

Communication from Public

Name: Patricia Bates

Date Submitted: 05/07/2025 10:48 AM

Council File No: 25-0002-S17

Comments for Public Posting: In the attached letter, the San Fernando Valley Audubon Society opposes Resolution CF 25-0002-S17 unless provision is made for re-evaluating the extent of clearance using empirical data and implementing a requirement that any removal of vegetation be supervised to avoid indiscriminate destruction of native shrubs and trees.



San Fernando Valley Audubon Society

Incorporated as California Audubon Society in 1913

P.O. Box 7769 • Van Nuys • CA • 91409-7769

www.sfvaudubon.org • 747-237-3720

For the conservation of wildlife, natural resources, and nature education.

May 6, 2025

Re: OPPOSITION TO [CF 25-0002-S17](#)

Honorable Los Angeles City Council Members:

The San Fernando Valley Audubon Society (SFVAS) concurs with the [Los Angeles Community Forest Advisory Committee](#) and the [Theodore Payne Foundation](#) in endorsing the position letter of the [Los Angeles Neighborhood Council Sustainability Alliance \(LANCSA\)](#) submitted as a CIS in opposition of CF 25-0002-S17. The full text of that CIS letter is attached to this communication.

The council resolution proposes a 700' brush clearance margin from structures in land owned by the Mountains Recreation and Conservation Authority (MRCA), all of which is chaparral in parkland adjacent to some of our hillside Los Angeles city communities. While everyone would agree MRCA should do reasonable weed abatement adjacent to streets, residences and public areas, the request is massively overreaching and without requirements to protect existing native vegetation.

The excellent report "Los Angeles does not need 700' of defensible space" by urban ecologist Dr. Travis Longcore provides and references scientific evidence based on past fires leading to the conclusion that clearance of more than 100' of adjacent vegetated interface is not beneficial to prevention of residential ignition. Indiscriminate clearance of 700' of vegetation would result in a monoculture of flammable weeds and grasses which are not suitable hosts for most of our invertebrates, or the birds which feed on them. These chaparral areas naturally contain shrubs such as Toyon, Chamise, Sugarbush, California Sagebrush and many more which host multiple caterpillars, butterflies and other insects which support our songbirds as well as other fauna.

Accordingly, the **SFVAS opposes** Resolution CF 25-0002-S17 unless provision is made for re-evaluating the extent of clearance using empirical data and implementing a requirement that any removal of vegetation be supervised to avoid indiscriminate destruction of native shrubs and trees. Perhaps that would be a good time to consider re-establishing native chaparral communities in disturbed areas.

Sincerely,

Patricia Bates
Co-Chair Conservation and Sustainability Committee
San Fernando Valley Audubon Society
info@sfvaudubon.org

CC:

Dan Cooper, Deputy Executive Officer and Principal Conservation Biologist, Resource Conservation District of the Santa Monica Mountains (RCDSMM)

Paul Edelman, Chief, Natural Resources and Planning, Mountains Recreation and Conservation Authority, and Deputy Director, Santa Monica Mountains Conservancy

Joseph T. Edmiston, Executive Officer, Mountains Recreation and Conservation Authority Executive Officer, and Executive Director, Santa Monica Mountains Conservancy

Tracy Lovric, District Manager, Resource Conservation District of the Santa Monica Mountains (RCDSMM)

Congresswoman Laura Friedman

NEIGHBORHOOD COUNCIL SUSTAINABILITY ALLIANCE®

April 17, 2025

RE: Opposition to [Resolution](#) in [CF 25-0002 S17](#), Public Resources Code Section 4291 / Government Code Section 51182 / Mountains and Recreation Conservation Authority (MRCA) / Brush Clearance / Fire Hazard Severity Zones

Dear City Council,

While this resolution is no doubt well intended, it would, if implemented, only make [Mountains Recreation and Conservation Authority \(MRCA\)](#) lands hotter, drier, and more flammable.

