



RE: Council File 25-1259 Voted at regular CFAC meeting 3-5-'26

The Community Forest Advisory Committee opposes the *Small Lots Big Impacts* initiative (Council File 25-1259) unless it is amended to exclude hillside properties located in High and Very High Fire Hazard Severity Zones.

Small lot subdivision and development in these areas inevitably results in the removal of existing vegetation to accommodate building footprints, grading, access, and required defensible space. In addition, once these lots are built out, the combination of limited lot area and fire-safety spacing requirements leaves little to no viable space for the planting or long-term retention of trees and shrubs. As a result, even where mitigation replacement planting is required under the City's Protected Tree Ordinance, the practical effect of small lot development in hillside fire hazard zones is the permanent loss of meaningful tree canopy and vegetative cover.

For these reasons, hillside parcels located in High and Very High Fire Hazard Severity Zones should be excluded from the *Small Lots Big Impacts* initiative.

Joanne D'Antonio

Chair, Los Angeles Community Forest Advisory Committee (CFAC)