and/or" is key here. Low and moderate-income people should be the priority, not the afterthought. At least if West Covina is committed to being accessible and affordable.

I am excited at the prospect of having more housing available in West Covina. I hope, however, that the City Council will thoroughly investigate how to make sure to prioritize low- and moderate-income community members throughout the city and local area, not just the neighbors in the immediate zone area.

Also, I appreciate that there has been a study about the environmental impact. I think the applicant building these homes should consider how to keep green building in mind as they plan and construct the units. How can we go out of our way to be environmentally conscious in what and how we're building?

These are just a few things to consider as you move forward. Thank you for your time.

Bridgette Ramirez  
West Covina Resident

## Mark Perez

---

**From:** Danny Garcia [REDACTED]  
**Sent:** Tuesday, May 4, 2021 3:59 PM  
**To:** City Clerk  
**Subject:** Walnut Groove Residential Project

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Attn:  
Major Letty Lopez-Viado  
West Covina City Council

I'm writing to inform you of my disapproval of the Walnut Groove Residential Project. I have read the complete proposal on the city website and it is clear that the scope and size of the project is too large for the lot of land formerly occupied by Pioneer school. I respectfully ask that you turn down the passing of this project and ask the planning commission to work with residents to proposed another project that is more appropriate for the lot and is agreeable with the surrounding community. I trust that you will carefully consider the information that has been presented to you by the community before making a ruling on the project. I'm confident that you too will see for yourself that a project of this size and at that specific location is not acceptable for the community and the City of West Covina. I'm pleased to learn that Major Letty Lopez-Viado is also a long time resident of District 2 and has an interest in the neighborhoods that would be impacted should this project be allowed to proceed.

Thank you for your sincere consideration and providing the opportunity to write to you directly on this urgent matter.

Kind Regards,  
Cynthia Garcia

Sent from [Mail](#) for Windows 10