

Communication from Public

Name: Cindy Grant

Date Submitted: 06/18/2023 09:20 AM

Council File No: 14-0518

Comments for Public Posting: I strongly support the Wildlife Ordinance. It will help native flora and fauna survive in our Santa Monica Mountains through carefully crafted development standards that protect both wildlife and property interests. I encourage the adoption of this district ordinance so that it can be expanded to sensitive habitat throughout the entire City of Los Angeles. As an architect with an interest in working with the site and natural landscape, I am disheartened by some of the development in our hills that has left tremendous scars and fragmentation, with disregard to the native flora, fauna, the very culture of the hillside area, and respect for the land. I'll attach photos of two properties that can be seen from Chalon and Benedict Canyon that are the most egregious examples. If these were able to be developed within the current hillside standards then we surely need more protections in place. I am encouraged that the Wildlife Ordinance may be able to help cease some of the irresponsible and unwanted sprawl in the hillside area, to retain and enhance what still survives, and assist the area to thrive.



Communication from Public

Name: Diane

Date Submitted: 06/18/2023 01:07 PM

Council File No: 14-0518

Comments for Public Posting: I believe the borders drawn for the Proposed Wildlife District Ordinance are overbroad and inappropriate. In Studio City, the border in some parts is just south of Ventura Boulevard (specifically, the area between Fulton and Coldwater Canyon). This area has residential properties on small lots. It is already plagued by a large coyote population in a suburban neighborhood and has experienced many coyote attacks on pets. The map should be revised to exclude this area from the Proposed Wildlife District Ordinance. I've attached a portion of the Proposed Wildlife District Ordinance, highlighting in yellow some of the neighborhoods that are inappropriately included within the borders of the Proposed Wildlife District Ordinance.



LOS ANGELES
CITY PLANNING
Citywide Policy

Draft Wildlife Resources

Wildlife District Boundary

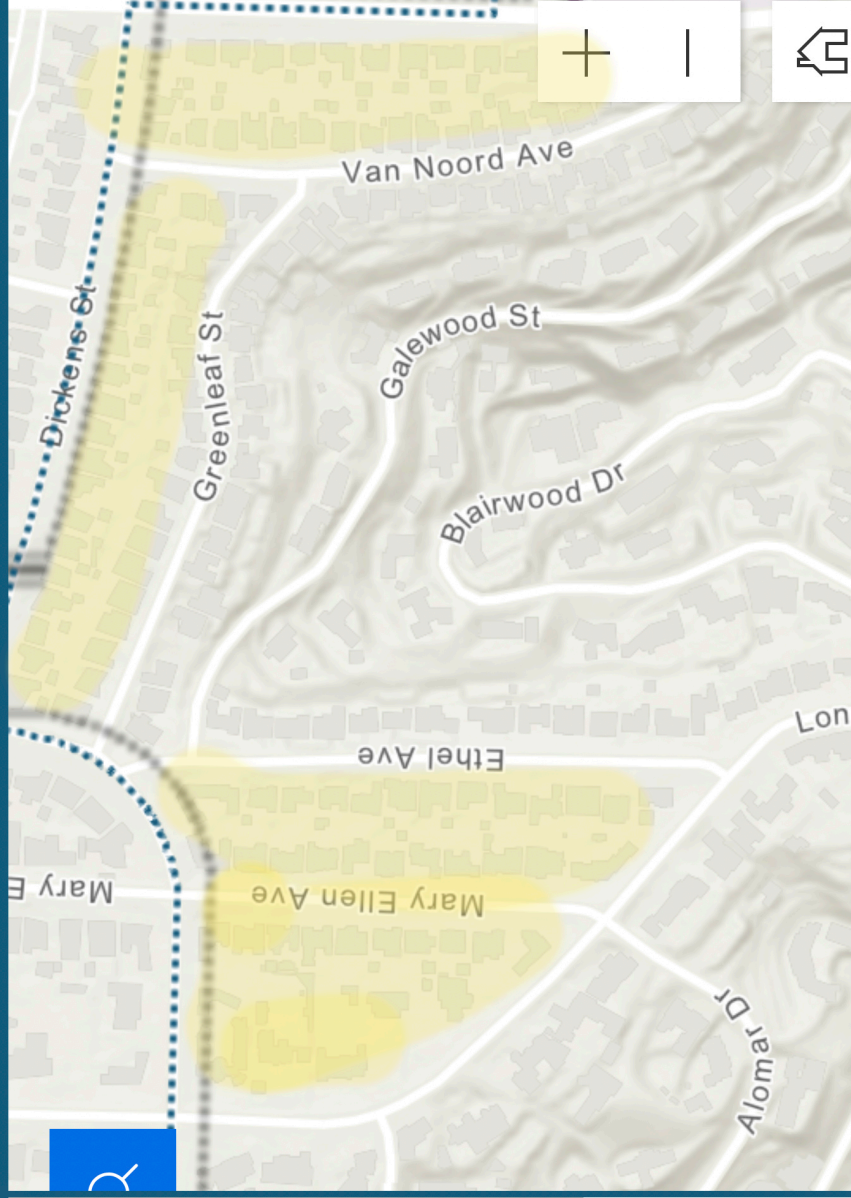


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Water Resources - Lakes,
Reservoirs, Ponds, Wetlands,
Rivers, Streams, Creeks, Riparian
Areas



Onan Snara Resources



Communication from Public

Name: South LA Tree Coalition

Date Submitted: 06/18/2023 09:41 PM

Council File No: 14-0518

Comments for Public Posting: TO: Planning & Land Use Management Committee RE: Council File: 14-0518, Case No. CPC-2022-3414-CA, CPC-2022-3712-ZC Dear Council Members: The South LA Tree Coalition supports the Draft Wildlife District Ordinance which establishes critical and progressive guidelines for the retention and growth of elements of the city's natural infrastructure. These protective efforts will safeguard human health, biodiversity and the sustainability of communities at a time when the City is working hard to combat the threats of climate change. The South LA Tree Coalition acknowledges the significance of trees, green space and open space as vital components of our region. This ordinance, although pertaining to a particular area of the city, establishes precedent for effective management and stewardship of vital natural infrastructure efforts. Specific to trees, the proposed ordinance provides for enhanced review and consideration for not only protected trees but significant trees as well. Currently, protections for existing significant trees are not sufficiently regulated or enforced. For South LA residents the proposed implication of the wildlife ordinance offers direct solutions for the challenge of wildlife encroachment into local neighborhoods. Hundreds of residents across South LA know too well the presence of wildlife including coyotes, in local streets, yards and urban spaces. This ordinance will support protection of natural habitat to allow for such wildlife to remain in more natural spaces and better buffered from urban contact. We thank you for your consideration. Robin Gilliam & Theresa Maysonet South LA Tree Coalition southlatrees@gmail.com P.O. Box 19068 Los Angeles, CA 90019 About SLAT The South LA Tree (SLAT) Coalition is a 501(c)(3) non-profit founded by women of color. Since its origins in 2021, in response to the removal of a grove of Protected Sycamore trees in South LA as a result of a development project, the SLAT Coalition works through grassroots efforts to prioritize the preservation, protection and growth of the urban forest and its tree canopy in South LA – a designated tree-poor region of the City. The SLAT Coalition aims to grow community awareness and agency in strengthening the role of trees as part of larger efforts including environmental justice, climate resiliency, biodiversity, and community wellness



June 17, 2023

TO: Planning & Land Use Management Committee

RE: **Council File: 14-0518, Case No. CPC-2022-3414-CA, CPC-2022-3712-ZC**

Dear Council Members:

The South LA Tree Coalition supports the **Draft Wildlife District Ordinance** which establishes critical and progressive guidelines for the retention and growth of elements of the city's natural infrastructure. These protective efforts will safeguard human health, biodiversity and the sustainability of communities at a time when the City is working hard to combat the threats of climate change.

The South LA Tree Coalition acknowledges the significance of trees, green space and open space as vital components of our region. This ordinance, although pertaining to a particular area of the city, establishes precedent for effective management and stewardship of vital natural infrastructure efforts. Specific to trees, the proposed ordinance provides for enhanced review and consideration for not only protected trees but significant trees as well. Currently, protections for existing significant trees are not sufficiently regulated or enforced.

For South LA residents the proposed implication of the wildlife ordinance offers direct solutions for the challenge of wildlife encroachment into local neighborhoods. Hundreds of residents across South LA know too well the presence of wildlife including coyotes, in local streets, yards and urban spaces. This ordinance will support protection of natural habitat to allow for such wildlife to remain in more natural spaces and better buffered from urban contact.

We thank you for your consideration.

Robin Gilliam & Theresa Maysonet
South LA Tree Coalition
southlatrees@gmail.com
P.O. Box 19068
Los Angeles, CA 90019

About SLAT

The South LA Tree (SLAT) Coalition is a 501(c)(3) non-profit founded by women of color. Since its origins in 2021, in response to the removal of a grove of Protected Sycamore trees in South LA as a result of a development project, the SLAT Coalition works through grassroots efforts to prioritize the preservation, protection and growth of the urban forest and its tree canopy in South LA – a designated tree-poor region of the City. The SLAT Coalition aims to grow community awareness and agency in strengthening the role of trees as part of larger efforts including environmental justice, climate resiliency, biodiversity, and community wellness

Communication from Public

Name: Lawrence Lincoln

Date Submitted: 06/19/2023 04:21 AM

Council File No: 14-0518

Comments for Public Posting: Please see the attached change.org petition along with the signatures, which over 400 people have signed, supporting the immediate passage of the wildlife corridors ordinance by the Los Angeles City Council. The petition can be found online here: <https://chnng.it/vpX5STWW5S>

[Dashboard](#) [Petition details](#) [Edit](#) [Comments](#)

SAVE FUTURE P-22's: TELL LA CITY COUNCIL TO APPROVE WILDLIFE ORDINANCE NOW!