Brush clearance as conducted by contractors includes our native shrubs and trees, yet the removal of all of these creates space that will attract highly flammable invasive plants and fuel hotter, more dangerous fires.

It is critical to make a distinction between the vegetation species that belong in this ecosystem and the problematic vegetation that has been introduced from elsewhere and causes us problems. As we have seen in recent fires, native plants, especially oak trees, have acted as ember catchers and fire breaks, neither burning themselves nor adding fuel to raging fires.

Removing these native trees and shrubs leaves our hillsides barren, prone to erosion and mudslides. Invasive grasses and weeds, which will take advantage of the opportunity to seed themselves in the open area, do not adequately support the slopes. There will be devastating effects on biodiversity as habitat is destroyed, interrupting the ecology and potentially affecting human health.

Scientists recognize this as "landscape type conversion," and, as written, this resolution is actively proposing that MRCA lands be converted from native coastal sage scrub and chaparral plant communities to arid, flammable, species-poor grasslands. Although we do not believe that this is the intention of this motion, this would be its result.

MRCA lands are valuable because of the biological habitat they conserve. Stormwater and fog keeps plants hydrated and resilient. This motion must be amended to remove all mention of clearing "brush" in MRCA lands because the contractors who do this work, in our experience, do not differentiate good fire-resistant native vegetation from the much more flammable bad invasive grasses, annual weeds, and specific non-native shrubs and trees. Contractors need to be trained to distinguish plants and do invasive weed abatement while protecting the native plants and trees. By all means, remove the

flammable mustard, arundo, echium, fountain grass, pampas grass, and other invasive weeds for miles, even from the whole state. Otherwise, as we see across the city, the weed whackers, crawlers, and small bulldozers will just cut everything down.

The "700 foot" clearing requirement proposed in the resolution unnecessarily spreads destruction into the fragile open spaces and parklands, which MRCA is dedicated to preserving. What could the cumulative environmental impact be given this large area?

Also, this proposal should align with California law. [AB 3074](#) (Friedman), enacted in 2020, clearly requires "regionally appropriate vegetation management suggestions that **preserve and restore native species** that are fire resistant or drought tolerant, or both, minimize erosion, minimize the spread of flammable nonnative grasses and weeds, minimize water consumption, and permit trees and shrubs near homes for shade, aesthetics and habitat; suggestions for fuel modification beyond the property line **in order to maintain 100 feet of defensible space from a structure...**" (*The bolding is ours.*) The Los Angeles County Fire Department has already embraced this new defensible space law and targets invasive weeds and grasses rather than native shrubs and trees, and we expect LAFD to revise their guidelines to follow the law soon as well.

For more information, backed by fire ecology research and related science, see [Resource Conservation District of the Santa Monica Mountains \(RCDSMM\)](#)'s [Sustainable Defensible Space](#).

The tragic fires this past January were human sparked, fueled by human-spread invasive weeds and grasses, intensified by flammable human development, and, [according to scientists, made worse by human-caused climate change](#).

Please do not require further human-led destruction. Rather, please support human-led repair, restoration, and resilience efforts.

We need to stop thinking of nature as fuel and as the enemy. Even lightly hydrated plants can act to stop fires and protect homes, as we saw in January.

Sincerely,

Lisa Hart



Executive Director,
Los Angeles Neighborhood Council Sustainability Alliance
lisahart@ncsa.la
323.660.2780 (cell)
ncsa.la

CC:

Dan Cooper, Deputy Executive Officer and Principal Conservation Biologist, Resource Conservation District of the Santa Monica Mountains (RCDSMM)

Paul Edelman, Chief, Natural Resources and Planning, Mountains Recreation and Conservation Authority, and Deputy Director, Santa Monica Mountains Conservancy

Joseph T. Edmiston, Executive Officer, Mountains Recreation and Conservation Authority Executive Officer, and Executive Director, Santa Monica Mountains Conservancy

Tracy Lovric, District Manager, Resource Conservation District of the Santa Monica Mountains (RCDSMM)

Congresswoman Laura Friedman