

Communication from Public

Name: Carol Teutsch

Date Submitted: 09/16/2019 08:17 AM

Council File No: 13-1339

Comments for Public Posting: I am writing to support the addition of the Mexican Elderberry (*Sambucus mexicana*) and the Toyon (*Heteromeles arbutifolia*) species to the Protected Tree Ordinance. Protecting these species is critical to helping us meet the challenges posed by climate change, deforestation and increased urbanization. Mount Washington has been a leading community protecting our natural environment. I believe that protecting these species is important to the Citizens of Los Angeles. It is critical that we protect these species, not only in name but in actual fact. Therefore, I urge you to adopt the measurement standard compromise adopted by our Community Forest Advisory Committee (CFAC) of a single trunk measuring 2 inches at 2.5 feet above the ground. These species are fire and drought adapted and many significant specimens present as multiple-trunked. Furthermore, as a result of the additional impacts caused by the City's brush clearance program, an even larger number present as multiple-trunked. As a result, I believe that the original proposal - to measure the trunks using a cumulative standard - is more appropriate. However, I believe the CFAC proposal is a good compromise. I urge you to act to protect these species NOW and to adopt the proposed CFAC standard of measurement. Development should respect the natural world.
Sincerely, Carol and Steven Teutsch

Communication from Public

Name: Erica Silverman
Date Submitted: 09/16/2019 11:33 AM
Council File No: 13-1339

Comments for Public Posting: I urge you to vote in support of the addition of the Mexican Elderberry (*Sambucus mexicana*) and the Toyon (*Heteromeles arbutifolia*) species to the Protected Tree Ordinance. Case: CPC-2016-4520-CA. Environmental: ENV-2016-4521-CE As we face climate change, deforestation, urban sprawl, and the rapid degradation of our region's biodiversity, we must recognize the vital importance of such seemingly small steps as this - the protection of two of our native species - steps that will result in significant, long-lasting benefits to our ecosystem, our wildlife and to all of us who call Los Angeles home. For this protection to be effective, we must set specific, carefully considered guidelines. This will be best accomplished by supporting the measurement standard of a single trunk measuring 2 inches at 2.5 feet above the ground - the compromise adopted by the Community Forest Advisory Committee (CFAC) Many of these specimens tend to be multi-trunked. More of them have become so because of the City's brush clearance program. In light of this, it makes more sense to use a cumulative measuring method. However, the CFAC proposal is an acceptable compromise. Please protect these species and adopt the proposed CFAC standard of measurement.

Communication from Public

Name: Ann Dorsey

Date Submitted: 09/15/2019 04:06 PM

Council File No: 13-1339

Comments for Public Posting: I fully support amending the ordinance provisions of Sections 12.21, 17.02, 17.05, 17.06, 46.01, and 46.02 of the Los Angeles Municipal Code (LAMC) in order to add the Mexican Elderberry (*Sambucus mexicana*) and Toyon (*Heteromeles arbutifolia*) to the list of "Protected Trees and Shrubs".

Communication from Public

Name: Lois Becker

Date Submitted: 09/16/2019 04:20 PM

Council File No: 13-1339

Comments for Public Posting: I am writing on behalf of Bel Air Skycrest Property Owners' Association (BASPOA) to express support for: 1) addition of the Mexican Elderberry and Toyon species to the City of Los Angeles Protected Tree and Shrub Ordinance 2) use of the cumulative diameter measurement of 4 inches at 4.5 feet above ground as the determining metric for protection As a residential association of the Mulholland Scenic Parkway/Santa Monica Mountains, Bel Air Skycrest Property Owners' Association (BASPOA) takes the preservation of native resources very seriously. Species like the Mexican Elderberry and Toyon are crucial links in a delicately balanced network of complex, highly interdependent life forms—everything from the smallest wildflower to the mightiest mountain lion—that are the jewels in our city's urban wildlands crown. We must do all that we can to help them survive the challenges posed by climate change and increased urbanization. Our quality of life; the scenic, recreational, and educational character of our city; and ultimately our very survival depend on it. The question of whether the Elderberry and Toyon are defined as trees or as shrubs seems to have given rise to a good deal of confusion and unfortunate wasting of time in the ordinance amendment process thus far. This "tree vs. shrub" problem is an artificially imposed distinction: our area's particular environmental conditions produce a number of species (including some already on the protected list) that may produce either a single or multiple trunks. That very "ambiguity" is in fact an important key to their adaptation and survival in drought and fire conditions and in no way diminishes the ecological value of the specimen. That is why the existing cumulative metric is so appropriate. In all the back-and-forth discussion, we have seen no compelling reason to change this existing metric for protected trees and no compelling reason to hold these two species to a different standard from the rest. In fact, there are compelling reasons NOT to do so as it will only weaken the ordinance and allow significant specimens to be swept away in the course of routine brush clearance. We therefore urge you to add the Mexican Elderberry and Toyon species to the City of Los Angeles Protected Tree and Shrub Ordinance and to protect the character and resiliency of these two species and of our wildlands in general. • REJECT the standard proposed by the Urban Forestry

