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Public Works and Gang Reduction Committee
Los Angeles City Council
200 N. Spring Street
Los Angeles, CA 90012

November 30, 2020

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.
Dixie Canyon Assn.
Doheny-Sunset Plaza NA
Franklin /Hollywood West Residents
Franklin Hills Residents Assn.
Highlands Owners Assn.
Hollywood Dell Civic Assn.
Hollywood Heights Assn.
Hollywoodland HOA
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
Pacific Palisades Res. Assn.
Residents of Beverly Glen
Save Coldwater Canyon!
Save Our 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
Whitley Heights Civic Assn.

Re: **CF 13-1339 Protected Tree Ordinance Amendment
Mexican Elderberry/Toyon/Adding to Protected Tree List
PW&GR Committee, December 2, 2020, Agenda Item 2**

Honorable Chairperson Blumenfield and Committee Members:

The Federation of Hillside and Canyon Associations, Inc., founded in 1952, represents 46 homeowner and resident associations with approximately 250,000 constituents spanning the Santa Monica Mountains. We previously submitted letters to the record in support of protecting these native species, and in September, 2019, urged the PLUM Committee to reject the qualifying measurement standard recommended in the May 3, 2019, DCP Staff Report and amend it to a 4-inch *cumulative* diameter measurement taken at 4 1/2 feet high, consistent with the existing measurement standard for the other species in the Ordinance.

In response to the October 14, 2020, Joint Report by the Office of Forest Management and Bureau of Street Services, we write again to urge you to correct the measurement standard as above. This *cumulative* measurement is backed by the Community Forest Advisory Committee (CFAC), Tree People, the Santa Monica Mountains Conservancy, Friends of Griffith Park, Citizens for Los Angeles Wildlife, and highly qualified biologists and ecologists with expertise in the ecosystems of the Santa Monica Mountains. Efforts by City staff to insert a different measurement standard for the new species arose late in this amendment's seven-year process, without rationale, and will severely limit the number of trees qualifying for protection.

Additionally, we support the allied recommendations of the Community Forest Advisory Committee in their November 16, 2020, letter to your Committee:

- Developers should be made aware of an expectation that projects shall be designed so as to retain as much native vegetation as possible. If, as a last resort, off-site or out-of-kind replacements must be considered, they should require the approval of the Board of Public Works at a public hearing, not be determined on the fly by a “designee.”
- Dedicated staff should be approved to implement the administration and enforcement of the Protected Tree Ordinance. Those staff should form a separate unit composed of specialists such as a biologist/ecologist, an arborist, and an architect and be located not in the Urban Forestry Division but in a relevant environmental office such as LASan.
- Fees should be reviewed and updated to achieve full cost recovery and fund the staff needed to implement the program administratively and in the field.

Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script that reads "Charley Mims". The signature is written in black ink and is positioned above the printed name.

Charley Mims