

## Communication from Public

**Name:** Community Forest Advisory Committee

**Date Submitted:** 09/13/2024 02:56 PM

**Council File No:** 23-0623

**Comments for Public Posting:** The Community Forest Advisory Committee (CFAC) voted September 12, 2024 to submit this comment. Official letter with this content is attached. I am submitting this as the CFAC chair. This is our position and explanation. The Community Forest Advisory Committee (CFAC) is opposed to the Draft Affordable Housing Streamlining Ordinance (also known as the ED1 Ordinance) of 9/14/2023 and the Mayor's ED1 Directive (3rd revision) of 7/1/2024 unless amended as follows: Does not apply to Environmentally Sensitive Areas (such as within or adjacent to Open Space Areas, Santa Monica Mountains Zones, Biological Resource Areas, etc.) Requires rear yard setbacks of 15 feet (not 8 feet) to allow existing trees to be preserved and/or new trees to be planted with sufficient room to grow and to provide adequate natural shade, habitat, etc. A reduction of 50 percent on-site Open Space shall only apply if the project is within ½ mile of a public park or 60 percent of the units are comprised of two- and/or three-bedroom units. (Note: a reduction in open space often equates to a reduction of on-site landscaping and trees). Conversion of on-site open space (indoors or outdoors) shall not be permitted. No reduction in tree requirement shall be permitted. Projects that cannot fit all the required trees (one per every four units) on-site or as street trees in subject right of way, shall pay cash in lieu fees as required of all other projects. The additional off-site street trees that the in-lieu fees provide, shall be planted within close proximity to the project site (i.e. within a 500 foot radius). We cannot afford to reduce our tree canopy nor should we create more inequities in future projects. Please note more often than not, more trees are being removed from a site and are not being replaced, thus we are quickly losing our tree canopy as a result. Any proposed tree removal for street trees and protected trees shall follow the required discretionary review. These reviews can be expedited for affordable housing projects but should not be ministerial. At this time, we are also opposed to any additional Waivers and "Off Menu" incentives because there is a Draft Landscape and Site Plan Ordinance which CFAC has provided comments and suggestions on, however it has not been fully vetted yet, therefore we do not know what the outcome will be with respect to the required landscaping and trees requirement will be for any residential project over 5 units. Additionally, we

are reviewing the Sidewalk Repair Program Supplemental EIR that calls for the programmatic removal of thousands of street trees, as well as the proposed Wildlife Ordinance that has been sitting for years, yet to be codified, and a Protected Tree Ordinance that needs to be updated to include the preservation of more significant trees. . CFAC recognises the importance of providing affordable housing however when we start to incentivize providing less space for landscaping and trees, not to mention minimal to zero effort to preserve on-site trees, we are effectively creating an inequity by doing so, and worse, creating an unhealthy environment for all. We firmly believe all projects should be required to have sufficient room for trees, and that a more balanced approach is critical given our ongoing loss of tree canopy.

200 N. Spring Street  
Room 361  
Los Angeles, CA 90012-4801  
cd2cfac@gmail.com



Date: September 13, 2024

RE: CF 23-0623 / Proposed ED1 Ordinance

Dear Councilmembers,

The Community Forest Advisory Committee (CFAC) is opposed to the Draft Affordable Housing Streamlining Ordinance (also known as the ED1 Ordinance) of 9/14/2023 and the Mayor's ED1 Directive (3<sup>rd</sup> revision) of 7/1/2024 unless amended as follows:

1. Does not apply to Environmentally Sensitive Areas (such as within or adjacent to Open Space Areas, Santa Monica Mountains Zones, Biological Resource Areas, etc.)
2. Requires rear yard setbacks of 15 feet (not 8 feet) to allow existing trees to be preserved and/or new trees to be planted with sufficient room to grow and to provide adequate natural shade, habitat, etc.
3. A reduction of 50 percent on-site Open Space shall only apply if the project is within ½ mile of a public park or 60 percent of the units are comprised of two- and/or three-bedroom units. (Note: a reduction in open space often equates to a reduction of on-site landscaping and trees).
4. Conversion of on-site open space (indoors or outdoors) shall not be permitted.
5. No reduction in tree requirement shall be permitted. Projects that cannot fit all the required trees (one per every four units) on-site or as street trees in subject right of way, shall pay cash in lieu fees as required of all other projects. The additional off-site street trees that the in-lieu fees provide, shall be planted within close proximity to the project site (i.e. within a 500 foot radius). We cannot afford to reduce our tree canopy nor should we create more inequities in future projects. Please note more often than not, more trees are being removed from a site and are not being replaced, thus we are quickly losing our tree canopy as a result.
6. Any proposed tree removal for street trees and protected trees shall follow the required discretionary review. These reviews can be expedited for affordable housing projects but should not be ministerial.

At this time, we are also opposed to any additional Waivers and "Off Menu" incentives because there is a Draft Landscape and Site Plan Ordinance which CFAC has provided comments and suggestions on, however it has not been fully vetted yet, therefore we do not know what the

outcome will be with respect to the required landscaping and trees requirement will be for any residential project over 5 units.

Additionally, we are reviewing the Sidewalk Repair Program Supplemental EIR that calls for the programmatic removal of thousands of street trees, as well as the proposed Wildlife Ordinance that has been sitting for years, yet to be codified, and a Protected Tree Ordinance that needs to be updated to include the preservation of more significant trees. .

CFAC recognises the importance of providing affordable housing however when we start to incentivize providing less space for landscaping and trees, not to mention minimal to zero effort to preserve on-site trees, we are effectively creating an inequity by doing so, and worse, creating an unhealthy environment for all. We firmly believe all projects should be required to have sufficient room for trees, and that a more balanced approach is critical given our ongoing loss of tree canopy.

A handwritten signature in black ink that reads "Joanne D'Antonio". The signature is written in a cursive style with a large, prominent 'D'.

Joanne D'Antonio  
Chair, Community Forest Advisory Committee

CC: Mayor Karen Bass, Deputy Mayor for Housing Kevin Keller