Started

February 4, 2023

413

Signatures

500

Next Goal



Lawrence Lincoln signed this petition



John Monsen signed 7 hours ago



teresa lake signed 20 hours ago

[Share this petition](#)

Why this petition matters



Started by [Lawrence Lincoln](#)

Our beloved Hollywood Mountain Lion, P-22, dodged cars, avoided rodenticide and managed to survive in LA's urban jungle for a decade before old age, ill health and the rest caught up with him. [He died several weeks ago](#) and **we are all mourning his tragic loss.**

But we must not let his passing be in vain. The enormous turnout for the [celebration of his life](#), which apparently even crashed Ticketmaster, shows how much [the City of Angels loved their cougar](#). Congressman [Adam Schiff's suggestion of a postage stamp](#) is great, *but we can do something that actually, really protects our wildlife going forward.*

There is something very important you can do right now to protect all the other mountain lions living quietly in and around the Santa Monica mountain, as well as all the other wildlife we share our urban city with. *It's not just about building bridges across freeways, it's about actively protecting our hillside areas.* [The Los Angeles City Council has brought forward a groundbreaking ordinance to protect the hillsides from overdevelopment](#) in our most urban of cities. That means, if you are building a new house, you should leave a little extra room around your property for wildlife to pass, particularly if you are situated in a known wildlife area. It's simple, it protects our quality of life in the hillsides and canyons (I live in Laurel Canyon), and, best of all, homes near wildlife preserves generally always increase in value. It's a win-win-win all across the board.

[A version of the ordinance weakened by political deal-making was approved](#) by the Los Angeles Planning Commission this past December 2022, now we need to [push hard to get the City Council to re-strengthen the ordinance](#), bring it to Planning committee as soon as possible, and get the whole City Council to approve it and Mayor Bass to sign it.

So, right now, while you're thinking about it:

1) Please sign the petition below calling on the Los Angeles City Council, especially Councilwomen Nithya Raman and Katy Yaroslavsky, to strengthen the wildlife ordinance back to an earlier version, and, most urgently, tell the City Council to approve this ordinance NOW!

2) Also, please [sign the Center for Biological Diversity's excellent action alert](#) which will send emails directly to the Los Angeles City Council.

Share this petition

support. Letters are already in there if you need samples. Demand the City Council strengthen the ordinance back the way it was.

4) Sign up on on the [CLAW \(Citizens for LA Wildlife\)](#) website to get updates and actions you can take.

5) [Sign up here](#) on the LA City Planning page to receive updates on the ordinance.

 [Report a policy violation](#)

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English (United States)



	A	B	C	D	E
1	Name	City	State	Postal Code	Country
2	Lawrence Lincoln	Los Angeles	CA		US
3	Wendy-Sue Rosen	Los Angeles	CA	90049	US
4	Nanci Sackett	Redding	CA	96003	US
5	Mary Heyman	Palm Desert	CA	92260	US
6	Josh Standiford	Lake Zurich		60047	US
7	Carol Capwell	Upperco		21155	US
8	Matthew Burdette	JoeRoganPodcast		69420	US
9	Daniel Coxson	Olney		20832	US
10	Liberty Bell	Talkeetna	AK	99654	US
11	Kate E. Byrne Haltom	Los Angeles		91335	US
12	Deborah Spencer	Billerica		1821	US
13	Gina Thornburg	Spring Hill	KS	66083	US
14	shawn hunter	Groton		6340	US
15	Negar Mokhtari	Hillsboro		97129	US
16	Arline Lohli	Las Vegas		89129	US
17	kelly Vieitez	Fort Lee		7024	US
18	Rafael Pastrana	Tampa		33647	US
19	Ray Yow	San Antonio		78244	US
20	Jerry Doughty	Mabelvale		72103	US
21	Terri Alward	Nottingham		21236	US
22	yolanda schultes	Wittenbach	CA	9300	US
23	Christeen Anderson	Crestview	FL	32539	US
24	Dominique Lang	Vaison la Romaine		84110	France
25	Katalin Kónya-Jakus	Szatymaz			Hungary
26	Anne Montarou	Ahrensburg		22926	Germany
27	Christna Frutuoso	Esch		4069	Luxembourg
28	Patricia Broun	Los Angeles	CA	90034	US
29	Deanna Hutchinson	Los Angeles	CA	90006	US
30	Chantel Ramnanan	Cambridge		N1r 5g5	Canada
31	Margit Ristimäki	Helsinki			Finland
32	Karine Simonart	Sambreville		6200	Belgium
33	Maria Hernandez	San Antonio	TX	78207	US
34	James White	Los Angeles	CA	90009	US
35	Sabine Möhler	esselbach		97839	Germany
36	Jessica Yow	Lacey		98503	US
37	Mark Cooney	Boca Raton		33433	US
38	Falcon Knight	Brooklyn	NY	11226	US
39	Linda Ratliff	Grundy		24614	US
40	Ashley Zimmerman	Henderson		89074-4170	US
41	kara mice	Parkersburg		26104	US
42	Devin Diamond	Chicago		60609	US
43	Diane Guerin	Montreal		H1X2L3	Canada
44	Reanako Reanako	Orlando		32839	US
45	Alexander Shaw	Newport Beach		92663	US
46	Colin curtin				US

	A	B	C	D	E
47	t ara	los angeles		90014	US
48	luna S.	Miami		33129	US
49	Julie Renner	Easton		18042	US
50	John Bias	Ammon		83407	US
51	jenny gallaway	Wheeling		26003	US
52	Clara Kang	Queens		11365	US
53	Nishantha Wijenaike	Matara			Sri Lanka
54	Raquel Glaspie	Queens		11412	US
55	Anne Allbritton	Irondale		35210	US
56	Liana Peterson	Johnstown		15906	US
57	Bonnie Billiot	New Orleans	LA	70125	US
58	Mozhdeh Baniasadi	Reston		20190	US
59	Ashton Wren				US
60	Jim Hanson	Winter Park		32789	US
61	Colin Watson				US
62	vielka Valenzuela	Tujunga	CA	91042	US
63	loonA baboon	San Marcos	CA	92078	US
64	Christian Esiegbue	Hanford		93230	US
65	NoBody InVR	Denver		80251	US
66	Jerome Ilomuanya	Richmond	TX	77469	US
67	Tanya Romero	phoenix		85027	US
68	Kelsey Didia	Carmel		47708	US
69	Roann Schott	Plains		59859	US
70	Laura Coughanour	Manassas	VA	20110	US
71	Joyce Alexander	Edinburgh	SCT	EH11	UK
72	Jim Stewart	Los Angeles	CA	90006	US
73	Kourtnie Good	Los Angeles	CA	90066	US
74	Marga Gili	Palma		7003	Spain
75	Alison Simard	Los Angeles	CA	90046	US
76	Bett Weston	Ann Arbor	MI	48113	US
77	Julia Cisneros	Tujunga	CA	91042	US
78	JULIA ORR	Napa	CA	94559	US
79	Marcel Alexandrovich	DKI Jakarta		12240	Indonesia
80	sadie al	South Jakarta		12514	Indonesia
81	R S	Koln		51069	Germany
82	Paulinda Schimmel	Studio City	CA	91604	US
83	corine cathala	Pierrelatte		26700	France
84	Mike Andrews	Hamilton		L8N1M2	Canada
85	Adea Claude	Saint-Quentin		2100	France
86	Melanie Winter	Studio City	CA	91604	US
87	Jan Gielkens	Weert		6005RV	Netherlands
88	JON INWOOD	Brooklyn	NY	11230	US
89	Abby Belkin	Los Angeles	CA	90006	US
90	Vanessa Poster	Redondo Beach	CA	90277	US
91	Susana Muñoz	Madrid		28019	Spain
92	Monica Parmar	Calabasas	CA	91302	US

	A	B	C	D	E
93	Sylvie Herbaut	Aubignan		84810	France
94	amanda M			75009	France
95	Dan Silver	Los Angeles	CA	90060	US
96	Maria Martinez	Muscle Shoals		35661	US
97	Zack Seals	Morristown		37814	US
98	ravi g	Latrobe		15650	US
99	Lisa Maccaro	Toms River Township	NJ	8753	US
100	Elliott Weber	Greensburg		47240	US
101	Ellie Horvath	Ellicott City		21043	US
102	P Fisher	Newcastle		73065	US
103	Terry Hoskins	Indianapolis		46234	US
104	Ernest Smith	Charlotte		28208	US
105	Mariam Ali	Florence		25901	US
106	Leslie Swales	Stow		44224	US
107	Robert Fernandez	Brooklyn		11213	US
108	Laura Karr	Lexington		40502	US
109	Angela Birdsall	Marietta		30066	US
110	Donica Krska	Chicago	IL	60638	US
111	Marcus Ruelle	Melrose		2176	US
112	Yamileth Trinidad	durham		27713	US
113	Ka Natura	Portland		97222	US
114	Yich Eng	Queens		11358	US
115	Kayla Williams	Harrisonville		64701	US
116	Olivia Upton	Los Angeles	CA	90028	US
117	Shelley Billik	Los Angeles	CA	90046	US
118	Martine Cuisenaire	Heer			Brazil
119	G�rard Goulette	Montreal		H2L	Canada
120	Petra Hegenscheidt			45131	Germany
121	Gerard Goulette	Montr�al		H1e3e9	Canada
122	Tierney Brannigan	Los Angeles	CA	90025	US
123	Tony Tucci	Beverly Hills	CA	90209	US
124	Shayna Tyler	Vallentigny		10500	France
125	Anneke Andries	Raamsdonksveer		4941JT	Netherlands
126	Beth Anderson	Los Alamos	NM	87544	US
127	Claudia Neuhaufen	Bonn		53117	Germany
128	Niina Anttinen	Espoo			Finland
129	Danielle Langlois	Van Nuys	CA	91411	US
130	Dominique Girard	Marseille		13000	France
131	Adam Kaluba	Burleson	TX	76028	US
132	Leslie Purcell	Ventura	CA	93002	US
133	Roxana Moya	Santiago			Chile
134	Brenda Choi	Las Vegas	NV	89121	US
135	Elizabeth Limebrook	Aliso Viejo	CA	92656	US
136	Vulture Bones	Brooklyn	NY	11226	US
137	An�l�a Caiazza	Rosario. Santa Fe		2000	Argentina
138	jocelyne lapointe	terrebonne		j6w0b5	Canada