Division • REJECT the compromise standard proposed by the
Community Forest Advisory Committee • SUPPORT continued
use of the cumulative diameter metric of 4 inches at 4.5 feet
above ground. If it ain't broke, don't fix it. Sincerely, Lois Becker
BASPOA Community Liaison LA 90049

BEL AIR SKYCREST Property Owners' Association

September 16, 2019

PLUM Committee
Councilmember/Chair Marqueece Harris-Dawson
Councilmember Bob Blumenfield
Councilmember Curren D. Price, Jr.
Councilmember Gilbert A. Cedillo
Councilmember John S. Lee
200 Spring St, L.A. 90012
LACouncilComment.com

RE: Council File No. 13-1339, Case No. CPC-2016-4520-CA

Support for addition of Mexican Elderberry and Toyon species to the City of Los Angeles Protected Tree and Shrub Ordinance and use of the *cumulative diameter metric of 4 inches at 4.5 feet above ground*

Dear PLUM Committee:

I am writing on behalf of Bel Air Skycrest Property Owners' Association (BASPOA) to express support for:

- 1) addition of the Mexican Elderberry and Toyon species to the City of Los Angeles Protected Tree and Shrub Ordinance
- 2) use of the *cumulative diameter measurement of 4 inches at 4.5 feet above ground* as the determining metric for protection

As a residential association of the Mulholland Scenic Parkway/Santa Monica Mountains, Bel Air Skycrest Property Owners' Association (BASPOA) takes the preservation of native resources very seriously. Species like the Mexican Elderberry and Toyon are crucial links in a delicately balanced network of complex, highly interdependent life forms—everything from the smallest wildflower to the mightiest mountain lion—that are the jewels in our city's urban wildlands crown. We must do all that we can to help them survive the challenges posed by climate change and increased urbanization. Our quality of life; the scenic, recreational, and educational character of our city; and ultimately our very survival depend on it.

The question of whether the Elderberry and Toyon are defined as trees or as shrubs seems to have given rise to a good deal of confusion and unfortunate wasting of time in the ordinance amendment process thus far. This “tree vs. shrub” problem is an artificially

imposed distinction: our area's particular environmental conditions produce a number of species (including some already on the protected list) that may produce either a single or multiple trunks. That very "ambiguity" is in fact an important key to their adaptation and survival in drought and fire conditions and in no way diminishes the ecological value of the specimen. That is why the existing cumulative metric is so appropriate. In all the back-and-forth discussion, we have seen no compelling reason to change this existing metric for protected trees and no compelling reason to hold these two species to a different standard from the rest. In fact, there are compelling reasons NOT to do so as it will only weaken the ordinance and allow significant specimens to be swept away in the course of routine brush clearance.

We therefore urge you to add the Mexican Elderberry and Toyon species to the City of Los Angeles Protected Tree and Shrub Ordinance and to protect the character and resiliency of these two species and of our wildlands in general.

- REJECT the standard proposed by the Urban Forestry Division
- REJECT the compromise standard proposed by the Community Forest Advisory Committee
- **SUPPORT continued use of the cumulative diameter metric of 4 inches at 4.5 feet above ground.**

If it ain't broke, don't fix it.

Sincerely,



Lois Becker
BASPOA Community Liaison
LA 90049

Communication from Public

Name: Citizens for Los Angeles Wildlife (CLAW)
Date Submitted: 09/16/2019 04:26 PM
Council File No: 13-1339
Comments for Public Posting: Org support if amended (letter attached)



CITIZENS FOR
LOS ANGELES
WILDLIFE

PO Box 50003 Studio City, CA 91614
805-225-5766 info@clawonline.org www.clawonline.org

September 16, 2019

Councilmember Marqueece Harris-Dawson, Chair
Planning & Land Use Management Committee (PLUM)
LA City Council c/o City Clerk
200 North Spring St, Room 395
Los Angeles, CA 90012

RE: **Support** Addition of Elderberry & Toyon (CF-13-1339) to the Protected Tree Ordinance **If Amended**

Honorable Councilmember Harris-Dawson and PLUM members:

