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Upper Mandeville Canyon Assn. Upper Nichols Canyon NA 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

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