	A	B	C	D	E
139	Deena Adkins	Valley Village	CA		91607 US
140	Gabriella Reist-Schneid	Hopkinsville	KY		42240 US
141	Astrid V.d. Geest	Stadskanaal			9502 Netherlands
142	Michelle Riebeling	Thousand Oaks	CA	M	US
143	Joan Forman	Redondo Beach	CA		902678 US
144	Jen Carruthers	Los Angeles	CA		90026 US
145	Maggie Rufo	Novato	CA		94945 US
146	Marie-José CHOBERT	Orléans			45000 France
147	Judith Frazier	Winnetka	CA		91306 US
148	Jason Wise	Los Angeles	CA		90026 US
149	Joyce Brown	longueuil		j4l 1r8	Canada
150	Farahnaz Jalali	Calabasas	CA		91302 US
151	Rosa Cabrerizo	Hospitalet de Llobregat			8906 Spain
152	Consuelo Serena Velaz	Strambino Fr Cerone			10019 Italy
153	Pam Miller	Tolar	TX		76046 US
154	Mona Chatterji	San Francisco	CA		94102 US
155	Michelle Austin	Athens			10433 Greece
156	Andrew Vallender	Ventnor	ENG	PO38 1BH	UK
157	Graham edward Ingle	San Roque cadiz			11360 Spain
158	Julia Rigler	Grapevine	TX		76051 US
159	rolf wiesler	Johannesburg			2041 South Africa
160	Frances Weaver-Johns	Los Angeles	CA		90068 US
161	brigitte vanbekbergen	bruxelles			1060 Belgium
162	Patty Yoo	Tustin	CA		92780 US
163	wendy smith	Wigan		WN6	UK
164	i e	Castelloli			8719 Spain
165	Djamila Grouci	Nanteuil les meaux			77100 France
166	sara sang	los angeles	CA		91601 US
167	A. Otto	Auerbach			8209 Germany
168	mary dellenbusch	Niagara Falls		L2G	Canada
169	Bambi Mayr				Austria
170	Kevin Sewell	Nottingham	ENG	ng17 8bf	UK
171	laurence vanham	5310 leuze			5310 Belgium
172	Tony Nuccio	Los Angeles	CA		90068 US
173	sandra mason	Chesterton	IN		46304 US
174	Nelly PRESTAT	Mouroux			77120 France
175	Nelly Nyffeler	Derendingen			4552 Switzerland
176	Barbara English	Aliso Viejo	CA		92656 US
177	Judith Walter	Thousand Oaks	CA		91362 US
178	Ana Gruber	Wolfratshausen			82515 Germany
179	Dr. L. Donaker	Denver	CO		90049 US
180	Carrie Gleason	Littleton	CO		80130 US
181	Barbara Inyan	Graeagle	CA		96103 US
182	Raleigh koritz	Saint Paul	MN		55114 US
183	Cecilia Ball	MANHATTAN BCH	CA		90266 US
184	Jill Spady	Valencia	CA		91355 US

	A	B	C	D	E
185	Jennifer Parker	Los Angeles	CA	90068	US
186	Renata Cheferrino	Rio de Janeiro			Brazil
187	Maria SICILIANO	Los Angeles	CA	90034	US
188	Suzanne Marienau	Ozark	MO	65721	US
189	Ethan Dampf	Los Angeles	CA	90019	US
190	Jeanet Moltke	Calabasas	CA	91302	US
191	Denise Derouen	Houston	TX	7701777004	US
192	Robert Nowak				Poland
193	Wendy Forster				UK
194	Neil Ryding	Birchwood	ENG	wa3 6tb	UK
195	Debbie Macmillan	Helensburgh	SCT	G84	UK
196	Kate Kenner	Guilford	VT	5301	US
197	Susan Walsh	Verona		37036	Italy
198	Elisabeth Bechmann	Polten		3100	Austria
199	Yvette Duquette	Elliot Lake		P5A 1E7	Canada
200	pilar blas	san sebastian		20009	Spain
201	Ilean Brown	Elliot Lake		P5A	Canada
202	robert dampf	Woodland Hills	CA	91367	US
203	Tina M	Houthalen		3530	Belgium
204	Sheryl Schroeder	Buellton	CA	93427	US
205	Caroline Sévilla	Paris		75001	France
206	Laura Dampf	Topanga	CA	990290	US
207	Jasmine Cannon	Tucson		85731	US
208	requis snikerburger	Cottage Grove		55016	US
209	Chris Cristobal	Los Angeles		90028	US
210	Carter Hudson	Wooster		44691	US
211	Daihanna Bencosme	Garnerville ny		10923	US
212	daysi jaime	Los Ángeles		90015	US
213	Frédéric Jaubert	Pont de Chéruy		38230	France
214	Tiziana Dordoni	via xx settembre 11	Corsico milano	20094	Italy
215	Sue Schümmer	Ulm		89077	Germany
216	Maryann Staron	Hometown	IL	60456-1035	US
217	simone maes			9000	Belgium
218	Marcelle Mollentze	Johannesburg			South Africa
219	Leigh Coto	Viriginia Beach	VA	23462	US
220	Uwe Vietzke				Germany
221	Hamidah Lakhani	Calgary		T3p0h3	Canada
222	L Saunders	Masterton			New Zealand
223	Claire Schlotterbeck	Brea	CA	92823	US
224	Ann Cantrell	Long Beach	CA	90808	US
225	E. Tucci	Long Beach	CA	90807	US
226	Patricia Neves	Saint John		E2M-1P4	Canada
227	Linda Reilly	Cypress	CA	90630	US
228	Janine Vinton	Hastings		3915	Australia
229	Donna Platt	New Orleans	LA	70124	US
230	Heidi Siebens	Muizen		2800	Belgium

	A	B	C	D	E
231	Herbert Staniek	Vienna		1200	Austria
232	Susan Pappalardo	Little Egg Harbor Townsh	NJ	8087	US
233	Hariana Dias	Bogota		111311	Colombia
234	Jean Chagnon	Montréal		H2K	US
235	marinella bigoni	modena		41126	Italy
236	Maria Moore	Exeter	ENG	EX5 4HP	UK
237	Monica Riedler	Washington		20015	Austria
238	Jim Frageman	stanton	CA	90680	US
239	Wilma V Brandwijk	Vlaardingen		3132	Netherlands
240	Sylvie Auger	Trois-Rivières		G9A	Canada
241	Karen Hoyle	Lincolnshire	ENG	Ln130dl	UK
242	Mary Foley	Cork		d15	Ireland
243	Marian Dodge	Los Angeles	CA	90027	US
244	Gerry Hans	Los Angeles	CA	90026	US
245	Jake Robbins	Los Angeles	CA	90023	US
246	Valérie PAILLARD	Savigny-le-temple		77176	France
247	Nina Beckhardt	New York	NY	10009	US
248	naomi cohen	Albrightsville	PA	18210	US
249	Shari Ranger	Ashland	OH	44805	US
250	Gerald Hallead	Traverse City	MI	49686	US
251	Andréa Branco	Sao Paulo		4110	Brazil
252	theo de wert	Best		65437	Netherlands
253	Gail Courtney	London		EC4A	UK
254	Nestor Berazategui	Maipú		5515	Argentina
255	Andre Ferro	Helmond		5707RN	Netherlands
256	Debbie Brent	Columbia	MD	21045	US
257	Lauri Kamiel	Thousand Oaks	CA	91362	US
258	Frances Mackiewicz	Beachwood	NJ	8722	US
259	Rachel Bunt	Madeira Park		VON 2H1	Canada
260	Lanny Toy	Alhambra	CA	91801	US
261	Patricia Huff	South Pasadena	CA	91030	US
262	Dominique Antoniaz	Angers		49100	France
263	Sabine Dahlhaus	Landscheid		58507	Germany
264	Fátima Minarello	Americana		13478260	Brazil
265	Freya Harris	Atlanta	GA	30342	US
266	Michael Mitchell	Canola Park	CA	91304	US
267	Luc Beaulieu	Montréal		H3G	Canada
268	Paata Kekutia	Batumi		6000	Georgia
269	NADINE GORGES	TULLINS	SC	38210	US
270	Tom McElvain	Pasadena	CA	91107	US
271	kathi king	moline	IL	61265	US
272	Ellen Pasternack	Santa Barbara	CA	93101	US
273	isabelle duviver	Santa Monica	CA	90405	US
274	Donata Dal cappello	Verona		37137	Italy
275	Deborah Bird	Los Angeles	CA	90071	US
276	Dawn L	Pottsville	PA	17901	US