Citizens for Los Angeles Wildlife (CLAW) is a non-profit advocacy environmental organization concerned with the well being of wildlife and wildlife open space habitat for the City of Los Angeles and beyond. A citizenry of more 3000 individuals now supports our organization's multiple calls for biodiverse practices and policy to benefit LA City, County, California and beyond. That is why we applaud the efforts of the Planning Department, city leaders, and thoughtful constituents to expand the protected tree ordinance to include Mexican elderberry and toyon. However, **we encourage leadership to amend the draft ordinance to either instate a 2 inch single stem measurement at 2.5 feet or apply the Ordinance's current cumulative measurement for multi-stemmed species.**

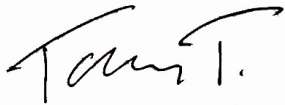
Native toyon and elderberry make a unique and significant contribution to land throughout LA City including the Santa Monica Mountains' composition of chaparral vegetation and woodlands. The intermediate height of both species fills in a vertical niche in chaparral ecosystems which benefits mammals and herptofauna with shade, and benefits birds with elevated perching and nesting sites. The berry fruits and seeds of both species are food for many birds and mammals. Because both species have higher moisture requirements than most chaparral species, their presence indicates a microsite with favorable soil, moisture, and aspect. Chaparral sub-communities that contain either of these two species have a higher wildlife habitat value per acre.

Protecting these trees among many other native flora benefits our wildlife, which, in turn, maintains the balance of the environment as a whole. The trees of Los Angeles are truly the lungs of our city, and they prove most valuable in these uncertain times of climate change measured by drought, mudslides, increasing human population, and building encroachment on disappearing wildlands. The protection of these trees will go a long way to the overall conservation of Los Angeles' diverse ecosystems.

While everyone can agree that protecting these trees is necessary, there has been some controversy as to the best methods to use in order to determine which specimens should be protected. The Planning Department's draft ordinance now suggests that specimens will be deemed protected if a single stem measures 2 inches in diameter when measured 4.5 feet off the ground. While this may be an industry standard for trees, it is important to remember that toyon and elderberry often grow in a more "shrublike" manner, with multiple stems that are an intermediate height when compared to other protected trees such as oaks and sycamores. This difference in stature means that measurements for toyon and elderberry should be made lower, at 2.5 feet off the ground. We cannot take a one-size-fits-all approach to such a great variety of flora, and adapting this measurement change for shrubs ensures that specimens are properly protected. If 2.5 feet is not feasible, then a cumulative approach should be taken with toyon and elderberry, as it is with the protected black walnut, with protected specimens having at least 4 inches of cumulative diameter at a measurement of 4.5 feet.

So, while there has been some short-term controversy over which method to implement, we must remember that this is a long-term decision that will have a critical and permanent impact on the future of the natural landscape of Los Angeles. Opportunities to make such a lasting change don't come along often, and we must seize this moment and take the most aggressive path that will protect our trees most effectively for future generations. Such an approach is always in the best interest of the public, as a healthy environment is something that benefits every single resident in Los Angeles.

Sincerely,

A handwritten signature in black ink, appearing to read "Tony T.", with a stylized flourish extending from the end of the name.

Tony Tucci
Chair

Communication from Public

Name: laura howe

Date Submitted: 09/16/2019 04:56 PM

Council File No: 13-1339

Comments for Public Posting: To Planning and Plum Committee, I am writing in support of greater protection of Los Angeles native trees. It is essential and vital that the city and state do more to protect trees and grow trees as mitigation to the large up surge of development in the area. We are losing a devastating amount of trees due to drought and bark beetles. That coupled with on going housing development make it so important for the city to do more to protect trees. I urge you as a business owner, volunteer, and citizen of Los Angeles to pass this ordinance: Case No. CPC-2016-4520-CA and Council File No. 13-1339. Thank you Sincerely, Laura Howe Volunteer Coordinator Friends of Griffith Park

Communication from Public

Name:

Date Submitted: 09/16/2019 06:40 PM

Council File No: 13-1339

Comments for Public Posting: Please see attached letter of support for CF 13-1339 from Grown in LA.



1000 N. Alameda St. Suite 240 Los Angeles, CA 90012
p 248.890.6409
www.growninla.org

September 16, 2019

Planning and Land Use Management Committee
Public Works and Gang Reduction Committee
City Council

RE: CF 13-1339 Protected Tree Ordinance Amendment to add Mexican Elderberry and Toyon – Support

Dear Honorable Councilmembers,

Grown in LA (GiLA) is working towards transforming the urban landscape by growing and supplying locally-grown climate-appropriate plants to public green infrastructure projects (such as the Los Angeles River revitalization). Toyon (*Heteromeles arbutifolia*) and Elderberry (*Sambucus mexicana*) are two such species of plants that we grow, plant, and encourage in the landscape. These two species are remarkably drought-adapted, are superior air purifiers in our polluted urban environment, and provide immense habitat benefit to our local wildlife.

