

## Communication from Public

**Name:** Angelenos for Trees

**Date Submitted:** 02/07/2022 02:01 PM

**Council File No:** 21-1414

**Comments for Public Posting:** Angelenos for Trees supports CFAC's approval of the motion for SB9 provided the motion includes the proposed amendment to allow green space for private shade trees to grow. A copy of CFAC's letter and proposed amendment is attached. The amendment is essential for the health and safety of all Angelenos and will help the city to meet its climate resiliency goals for energy efficiency, water conservation, shade inequity, stormwater retention, and biodiversity.



February 6, 2022

Re: CF 21-1414, support IF AMENDED

From: the Community Forest Advisory Committee

The city's Community Forest Advisory Committee (CFAC), is tasked with advocating for the protection and expansion of a healthy and robust tree canopy for the City of Los Angeles. As members appointed by each Council District and the Mayor's office, our role is to advise the City Council and city departments on tree-related policies and help develop programs which protect and expand the city's urban forest for the health and well-being of all Angelenos.

Trees and green space are natural and cost-effective infrastructure that play a crucial role in reducing rising temperatures and fighting climate change. Trees provide environmental services, including lowering ambient temperatures, purifying the air we breathe, enhancing groundwater recharge, supporting biodiversity, and sequestering carbon. They also increase home values, support commerce and reduce crime. As trees mature, the benefits increase: for every \$1 spent on the urban forest, we enjoy \$6 in increased benefits. In short, trees and green space make densely populated cities healthy and more livable.

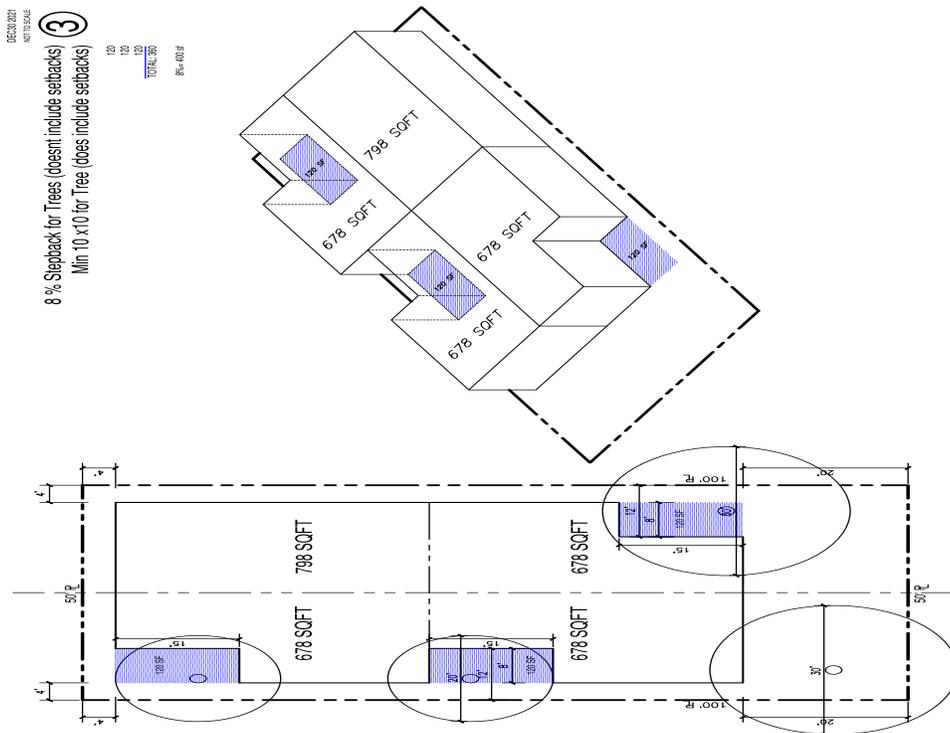
However, according to studies by USC, Tree People, LMU and the Google Tree Canopy Lab, Los Angeles has experienced an unprecedented decline in its overall tree canopy over the last 20 years. In some neighborhoods the loss of tree canopy has reached 50%. Much of the canopy loss has been attributed to development such as mansionization, and the City of LA's policies and ordinances fail to address this. Currently Los Angeles' overall tree canopy cover is around 14%, and as low as less than 1% in many neighborhoods. When we consider that a robust canopy can reduce ambient heat by as much as 20-40 degrees, it's clear that the loss of large shade trees is unacceptable in our steadily warming urban environment. While planting new trees is important, we must also preserve mature trees. The USC Urban Trees Initiative, UCLA Institute of Environment and Sustainability, and Tree People's Cooling Collaborative all emphasize the importance of preserving mature trees, which are now providing benefits that newly planted trees will not deliver for several decades.

Since SB9 aims to provide ministerial approvals for subdividing lots and building multiple units, without environmental review of the existing trees and greencover, CFAC supports the motion IF AMENDED to include the following:

I FURTHER MOVE that the City Council instruct the City Planning Department with the assistance of the City Forest Officer, the Urban Forest Division, the Community Forest Advisory Committee, and non-profit organizations with expertise on urban forestry, to incorporate the goals established in the City’s Green New Deal, LASAN’s Biodiversity Report, and the City’s Climate Change goals, to preserve, take care of, and grow the City’s urban tree canopy by incorporating “step-back” requirements to include the sum of **at least 8% of the total parcel area** (not including the setback area) for trees, in order to allow for 10 ft width from the side parcel line (perpendicular) and 10 ft depth (parallel) to allow spaces for large and native shade trees to grow. The City shall require all plans to comply with LAMC 12.12C.1.(g) and shall require each parcel to **preserve significant mature trees (measuring 12” and bigger at Diameter Breast Height “DBH”)**, and to plant (or preserve) a minimum of 1 large native shade tree per unit, and to follow an **“inch for inch” 2:1 tree replacement if any trees are removed**, the species to be in accordance with an approved private property master tree list. Hillside areas with native habitat shall always have an environmental review.