	A	B	C	D	E
277	Barry Campion	Santa Monica	CA	90405	US
278	Dan De Yo	Yorba Linda		92886	US
279	Jeanne Brooks	London	OR	97759	US
280	Erin Gaffaney	Brooklyn Center		55429	US
281	Rafi Ibrahim	Cohoes		12047	US
282	Amy DeBauch	Gillett		54124	US
283	debbie loprete	staten island		10306	US
284	Amy Michele	Peachtree City		30269	US
285	Logan McCormack	San Antonio		78223	US
286	Aileen Glynn	Bronx		10463	US
287	Kentona Shipp				US
288	ANGELA DEMPSTER	New Rochelle	NY	10801	US
289	Angel Scott	South Holland		60473	US
290	Corey Meyers	Lakeland		33809	US
291	Raymond Cruz	Carolina		678	US
292	Zed Trick	Brooklyn	NY		US
293	Derek Gendvil	Las Vegas		89117	US
294	Zed Trick	Brooklyn	NY		US
295	M B	Los Angeles		90049	US
296	Katherine Gerg	Lacey		98503	US
297	Linda Freeman	Yuba City		95991	US
298	Trey Crawford	Colorado Springs		80903	US
299	Debbie E	Felton		19943	US
300	Tristan Hudson	Wilmington		19803	US
301	Iris Toth				US
302	Carniecia Ellison	Seattle		98166	US
303	Mya Wilkerson	Lakewood		98498	US
304	Mohammad Azari	Dallas		75270	US
305	Kimberly Traylor	Atlanta		30314-2009	US
306	Regina Brooks	Pittsburgh		15209	US
307	Cathy OByrne	Jacksonville	FL	32208	US
308	Brynne McHugh	Lancaster		17603	US
309	Natalie Freidberg	Los Angeles	CA	90004	US
310	Marc Huysmans	Edegem			Belgium
311	Jennifer Brent	Calabasas	CA	91302	US
312	Sara Graziosa	Canaan	CT	6018	US
313	christine marchand	marest dampcourt		2300	France
314	diana kolaski	Chicago	IL	60610	US
315	nadine richer	Nevers		58000	France
316	Aïcha Tabal	Strasbourg		67100	France
317	Jessica Coulon	Ceyrat		63122	Cape Verde
318	Kristina Sedic	Zagreb		10000	Croatia
319	Ryan Nicodemus	Los Angeles	CA	90028	US
320	MARIE-FRANCE PA	ARTHES		81160	France
321	Matthew Huff	South Pasadena	CA	91030	US
322	Joshua Curphey	Peterborough		PE7	US

	A	B	C	D	E
323	Chantal Derennesse	Los Angeles	CA	90066	US
324	Betsy Hunter	Los Angeles	CA	90020	US
325	Peregrine Whitehurst	Grass Valley	CA	95945	US
326	heidi mylo	Los Angeles	CA	90009	US
327	Jay Strehlow	Phoenix		85007	US
328	dani paolucci	TR		5100	Italy
329	Jelica Roland	Zagreb		10360	Croatia
330	Joan How	Luton	ENG	LU3 2PU	UK
331	Sarah Wauters	Marina del Rey	CA	90292	US
332	Larry Ladd	Chico		95928	US
333	Paola Torres	Los Angeles		90033	US
334	Catherine Van den Els	Bruxelles		1190	Belgium
335	M. Browning	Chandler		85224	US
336	Jocelyne Peiffer	Brussels		1000	Belgium
337	Hugh KENNY	LOS ANGELES	CA	90039	US
338	Diana Rodriguez	Kanab	UT	84741	US
339	Miriam Ranney	Los Angeles	CA	90006	US
340	Jeanne Eddy	Myrtle Creek	OR	97457	US
341	Colby Allerton	Redondo Beach	CA	90277	US
342	ava falah	lahijan			Iran
343	G. Diane Matthews-M	Carson		90746	US
344	Sarah Earl	Lansdale	PA	19446	US
345	Anastasia Walker	Street		21154	US
346	John Vangelisti	Los Angeles	CA	90012	US
347	Nikki Brown	Kansas City	KS	66103	US
348	Rachel Canon	Woodland Hills	CA	91364	US
349	Jodi Igard	Studio City	CA	91607	US
350	Loretta Ramos	Los Angeles	CA	90006	US
351	Jesseca Harvey	Los Angeles	CA	90038	US
352	Polly Estabrook	Los Angeles	CA	90004	US
353	Alexandria mancao	los angeles		90042	US
354	NICOLE RIERA	Robion Vacluse		84440	Russia
355	Anna Laidler	East Stroudsburg		18301	US
356	Elaina Dowell	Saint Johns		48879	US
357	Anthony Scrimenti	Guilderland		12084	US
358	Skeleton Key	Los Angeles	CA		US
359	Dancing Ass		CA		US
360	James Rice	Acworth	GA	30102	US
361	Joline Sattarelle	Poland	OH	44514	US
362	Brian Haig	Los Angeles	CA	90060	US
363	Hunter Dunn	Pasadena	CA	91107	US
364	Charli Rou	Los Angeles	CA	90066	US
365	Rhonda Plank-Richard	Los Angeles	CA	90006	US
366	Kiersten Cluster	Los Angeles	CA		US
367	Riley Haythorn	Inglewood	CA	90305	US
368	Wendy Katagi	Palos Verdes Estates	CA	90274	US

	A	B	C	D	E
369	Daniel Stockel	Los Angeles	CA	90009	US
370	jessie schiewe	Los Angeles	CA	90041	US
371	Rhiannon Mulkerrins	Staten Island		10309	US
372	Nicolle Ruiz	Panama City		32405	US
373	Carro Reyes	San Diego		92105	US
374	Cassandra Rosales	Long Beach		90813	US
375	Aileen Milliman	Long Beach	CA	90802	US
376	Tiffany Adorno	Encino	CA	91436	US
377	Gordon Poston	Kingstree		29556	US
378	Andrew Florez	Flushing		11367	US
379	DHAVAL PATEL				US
380	Talycia Crawford	Detroit		48238	US
381	nereyda hernandez	Goodyear		85338	US
382	G. M.	New Bern		28560	US
383	Priya Gupta	14708 NE 13th Ct	Vancouver	98685	US
384	Rudy Martinez	Alhambra	CA	91803	US
385	Salma Valenzuela	Mission Viejo	CA	92691	US
386	Terri Middlemiss	Inyokern	CA	93527	US
387	Remy Baruch	Los Angeles	CA	90046	US
388	Tessa Charnofsky	Canoga Park	CA	91303	US
389	Jane Bicek	San Jose	CA	95127	US
390	Andrea Sosa	San Pablo	CA	94806	US
391	Nancy Larsen	Danville	CA	94506	US
392	Tom Maendle	San Rafael	CA	94901	US
393	Stacey Sklute	Los Angeles	CA	90034	US
394	Divya Nagendran	Aurora		60505	US
395	Brandi L	Bowie		20716	US
396	The Glee Club				US
397	Andrew Floyd				US
398	Abid Amiri	Washington		20307	US
399	Elena Thornton	Chattanooga		37412	US
400	anna kurihara	north hollywood	CA	91605	US
401	Pitagord Lucien	Miami		33164	US
402	Isabelle Johnson	Lincoln		68523	US
403	Rita Thio	Walnut	CA	91789	US
404	Etc Foreigners	Summerville		29485	US
405	Georgia O'Connell				US
406	ray ross	Ridgefield Park		7660	US
407	Kym Heller	Tampa	FL	33615	US
408	Priscilla Rouse	Bristol		37620	US
409	Ivy McCourt	Morgantown		26301	US
410	Carlos Alfonso	Vero Beach		32963	US
411	Andria Califf	Poway	CA	92064	US
412	teresa lake	klamath falls	OR	97603	US
413	Shelton Hardy	Denver		80230	US
414	John Monsen	Laguna Woods	CA	92637	US

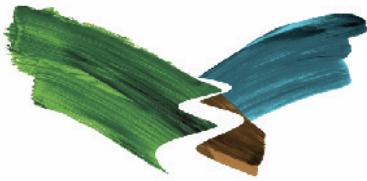
Communication from Public

Name: Bel Air Hills Association

Date Submitted: 06/19/2023 04:12 PM

Council File No: 14-0518

Comments for Public Posting: Please see the attached correspondence from the Bel Air Hills Association, a neighborhood association representing approximately 950 homes located within the proposed Wildlife Ordinance District, objecting to the proposed Wildlife Ordinance. We have devoted a great deal of time, consideration, and research to our letter. We would appreciate it if you would give it the attention and consideration that the residents of the proposed Wildlife Ordinance District deserve. This attached correspondence is intended to be communicated to the Members of the PLUM Committee for their consideration in their upcoming consideration of the Wildlife Ordinance at their June 20th meeting, as well as to all other Los Angeles governmental officials and entities associated with the Wildlife Ordinance. Please make the attached correspondence part of your official file on the Wildlife Ordinance. Sincerely, Patricia Templeton Bel Air Hills Association President



June 19th, 2023

Via Email and Messenger

Los Angeles City Council, PLUM Committee, and Los Angeles City Planning

RE: THE PROPOSED DRAFT WILDLIFE ORDINANCE (CF 14-0518)

Dear Honorable Members and Los Angeles City Planning Staff,

The Bel Air Hills Association represents approximately 950 homes located within the proposed Wildlife Supplemental Use District (“WLD”). Bel Air Hills is a fully developed and well-established neighborhood, whose homes are primarily smaller 1950’s ranch homes on large steep lots with small building pads.

While we recognize the need for protection of Wildlife and Biodiversity and would welcome a well-designed Wildlife Ordinance founded on scientific research, **we do not support *this Wildlife Ordinance*** as it is neither of those.

We urge the PLUM Committee, the City Council, and the Planning Department to respect the will of the affected residents of the proposed WLD, who overwhelmingly oppose the Wildlife Ordinance in its current incarnation, as evidenced by their comments submitted to the Planning Department and the City Planning Commission.

