



CITIZENS FOR
LOS ANGELES
WILDLIFE

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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 at the end.

Tony Tucci
Chair