We fully support the addition of these two species to the Protected Tree Ordinance at the measurement of a single 2" stem at DBH. We are losing so many of our essential native trees to climatic pressures, invasive pests, and urban development. Unless we do something to protect our trees, the quality of life for the remaining humans and animals living in Los Angeles will continue to decline.

Respectfully,

A handwritten signature in black ink, appearing to read "Kat Superfisky". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

.kat.superfisky.
Executive Director | Grown in LA | 248.890.6409 (c) | kat.superfisky@growninla.org

A handwritten signature in black ink, appearing to read "Katherine Pakradouni". The signature is cursive and somewhat stylized, with a long horizontal stroke extending to the right.

.katherine.pakradouni
Propagation Specialist | Grown in LA | 323.376.2549 (c) | katherine.pakradouni@growninla.org

**PLANT SEEDS.
POWER PEOPLE.
TRANSFORM A RIVER.**

Communication from Public

Name: John Given

Date Submitted: 09/16/2019 10:54 PM

Council File No: 13-1339

Comments for Public Posting: Honorable Councilmembers - Attached please find a public comment letter from the Federation of Hillside and Canyon Associations, Inc. regarding the proposed amendment to the City's Protected Tree Ordinance. Sincerely, John Given Vice President Federation of Hillside and Canyon Associations, Inc.



PRESIDENT
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Mark Stratton
John Given
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Don Andres

September 17, 2019

VIA EMAIL AND ONLINE SUBMISSION

Planning and Land Use Management Committee
Los Angeles City Council
200 N. Spring Street
Los Angeles, CA 90012

Re: **Protected Tree Ordinance**
CPC-2016-4520-CA / City Council File 13-1339
PLUM Sept. 17, 2019 agenda item #8

Argyle Civic Assn.
Beachwood Canyon NA
Bel-Air Assn.
Bel-Air Hills Assn.
Bel Air Knolls Property Owners
Bel Air Skycrest Property Owners
Benedict Canyon Association
Brentwood Hills Homeowners
Brentwood Residents Coalition
Cahuenga Pass Property Owners
Canyon Back Alliance
Crests Neighborhood Assn.
Doheny-Sunset Plaza NA
Franklin Ave./Hollywood Bl. West
Franklin Hills Residents Assn.
Highlands Owners Assn.
Hollywood Dell Civic Assn.
Hollywood Heights Assn.
Holmby Hills Homeowners Assn.
Kagel Canyon Civic Assn.
Lake Hollywood HOA
Laurel Canyon Assn.
LFIA (Los Feliz)
Mt. Olympus Property Owners
Mt. Washington Homeowners All.
Nichols Canyon NA
N. Beverly Dr./Franklin Canyon
Oak Forest Canyon HOA
Oaks Homeowners Assn.
Outpost Estates HOA
Residents of Beverly Glen
Save Coldwater Canyon!
Shadow Hills POA
Sherman Oaks HOA
Silver Lake Heritage Trust
Studio City Residents Assn.
Sunset Hills HOA
Tarzana POA
Torreyson Flynn Assn.
Upper Mandeville Canyon Assn.
Upper Nichols Canyon NA

Honorable Chairperson Harris-Dawson and Committee Members:

The Federation of Hillside and Canyon Associations was founded in 1952 and represents 42 resident and homeowners associations spanning the Santa Monica Mountains. The Federation previously submitted letters to the record in general support of the proposed amendments to the Protected Tree Ordinance (“PTO”) to add the Toyon and Mexican Elderberry as protected species.

We write today to specify that the criteria for these species to receive protection under the PTO should be a 4-inch cumulative measurement taken at a height of 4 feet 6 inches, and *not* the measurement criteria recommended in the staff report. Use of the staff proposed measurement criteria is grossly insufficient to protect the special habitat and historic / cultural value of these native species, because it would include far too few individual plants under the amended PTO.

We urge the PLUM committee to adopt the ordinance with an amended measurement criteria making a 4 inch cumulative measurement at 4 feet 6 inches height.

Sincerely,

Charley Mims, President

CHAIRS EMERITI
Shirley Cohen
Jerome C. Daniel
Patricia Bell Hearst
Alan Kishbaugh
Steve Twining
CHAIRS IN MEMORIAM
Brian Moore
Gordon Murley
Polly Ward