We would strongly prefer that the PLUM Committee reject the current incarnation of the Wildlife Ordinance in its entirety, and direct City Planning to draft a Wildlife Ordinance that relies upon scientific research to better protect Wildlife and Biodiversity without unduly burdening the ordinary homeowner. However, if that will not be done, we wish to express our vehement opposition to the following regulations contained in the current proposed Wildlife Ordinance, and in Councilmembers Yaroslavsky’s and Ramen’s letter to the PLUM Committee. These concerns, and others, have been previously communicated in our letters to the Planning Department (dated July 28th, 2022) and the City Planning Commission (dated November 14th, 2022).

1. **WE VEHEMENTLY OPPOSE** the failure of the Wildlife Ordinance to promulgate different regulations for undeveloped/pristine lots and those lots which have already been developed.

This failure results in insufficient protections for undeveloped/ pristine land of high habitat and/or biodiversity value, combined with overly burdensome regulation of homes on already developed parcels that have limited habitat or biodiversity value.

2. **WE VEHEMENTLY OPPOSE** the proposal put forth by Councilmembers Yaroslavsky and Ramen to reinstate the disallowance of RFA for slopes greater than 60% (aka 31 degrees) contained in Version 2 of the Wildlife Ordinance.

This proposal for a blanket reduction in allowed home size on steeper lots is a classic example of regulatory overkill.

Simply put, there is no nexus between home size, slope steepness, and wildlife habitat destruction where the home is on an already developed parcel with an existing pad, as is the case of the majority of homes in the WLD. Absent additional grading, which is already regulated under other sections of the Wildlife Ordinance, this reduction in allowable home size severely negatively impacts homeowners while providing minimal benefit to wildlife or biodiversity.

Most homes in our neighborhood have slopes greater than 60% (31 degrees), and most of these homes are relatively small in size. Reducing allowable home size for the majority of our residents will prevent needed increases in home size to accommodate growing families, aging parents, and home offices for remote work. The larger homes that exist in our community will be rendered non-conforming, with the attendant mortgage and insurance difficulties.

Moreover, this heavy-handed reduction in allowable home size would only worsen the City's housing shortage. The California Department of Housing & Community Development (HCD) has already warned the City that reducing RFA below its current level would likely violate California Government Code Section 66300, subdivision (b)(1)(A).

3. **WE VEHEMENTLY OPPOSE** the regulation in **Section E(1)(b)** which defines additions of greater than 500sf as a Project under the Wildlife Ordinance.

This 500sf threshold is entirely too low and is applied regardless of the size of the existing home. As a result, it unreasonably burdens the owners of smaller, older homes, such as those that constitute the majority of homes in our neighborhood. Additionally, it encourages homeowners who need more space to sell their homes rather than enlarge them, which is not only detrimental to neighborhood cohesiveness but also has the presumably unintended consequence of increasing the risk that the homes will be bought by developers who will build the largest home they can. At a minimum, additions that would result in homes of less than 3,500sf or 75% of allowed RFA should be exempted from this regulation.

4. **WE VEHEMENTLY OPPOSE** the regulation in **Section E(1)(c)** which defines Major Remodels as a Project under the Wildlife Ordinance.

Homeowners with smaller, older homes, similar to most in our neighborhood, will face an unjustifiable burden due to the applicability of the Major Remodel threshold. Bringing these homes up to current standards and building codes significantly increases the likelihood of exceeding the Major Remodel threshold. Consequently, it is crucial to exempt owner-occupied homes of a certain age from this category of Project.

5. **WE VEHEMENTLY OPPOSE** the requirement in **Section E(1)(e)** and **Section F.1(f)**, as to non-native trees only, that 2 new trees be planted for the removal of each non-native Significant (aka large) tree.

This regulation poses a significant fire hazard. Section 4906.4.2 of the 2023 California Fire Code (presumably to be adopted by the City in the near future) requires that the dripline at maturity of any newly planted trees be at least 10 feet away from structures and the dripline of other trees. By requiring a two-for-one tree replacement for the removal of large non-indigenous trees, this regulation would require homeowners with small building pads to plant trees that will violate best fire safety practices and fire regulations, or on steeper parts of the property where they cannot be readily maintained in a fire-safe manner.

Further, the native flora in the WLD is primarily chaparral - large native trees are generally only found in riparian areas. While there are many parts of Los Angeles that are in need of additional trees, the WLD is not one of them. A far better approach would be to require homeowners who remove large non-native trees to contribute to a fund dedicated to providing trees to areas where such trees are actually needed, and where they would not be public safety hazard, or jeopardize a homeowners ability to obtain fire insurance.

Additionally, both the increased fire danger (and the increased bird strikes, as noted in the City's own PAWS report) resulting from this regulation would disallow a CEQA exemption for this Ordinance.

6. **WE VEHEMENTLY OPPOSE** the requirement in **Section F.1(f)**, as to non-native trees only, that prohibits grading or construction within the dripline of a Significant (aka large) tree.

Where the dripline of a large non-native tree extends over a home, this regulation would unreasonably interfere with homeowners' ability to remodel their homes. Furthermore, as previously stated, the WLD does not require protection for non-native trees, making this requirement both unnecessary and burdensome..

7. **WE VEHEMENTLY OPPOSE** the requirement in **Section F.1(j)** that requires trash cans to be stored in a building or special enclosure.

According to the Los Angeles Municipal Code (LAMC) and the Planning Department, these trash can enclosures would be considered structures and thus prohibited in side and front setback areas. Consequently, they would need to be situated in the central portion of homeowners' backyards. Most homes in our neighborhood are on small pads with small or non-existent back yards, and some back yards are only reachable by stairs. Having odorous and unsightly trash cans enclosures in the middle of our small back yards is untenable, as is dragging them up and down stairs - especially for the elderly or disabled. Storing odorous, insect-attracting trash cans in the garage is equally unacceptable.

Additionally, given that Wildlife intrusion into trash cans stored behind fences on homeowners' properties is extremely rare, and that Wildlife resistant latches are readily available for under \$20, this regulation is wholly unreasonable.

8. **WE VEHEMENTLY OPPOSE** the requirement in **Section F.1(j)** for Site Plan Review for homes resulting in greater than 6,000sf.

The 6,000sf threshold is too low. The Planning Department has stated that the *average* new/rebuilt home in the WLD is over 6,000sf, consequently this regulation would require that the *majority* of new/rebuilt homes undergo Site Plan Review.

9. **WE VEHEMENTLY OPPOSE** the failure of **Section H.3** to provide for a simplified review process in cases where a Resource is erroneously mapped and does not actually exist in the mapped location and/or where it is clear that the Project would have a negligible impact on the Resource.

The Planning Department has not verified that the Resources are accurately mapped, and the Wildlife Ordinance unreasonably shifts this burden to the homeowner at the significant expense and difficult of a Site Plan Review and Biological Assessment. See Exhibit 1 for examples.

10. **WE VEHEMENTLY OPPOSE** the failure of **Section E.1** to exclude homes destroyed by casualties other than natural disasters (e.g. cooking or electrical fires) from the Wildlife Ordinance regulations.

This failure is entirely unreasonable and will result in homeowners having difficulty obtaining mortgages or refinancing.

11. **WE VEHEMENTLY OPPOSE** the failure of **F.1(e)(2)** to utilize R1 and R2 Zoning rather than lot size in determining which parcels are subject to the Wildlife Ordinance's Lot Coverage regulations, and to give an overly generous Lot Coverage allowance to large parcels.

Many RE zoned homes in the WLD are on lots that are smaller than R1/R2 lots. Our neighborhood, although zoned primarily RE-15, has several such lots (e.g. lots of

6,000sf - 7000sf) and these homeowners would be greatly burdened by the application of a 50% Lot Coverage limit to their properties.

This burden on homeowners of smaller parcels is especially galling in the face of the absolute gift to developers of mega-mansions of up to 100,000sf of Lot Coverage for larger parcels. It is these mega-mansion Projects that have a negative impact on Wildlife and Biodiversity, not the small parcel home.

12. **WE VEHEMENTLY OPPOSE** the regulation in **Section F.1(c)(2)(i)(a)** to the extent that it would prohibit stairs and decks on slopes greater than 100% (aka 45 degrees).

Prohibiting stairs on these slopes creates a public safety hazard. Prohibiting stairs would render it difficult/dangerous for property owners to reach areas of their property for brush clearance and other property maintenance. Further, this regulation restricts homeowners' access to their own property, and as such constitutes a taking.

Many homes on steeper slopes have very small flat pads and are in neighborhoods with no sidewalks and limited access to recreational areas. Decks provide the opportunity for outdoor living space while leaving the land below the deck available for use by wildlife.

13. **WE VEHEMENTLY OPPOSE** Councilmembers Yaroslavsky's and Ramen's proposal to revert to Version 2's inclusion of non-Open Space designated City-owned vacant land in the definition of Open Space.

Per the Planning Department, this change would place Resource Buffers on approximately 1000 adjacent parcels, requiring the owners of those adjacent parcels to undergo expensive and time-consuming Site Plan Review for Projects. The mere fact that the City owns the unimproved parcel does not justify this result, especially where the City itself has declined to designate the parcel as Open Space.

We sincerely hope that the above explanation of the impacts of just some of the proposed regulations makes clear that the current version of the Wildlife Ordinance is deeply flawed.

