



May 17, 2021

TO: the City of Los Angeles Planning and Land Use Committee

RE: Vista El Sereno; CF 21-0174, (APCE-2015-2048-ZC-ZAD-ZAA, ENV-2015-1918-MND), CD 14

Dear Council Members of the PLUM Committee,

The Community Forest Advisory Committee (CFAC) is dedicated to working towards a healthy and robust tree canopy for the City of Los Angeles. We also honor and work to support the Mayor's Green New Deal wildlife and Biodiversity goals. As appointed members from each Council District, our role includes advising City Council on tree-related policies and helping to develop programs which protect and expand the City's urban forest for the health and wellbeing of all Angelenos.

While we appreciate some efforts by the project developers to reduce the number of protected and non-protected trees to be removed, and plant so called "replacements," there is no way to replace the ecosystem that would be destroyed through grading and construction. Because of its proposed removal of nearly 100 trees, including 39 rare and nearly endangered *Juglans californica*, California black walnut, and the resulting impacts on the walnut woodland ecosystem, we do not support this project as proposed.

We would like to draw your attention to the many opposition letters submitted (Exhibit F of the [Case Documents](#), including one from CFAC July 7th, 2016. We support the many local residents and the LA-32 Historic Neighborhood Council sentiments regarding impacts on aesthetics, air quality, noise, biological resources, public services, and traffic. (E.g.: "the hillsides of El Sereno are a cultural treasure and a scenic resource," "the loss of this particular hillside will degrade the geographic identity of our community," "the construction activity related to this project will degrade the air quality for the surrounding community," "construction related activity would affect access to public facilities, particularly during school and park peak hours," construction activity will "unnecessarily impede the flow of traffic and adversely affect traffic patterns for our community.")

We also disagree with the findings of the MND:

1. The property is incorrectly described as urban infill. Section 32 of CEQA grants MNDs in cases of infill because the designation is assumed to be synonymous with limited environmental impact. However, this property is a rare five acres of contiguous woodland habitat that has been undeveloped for generations. As such, it is a critical and rare functioning ecosystem supporting numerous species of mammals, birds, insects, plants and microbes. If approved as submitted, the removal of 39 protected and 59 non-protected trees as well as the associated grading would in fact have a very significant environmental impact.

2. Compliance with the City's Native Protected Tree Ordinance is insufficient. The City's Native tree protection ordinance focuses on individual trees, but misses recognition of the whole community of organisms that live within an area, in this instance within the walnut woodland. Replacement of specimen trees on a site that has its habitat area significantly reduced to accommodate structures does not offset the impacts to this recognized rare Natural Community.

The project fails to consider the benefit of tree clusters in sensitive areas. A ribbon of 15 trees along the edge of a property has far less biological value than a cluster of established trees which form the foundation of a woodland plant community. Black walnut woodlands are under severe threat by urbanization and considered to be one of the state's rare and imperiled natural communities (Jones & Stokes Associates 1987). *Juglans californica* is endemic to California where it exists in only four counties in Southern California.

3. Significant cultural and tribal resources to local indigenous communities may be destroyed.

We wholeheartedly agree with the Santa Monica Mountains Conservancy's statement that "The subject natural land form and its natural resource values located in an urban area is not the location to address the housing shortage by leveling a large forested knoll in perfect proximity to public facilities and public access."

Additionally, this is only ONE of several large development projects in the El Sereno community that propose to remove rare and nearly threatened natural resources, and do little to provide affordable housing. The cumulative effects of these projects will only serve to displace local residents by gentrifying the area, and will destroy natural resources that cannot be replaced.

However, at this late stage of the project, we offer an alternative, akin to California's Dept. of Fish & Wildlife's Conservation & Mitigation Banking policy. We recognize that constraining development on private property is a challenging objective for city officials. We also recognize that undeveloped land within city limits is a rapidly disappearing resource, and that its loss has negative impacts on the wellbeing of human and nonhuman inhabitants alike. To help offset the damage done by new development on previously undeveloped land, we recommend that you require an additional 2:1 area mitigation for the loss of the walnut woodland and require the applicant to purchase two times the area affected (or equivalent sum of money) and donate it to the SMMC for the protection of rare and threatened habitat.

We are happy to assist with this process.

Thank you for taking this matter into consideration.

A handwritten signature in black ink, appearing to read 'Shelley', with a stylized flourish extending to the right.

Shelley Billik

Chair, Community Forest Advisory Committee

Cc: Councilmember Kevin de León, CD 14