[If this provision is included, please delete entirely the language in the 3rd “I FURTHER MOVE” clause.]

Example of “step-back” and 8% of parcel:



Thank you,

Shelley Billik, Chair  
LA Community Forest Advisory Committee (CFAC)

## Communication from Public

**Name:** Crenshaw Manor Community Association  
**Date Submitted:** 02/07/2022 03:43 PM  
**Council File No:** 21-1414  
**Comments for Public Posting:** The Crenshaw Manor Community Association (CMCA) SUPPORTS the motion submitted by Councilmembers Paul Koretz & Bob Blumenfield, and seconded by Nithya Raman. Please see the attached letter for more details.



CRENSHAW MANOR  
COMMUNITY ASSOCIATION



February 7, 2022

Re: Council File #21-1414

Honorable Members of the Los Angeles City Council,

Crenshaw Manor Community Association (CMCA) represents 936 households in one of the last long-standing African American neighborhoods in South Los Angeles. We SUPPORT CF 21-1414, and feel it is important for Los Angeles to outline local specifications to guide developers and protect stakeholders and request that these issues be reflected in other future Land Use decisions, including CF 21-1045.

Los Angeles has a housing shortage, that is best addressed by local policy which addresses housing needs in a comprehensive method that considers realistic concerns regarding future development. The passing of SB9 has created an unavoidable adverse impact upon the physical environment for which the city must not ignore. It is important that both the short-term memorandum and the long-term ordinance establish basic perceptions applicable to all SB9 projects, including, but not limited to:

- **Objective Zoning/Subdivision/Design Standards** – Maintenance of existing building standards, as are allowed in the bill (including parking, setbacks (for rear & side yard should be prevailing setbacks for the tract map), RFA (should be strictly enforced using prevailing zoning, heights, size of created units, etc.).
- **Limitation on Number of Resulting Units** – Ideally, four maximum units resulting from a single parcel, or whatever minimum may be allowed via a city election to use a strict allowance for ADUs.
- **Applicant Residency** – Intent to Occupy one unit for three-year provision must be required. It must not be rendered a weightless requirement. It should: Require a written affidavit. This should not be available to impersonal entities (excepting Community Land Trust or Non-Profit). Timeframe should begin at occupancy, 3-years from the city's issuance of the unit's Certificate of Occupancy, and should be guaranteed by a bond or recorded lien on the subject property. If the property is sold within the 3-year period the same timeline should apply to the new owner. LLCs or Corporations shall not be permitted. A mechanism must be established to monitor and confirm whether said intent is fulfilled.
- **Exemptions** - Reports to clarify exemptions for sensitive areas, such as designated historic zone/properties should be categorically exempted. Very high-fire hazard severity zones (VHFHSZ), protected species habitats, horse keeping, substandard roadways, and/or other geographic areas as determined for which the implementation of SB9 would result in

specific, adverse impact. Currently, SB9 does NOT exempt VHFHSZ. Coastal zone should have similar safety-minded exceptions.

The following desired additions or revisions to the basic perceptions in CF 21-1414 should include two other serious concerns as it relates to South Los Angeles.

- A. SB9 applications for such unavoidable adverse impacts, should provide its written assessment to the applicable City Council Office, and shall deny a project if an unavoidable adverse impact is identified.
- B. Notification Requirements – Every SB9 filing shall require the City to notify those property owners and tenants within a 1000-foot radius from the proposed project site that a parcel has been filed with the city.

CMCA has serious concerns that SB9 will steer development to high opportunity areas with high exposure to the effects of speculation, gentrification, and other housing pressures. While SB9 does not allow for strict exemption of these areas, measures must be taken to avoid the risks and/or mitigate them.

SB9 provides NO true affordable housing provision. Especially in the low-income categories. Every SB9 project in the city should require that a fifty-five-year affordable covenant restricting rents to moderate income household (80-120% of AMI), or owner-occupation with price ceiling equivalent to current FHA mortgage limits. These limits should be applied to all new units and listed on the HCID registry of affordable units.

We cannot ignore the opportunity to make affordable housing gains and must address this deficiency with the passage of CF 21-1414. In doing so the city should require a payment of impact or development fees related to the specific impact that will be imposed on a community by the creation of a SB9 second lot and additional units. Impact fees can be related to a variety of impacts including but not limited to infrastructure, construction impacts, recreation, libraries, etc. Such collected funds should be deposited into a Special Fund to be used solely with the Community Plan Boundaries to which the project is located.

In summary, we SUPPORT the passage of CF 21-1414, adopting many of the points addressed in this letter. We ask that serious consideration be given to protecting socio-economically vulnerable communities like South Los Angeles.

Thank you,

Crenshaw Manor Community Association

[cmca@crenshawmanor.org](mailto:cmca@crenshawmanor.org)

Executive Committee Members:

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