Sincerely,

Patricia Templeton

Patricia Templeton, President,

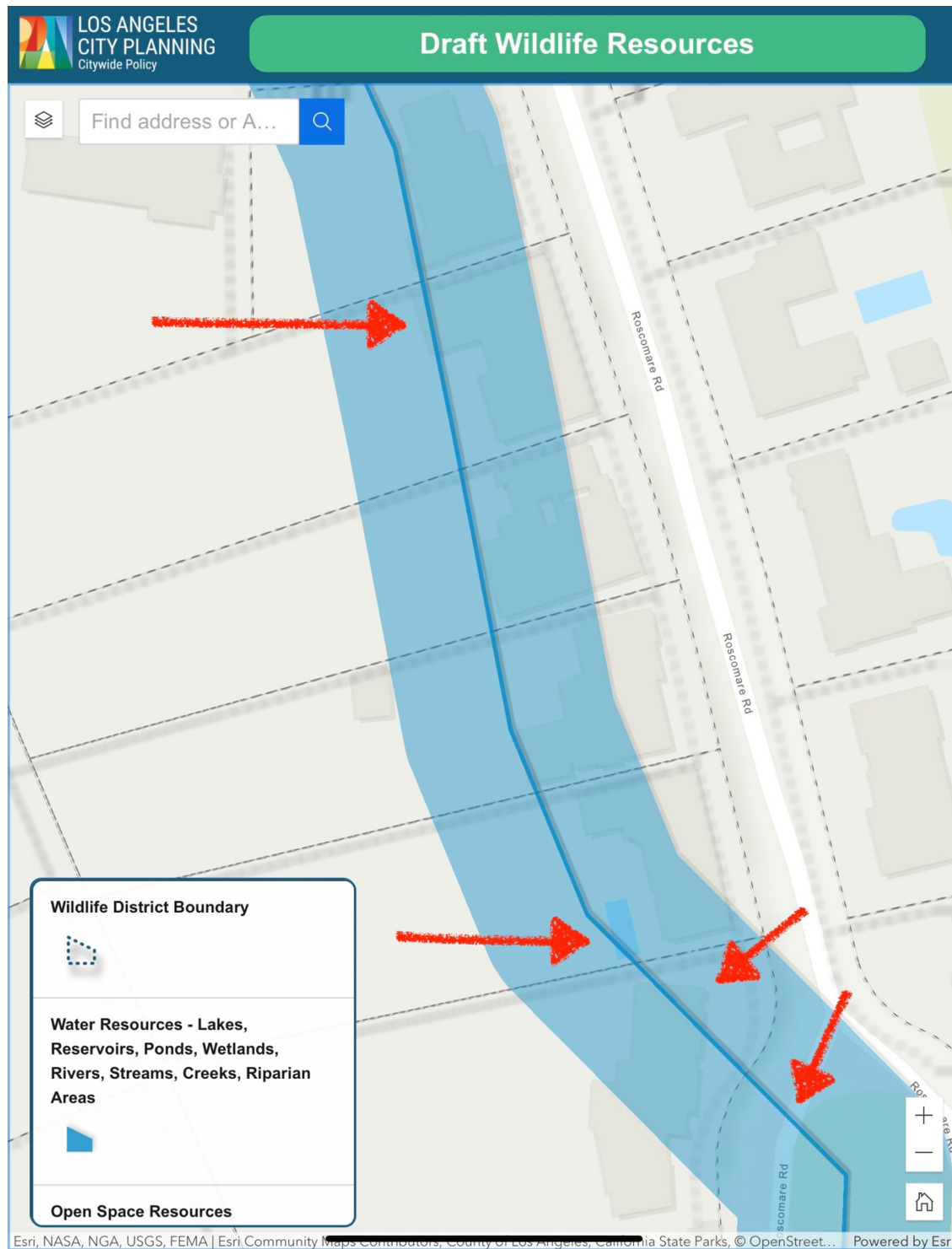
For the Board of Directors of the Bel Air Hills Association

Exhibit 1

Example of Erroneous Wildlife Resource in Bel Air Hills,
depicting stream traversing homes, pools, and Roscomare Road.

The Wildlife Resource so depicted does not exist.

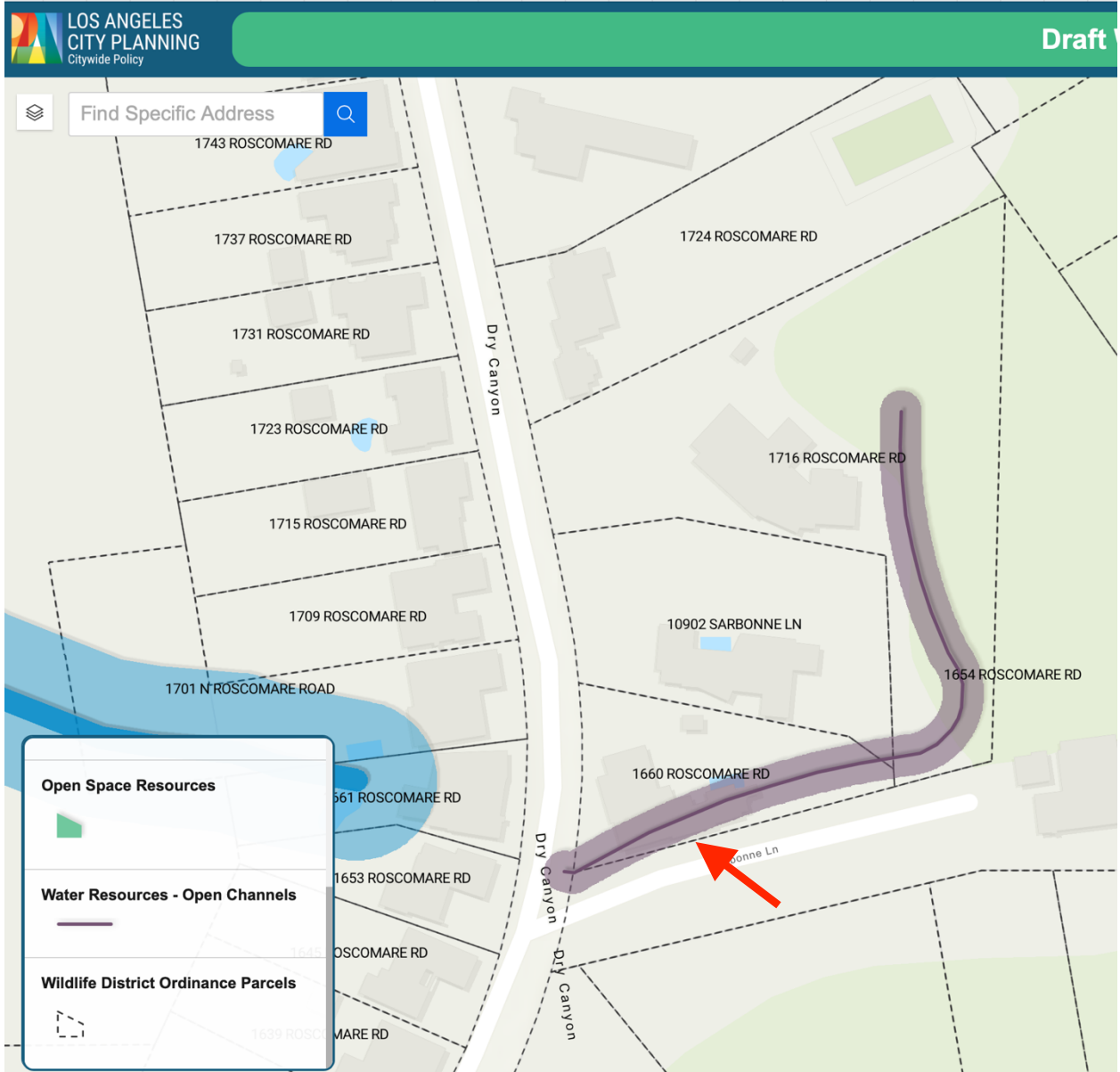
Source: Current Planning Department Wildlife Resource Map, captured on November 14th, 2022



Example of Erroneous Wildlife Resource in Bel Air Hills,
depicting an Open Channel running through the side of a home.

The Wildlife Resource so depicted does not exist.

Source: Current Planning Department Wildlife Resource Map, captured on June 19th, 2023



Communication from Public

Name: Marian Dodge
Date Submitted: 06/19/2023 04:15 PM
Council File No: 14-0518
Comments for Public Posting: Wildlife Ordinance - SUPPORT

P.O. Box 27404
Los Angeles, CA 90027
www.hillsidefederation.org



PRESIDENT
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Marian Dodge
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Jamie Hall
SECRETARY
Robin Greenberg
TREASURER
Don Andres

PLUM Committee
City Hall
200 N. Spring Street
Los Angeles, CA 90012

via email

June 19, 2023

**Re: #19 CF 14-0518
Wildlife Ordinance SUPPORT**

Dear PLUM Committee:

The Hillside Federation which represents 47 resident associations spanning the Santa Monica Mountains has supported a Wildlife Ordinance since 2014. A few simple modifications to new construction design in the Supplemental Use District will assure that wildlife continues to be able to move across our hillsides and does not become isolated. The cumulative effect of many people making small changes will have a great impact on wildlife's ability to survive and thrive.

Since the arrival of P-22 in Griffith Park more than a decade ago, the people of Los Angeles have shown an increased appreciation for the wildlife in their own backyard. P-22's death late last year only increased their resolve. They have learned the benefits of co-existing with wildlife.

The Hillside Federation strongly urges you to approve the Wildlife Ordinance today.

