

## Communication from Public

**Name:** Snowdy Dodson  
**Date Submitted:** 11/28/2020 08:43 AM  
**Council File No:** 13-1339  
**Comments for Public Posting:** See attached for our CNPS Chapter's letter regarding the inclusion of elderberry and toyon to the list of protected trees in the Protected Tree List.

Los Angeles/ Santa Monica Mountains Chapter  
15811 Leadwell St., Van Nuys, CA 91406  
Nov. 24, 2020

Councilmember Bob Blumenfield, Chair,  
Members of the Public Works & Gang Reduction Committee  
City of Los Angeles  
200 N. Spring St. Room 361  
Los Angeles, CA 90012  
Via email

RE: Amendment to add toyon & Mexican elderberry to the Protected Tree Ordinance (CF 13-1339)

Dear Chairperson Blumenfield & Committee Members:

On behalf of the California Native Plant Society (CNPS), Los Angeles/Santa Monica Mountains Chapter, I am writing to support the addition of toyon (*Heteromeles arbutifolia*) and elderberry (*Sambucus* sp.) to the Los Angeles City Protected Tree Ordinance (PTO), which already includes native oaks, California black walnut, western sycamore, and California bay. Currently toyon and elderberry are classified as shrubs; however, if left in place, they mature into native trees. These native plants are adapted to re-sprout soon after a fire and are major contributors to erosion control on our hillsides. Both Toyon and elderberry produce abundant flowers and edible berries that provide food for butterflies, native bees and other pollinators as well as for such birds as hummingbirds, jays and cedar waxwings. They also provide important habitat for bird nesting and overwintering.

Thus, Toyon and elderberry are an integral part of the local ecosystem. They should be protected so that they can continue to contribute to the genetic biodiversity of our urban environment and make our City a more sustainable place to live. It should be noted that toyon, a.k.a California holly, has been designated the official native plant of the City of Los Angeles and is purported to be the plant for which Hollywood was named. Both toyon and elderberry were/are important to the ethnobotanic histories of California's Native American populations. In addition, elderberry and toyon are excellent horticultural plants that are fast growing and drought tolerant.

CNPS also supports the recommendations of the City's Community Forest Advisory Committee (CFAC) that the original language in the Protected Tree Ordinance on the measurement standard of 4" cumulative at 4 1/2 feet (4" cumulative DBH - diameter at breast height) should apply to all species, including the two new species, toyon & Mexican elderberry; and that on-site tree replacements should be the rule. In instances where protected species replacements cannot be accommodated on-site, project designs should be altered, or if absolutely necessary, the choice and use of out-of-kind replacement species for planting must be approved by the Board of Public Works, at a public hearing (not by designee). CNPS supports adding dedicated staffing for administration and enforcement of the Protected Tree Ordinance, to be established in LASAN's Biodiversity group or the Climate Emergency department and an escalated fee structure based on full cost recovery for implementation staff to administer the Protected Tree Ordinance. PTO

implementation should be fully funded by fees paid by the very projects that financially benefit from the removal of native habitat.

The California Native Plant Society (CNPS) is a non-profit organization of nearly 10,000 laypersons and professional botanists with 35 statewide chapters. Our mission is to increase the understanding and appreciation of California's native plants and to conserve them in their natural habitats through education, science, advocacy, horticulture and stewardship. We urge you to afford native tree protection to toyon and elderberry in order to further protect California's native habitat and contribute to the ecosystem health of our City. We further ask you to add meaningful enforcement to the PTO to provide protection for what little remains of our urban natural world.

Sincerely,

Snowdy Dodson, Chapter Co-President  
Email: [snowdy.dodson@csun.edu](mailto:snowdy.dodson@csun.edu) Ph: 818-782-9346

CC: CFAC; Councilmember O'Farrell; Councilmember Buscaino; Councilmember Ryu;  
Councilmember Lee; Councilmember De Leon; Mayor Garcetti