Sincerely,

Charley Mims

Argyle Civic Assn.
Beachwood Canyon NA
Bel-Air Assn.
Bel-Air Hills Assn.
Bel Air Knolls Property Owners
Bel Air Skycrest Property Owners
Benedict Canyon Association
Brentwood Hills Homeowners
Brentwood Residents Coalition
Cahuenga Pass Property Owners
Canyon Back Alliance
Crests Neighborhood Assn.
Dixie Canyon Assn.
Doheny-Sunset Plaza NA
Franklin/Hollywood West Res.
Franklin Hills Residents Assn.
Friends of Walnut Canyon
Highlands Owners Assn.
Hollywood Dell Civic Assn.
Hollywood Heights Assn.
Hollywoodland HOA
Holmby Hills Homeowners Assn.
Kagel Canyon Civic Assn.
Lake Hollywood HOA
Laurel Canyon Assn.
LFIA (Los Feliz)
Mountaingate
Mt. Olympus Property Owners
Mt. Washington Homeowners All.
Nichols Canyon NA
Oak Forest Canyon HOA
Oaks Homeowners Assn.
Outpost Estates HOA
Pacific Palisades Res. Assn.
Residents of Beverly Glen
Save Coldwater Canyon!
Save Our Canyon
Shadow Hills POA
Sherman Oaks HOA
Silver Lake Heritage Trust
Studio City Residents Assn.
Sunset Hills HOA
Sunshine Hills Residents Assn.
Tarzana POA
Upper Mandeville Canyon Assn.
Upper Nichols Canyon NA
Whitley Heights Civic Assn.

Communication from Public

Name: Benedict Canyon Association

Date Submitted: 06/19/2023 04:51 PM

Council File No: 14-0518

Comments for Public Posting: Dear PLUM Committee Members, On behalf of the Board of the Benedict Canyon Association, we would like to thank the Committee for its diligence in reviewing the proposed Wildlife Ordinance. We have reviewed the attached Bel-Air Beverly Crest Neighborhood Council's analysis of the Ordinance, and feel that its suggestions to PLUM fairly balance the interests of homeowners in the proposed Zone with protecting the habitat and strongly urge you to incorporate the BABCNC's recommendations. Thank you, David Kadin, President of the Benedict Canyon Association



VIA EMAIL (patrick.whalen@lacity.org, cpc@lacity.org)

November 14, 2022

City Planning Commission
City of Los Angeles

Re: November 17, 2022, Items 9 & 10. CPC-2022-3413-CA, CPC-2022-3712-ZC, and ENV-2022-3414-CE

Dear President Millman and Commissioners:

The Bel Air-Beverly Crest Neighborhood Council was established in 2002 and has for 20 years served as the venue for coordination and cooperation across the community of interest that it serves. We are organized to represent the hillside communities stretching from Laurel Canyon to Sepulveda Boulevard, and from Sunset Boulevard to Mulholland Drive.

With the release of this new draft, the Bel Air-Beverly Crest Neighborhood Council (“Council”) continued our thorough process of reviewing the proposed Wildlife District Ordinance (“Ordinance”), meeting on the new draft for ten hours over five meetings, on the previous draft for well over twenty hours in fifteen meetings and hearing many hours of public comments. Further, many previous meetings were held by committees on the previous draft of the wildlife ordinance as well as on the previous draft of the ridgeline ordinance. The Council continued to receive both comments in support of and opposition to the Ordinance after its revision. Minutes of meetings contain all comments and completed minutes are attached will be posted to the Council’s website.

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Vice President – Operations
Robin Greenberg
Vice President – Leg. Affairs
Jamie Hall
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Nicole Miner
Treasurer
Vadim Levotman

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Planning and Land Use – **Robert Schlesinger**
Bylaws, Rules and Elections – **Cathy Wayne**
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Outreach – **Andre Stojka**
Traffic Committee – **Irene Sandler**
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Timothy Steele, Ph.D.
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Bel Air Association
Bel-Air Crest Master Association
Bel Air Hills Association
Bel Air Ridge Association
Benedict Canyon Association
Casiano Estates Association
Doheny-Sunset Plaza Neighborhood Assn.
Holmby Hills Homeowners Association
Laurel Canyon Association
Residents of Beverly Glen

RESIDENTIAL DISTRICTS

Bel Air District
Bel Air Glen District
Franklin-Coldwater District
North of Sunset District

NON-RESIDENTIAL REPRESENTATION

At-Large Members
Commercial or Office Enterprise Districts
Custodians of Open Space
Faith-Based Institutions
Public Schools & Private Schools

Our aim in reviewing the ordinance has once again been to ensure that the focus of the ordinance is on protecting the most valuable resources, and on balancing that protection with legitimate desires to safeguard property interests. The current draft greatly reduces disparities present in the previous draft. The Council appreciates Planning staff's responsiveness to the comments of the community, and the Council applauds many of the changes in the ordinance - the application of site plan review to projects resulting in 7,500 square feet of residential floor area, the addition of "overall height" for the entire district and the reduction in number of small projects subject to site plan review. The Council also appreciates the clarifications regarding which district-wide regulations are triggered and when, and the ability to rebuild after a disaster.

Addition of "Habitat Triggers" for Site Plan Review

Changes in the new draft have succeeded in lessening the potential burden on owners of smaller lots. What the new draft has not successfully achieved is ensuring that the development projects that are most likely to result in substantial loss to wildlife habitat are subjected to Site Plan Review — where a more focused, site-specific analysis can be undertaken to ensure that landform alteration is minimized, impacts to biotic resources reduced and project modifications considered. The Council is therefore requesting the addition of "habitat triggers" for Site Plan Review.

Currently, there are only three triggers for Site Plan Review in the Ordinance, which include the following: (1) 1,000 cubic yards or more of remedial grading, (2) homes of 7500 square feet or larger and (3) building within a Wildlife Resource or buffer. Unfortunately, Site Plan Review will not be triggered for most development projects that result in habitat loss. This is because the City has too narrowly defined "Wildlife Resource" to include only zoned or protected open space and water resources. See Table 7.2. Development can occur via this Ordinance that will result in significant habitat loss to protected species and native woodlands without ever triggering Site Plan Review. This is a problem. Substantial swaths of high-value habitat exist on large, undeveloped lots in the Pilot Study Area and the Council strongly contends that the development of these lots should be subject to Site Plan Review. Preventing habitat loss is a critical function of any wildlife ordinance and inclusion of a habitat trigger for Site Plan Review makes perfect sense.

The Council suggests four potential "habitat triggers" (which would only apply to *undeveloped* lots). They could include the following:

- Placement of lot in a Santa Monica Mountains Conservancy ("SMMC") mapped "habitat block"
- Presence of National Park Service (NPS") mapped native woodlands
- Presence of "habitat for protected species" per Govt Code. Section 65913.4(a)(6)(J)

- Proposed removal of 3 or more protected or significant trees

The necessary mapping that would allow the application of these rules is already available and adding these triggers would ensure that the development on lots with high value habitat value be done with sensitivity towards the preservation of that habitat. Site Plan Review captured by this habitat trigger will be targeted to those types of development projects that truly warrant the site-specific analysis warranted by Site Plan Review. Again, the Council suggests that this be limited to undeveloped lots based on the comments received from the public. We further request that a *de minimus* exception be incorporated that allows exemption for projects that clearly have no impact on the sensitive resources.

***De Minimus* Review Process for Site Plan Review**

While the removal of site plan review for all lots with biological resources or resource buffers on the lot has lessened the possibility that a homeowner will be required to undergo site plan review when resources are not going to be affected, there are still lots where a resources may be mapped but may not really exist as well as instances where a resource takes up the majority of a very small lot that has already been developed. Small lots on Beverly Glen, where there is a mapped but theoretical stream running along the street, come to mind, as well as lots where a water resource is mapped as running through an existing building.

Because currently available mapping is fallible, it is critical that a *de minimus* review process be made available, particularly for lots where the cost and burden of undergoing site plan review is substantial compared to the value of the structure being proposed.

Definitions

The previous definition of open space should be restored. Staff has removed a key sentence in the definition of Open Space, which stated as follows: “*Open Space shall also include City owned vacant land that, while not zoned as Open Space, meets the criteria above.*” See page 7. The City owns remnant vacant parcels in the Pilot Study Area that are not being used and currently exist as open space and contain important habitat for wildlife. There is no legitimate reason for City-owned land that meets the criteria for being considered open space from being exempted from the definition of “open space” and therefore exempted from Site Plan Review and protective buffers.

Fencing

While the Council appreciates that the community had a number of concerns about the Wildlife-Friendly Fencing standards in the previous draft of the ordinance, removal seems to significantly

Re: Proposed Wildlife District Ordinance

lessen the potential impact of the ordinance on wildlife movement and connectivity. BABCNC would like to see the following added to the ordinance for undeveloped lots *only*:

- For new single-family dwellings proposed for lots greater than ½ an acre, perimeter fencing must be appropriately set back and permeable to allow wildlife to pass through. Interior fencing may be impermeable.

Height

Again, the Council appreciates the application of an overall height standard district-wide. The Council notes that 45 feet is extremely generous, therefore all roof structures should be included in this measurement.

Residential Floor Area

This rule should apply to Additions as well. Covered parking over the required amount should not be exempt from this calculation.

Lot Coverage

Changes in lot coverage requirements show a much-appreciated sensitivity to burdens for owners of smaller lots. The Council continues to recommend that lot coverage percent be adjusted according to lot size.

The maximum lot coverage amount should be 25,000 square feet, not 100,000 which far exceeds what might be necessary for residential purposes.

Trees

These regulations should apply to all project types. Staff should be able to exempt projects from this regulation should there not be room to plant required additional trees on the lot. The entity responsible for determining the health of a tree should be the Urban Forestry Division. Furthermore, these regulations should not apply where homeowner's insurance companies are requiring the removal of trees as a condition of coverage.

Lighting

Multi-colored LED lights illuminating structures should not be permitted.

Re: Proposed Wildlife District Ordinance

Further, it is critical that the limits on lighting be per unit of area not per fixture. Light effects are cumulative and a lumen limit per fixture would potentially just result in a greater number of fixtures to achieve a lighting level that continues to be harmful for wildlife.

The following previous recommendations should be looked at for inclusion in any subsequent draft of the ordinance:

- That all lights be fully shielded to eliminate upward emissions.
- That security lighting be motion activated and not be constantly illuminated.
- That a curfew be set for both recreational and landscape lighting
- That the definition for “recreational lighting” be provided in the definition section.

Trash Enclosures

BABCNC would like clarification on the definition of “enclosure.” Further, the enclosure should be allowed to encroach on the front or side yard setback to the extent that it does not interfere with access necessary for firefighting. Trash enclosures should be constructed of any non-flammable material.

Site Plan Review

Projects requesting 500 cubic yards or more of remedial grading should be subject to site plan review.

Clearly articulated *objective* criteria should be added to the subjective criteria currently articulated for site plan review.

The following comments from our previous letter should be closely considered for any further revisions in the draft ordinance:

Grading

Grading permits shall *not* be issued prior to building permit issuance for a structure, and proposed structures must be sited on the lot such that grading is minimized.

Windows

Strike the current standards and use the following instead:

Re: Proposed Wildlife District Ordinance

- Windows shall conform to the standards set forth in California Code of Regulations, Title 24.
- Treatments should not have a threat factor exceeding 30 in the American Bird Conservancy Products and Solutions database for Glass Collisions.

Slope Development Restrictions

An exemption to the limit on development on slopes greater than 100% should be made for stairs.

Rebuilding After Loss

The ordinance should explicitly allow rebuilding for non-disaster related complete losses (e.g., house fire) by stating that “Reconstruction of a building or structure damaged or destroyed in a natural disaster or casualty loss shall not be considered new construction nor major remodel”.

Public Input

We strongly recommend that the City Planning Commission provide adequate opportunity and time for all members of the public to comment on the proposed ordinance during its meeting.

Conclusion

While the new draft of the Wildlife Ordinance greatly reduces undesirable consequences resulting from the ordinance, critical measures still need to be taken to ensure habitat protection. We urge the Planning Department, the City Planning Commission, and our elected decision makers to carefully consider our recommendations. We look forward to working with you as this legislative process continues.

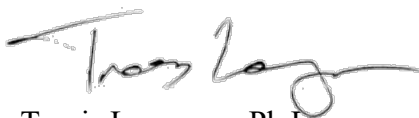
Sincerely,



Ellen Evans
Chair, Ad Hoc Subcommittee on Wildlife District



Jamie Hall
Vice President – Legislative Affairs



Travis Longcore, Ph.D.
President

Communication from Public

Name: Friends of Griffith Park
Date Submitted: 06/19/2023 04:54 PM
Council File No: 14-0518
Comments for Public Posting: Please see comment letter in Strong Support of the Wildlife District Ordinance



Friends of Griffith Park

P.O. Box 27573

Los Angeles, CA 90027-0573

friendsofgriffithpark.org

June 17, 2023

Honorable Marqueece Harris-Dawson
and Planning & Land Use Committee Members
Via email & CF 14-0518 submission

RE: Strong Support for Wildlife Ordinance

Dear Chair Harris-Dawson and Councilmembers:

Friends of Griffith Park (FoGP) continues its strong support of the Los Angeles Wildlife District Ordinance at this long-awaited stage of the approval process. We also look forward to its swift implementation beyond the pilot area, extending the protection into the identified hillsides of Protection Areas for Wildlife (PAWS).

FoGP supports the astute amendment recommendations provided by Councilmembers Raman and Yaroslavsky. We would add that the currently proposed 25-foot buffer is not adequate where a property is adjacent to a 25(or more)-foot road. To accommodate for this occurrence, either the road's width should not count in the buffer measurement, **or** the 25-foot buffer should be increased to 35-50 feet. Otherwise, Site Plan Review would not be triggered when it is needed, for example, across the road or street from an open space parcel.

There is no time left to lose. This is a critical step in preserving biodiversity in the Los Angeles region, by protecting important habitat and connectivity.

As Griffith Park is the eastern terminus of the majestic Santa Monica Mountain Range, we appreciate the continuity of rich natural resources extending from the Pacific Coastline far into the City's urban sprawl. While these mountains have been widely developed over the last century, the remaining connectivity they afford to wildlife makes urban living healthier and enjoyable for all Angelenos.

We commend City Planning's commitment to the biological analysis, the vast amount of outreach, and the enlightened implementation this Ordinance. In doing so, Los Angeles is taking substantial action in the City's future as a biodiverse, yet huge, urban area.

Sincerely,

Gerry Hans, President

Communication from Public

Name: John Bjerke

Date Submitted: 06/19/2023 09:45 PM

Council File No: 14-0518

Comments for Public Posting: I live within the proposed Wildlife Supplemental Use District (“WLD”), a fully developed and well-established neighborhood, whose homes are primarily smaller 1950’s ranch homes on large steep lots with small building pads. While I recognize the need for protection of Wildlife and Biodiversity and would welcome a well-designed Wildlife Ordinance founded on scientific research, I do not support this Wildlife Ordinance as it is neither of those. I urge the PLUM Committee, the City Council, and the Planning Department to respect the will of the affected residents of the proposed WLD, who overwhelmingly oppose the Wildlife Ordinance in its current incarnation, as evidenced by their comments submitted to the Planning Department and the City Planning Commission. I would strongly prefer that the PLUM Committee reject the current incarnation of the Wildlife Ordinance in its entirety, and direct City Planning to draft a Wildlife Ordinance that relies upon scientific research to better protect Wildlife and Biodiversity without unduly burdening the ordinary homeowner. However, if that will not be done, I wish to express my vehement opposition to the following regulations contained in the current proposed Wildlife Ordinance, and in Councilmembers Yaroslavsky’s and Ramen’s letter to the PLUM Committee. ----- Additional details are in the attached document. ----- 1. I OPPOSE the failure of the Wildlife Ordinance to promote different regulations for undeveloped/pristine lots and those lots which have already been developed. This failure results in insufficient protections for undeveloped/ pristine land of high habitat and/or biodiversity value, combined with overly burdensome regulation of homes on already developed parcels that have limited habitat or biodiversity value. 2. I OPPOSE the proposal put forth by Councilmembers Yaroslavsky and Ramen to reinstate the disallowance of RFA for slopes greater than 60% (aka 31 degrees) contained in Version 2 of the Wildlife Ordinance. This proposal for a blanket reduction in allowed home size on steeper lots is a classic example of regulatory overkill. There is no connection between home size, slope steepness, and wildlife habitat destruction where the home is on an already developed parcel with an existing pad, as is the case of the majority of homes in the WLD. This reduction in allowable home size severely negatively impacts homeowners

while providing minimal benefit to wildlife or biodiversity. Most homes in my neighborhood have slopes greater than 60% (31 degrees), and most of these homes are relatively small in size. 3. I OPPOSE the regulation in Section E(1)(b) which defines additions of greater than 500sf as a Project under the Wildlife Ordinance. 4. I OPPOSE the regulation in Section E(1)(c) which defines Major Remodels as a Project under the Wildlife Ordinance. 5. I OPPOSE the requirement in Section E(1)(e) and Section F.1(f), as to non-native trees only, that 2 new trees be planted for the removal of each non-native Significant (aka large) tree. 6. I OPPOSE the requirement in Section F.1(f), as to non-native trees only, that prohibits grading or construction within the dripline of a Significant (aka large) tree. 7. I OPPOSE the requirement in Section Section F.1(j) that requires trash cans to be stored in a building or special enclosure. 8. I OPPOSE the requirement in Section F.1(j) for Site Plan Review for homes resulting in greater than 6,000sf. The 6,000sf threshold is too low. 9. I OPPOSE the failure of Section H.3 to provide for a simplified review process in cases where a Resource is erroneously mapped and does not actually exist in the mapped location and/or where it is clear that the Project would have a negligible impact on the Resource. 10. I OPPOSE the failure of Section E.1 to exclude homes destroyed by casualties other than natural disasters (e.g. cooking or electrical fires) from the Wildlife Ordinance regulations. This failure is entirely unreasonable and will result in homeowners having difficulty obtaining mortgages or refinancing. 11. I OPPOSE the failure of F.1(e)(2) to utilize R1 and R2 Zoning rather than lot size in determining which parcels are subject to the Wildlife Ordinance's Lot Coverage regulations, and to give an overly generous Lot Coverage allowance to large parcels. 12. I OPPOSE the regulation in Section F.1(c)(2)(i)(a) to the extent that it would prohibit stairs and decks on slopes greater than 100% (aka 45 degrees). 13. I OPPOSE Councilmembers Yaroslavsky's and Ramen's proposal to revert to Version 2's inclusion of non-Open Space designated City-owned vacant land in the definition of Open Space. 14. I OPPOSE the proposal put forth by Councilmembers Yaroslavsky and Ramen to reinstate the disallowance of a basement exemption, contrary to CPC recommendations. I hope that the above makes clear that the current version of the Wildlife Ordinance is deeply flawed. Please revise it!! Thank you! John Bjerke

RE: THE PROPOSED DRAFT WILDLIFE ORDINANCE (CF 14-0518)

Dear Honorable Members and Los Angeles City Planning Staff,

I live within the proposed Wildlife Supplemental Use District ("WLD"), a fully developed and well-established neighborhood, whose homes are primarily smaller 1950's ranch homes on large steep lots with small building pads.

While I recognize the need for protection of Wildlife and Biodiversity and would welcome a well-designed Wildlife Ordinance founded on scientific research, **I do not support *this Wildlife Ordinance*** as it is neither of those.

I urge the PLUM Committee, the City Council, and the Planning Department to respect the will of the affected residents of the proposed WLD, who overwhelmingly oppose the Wildlife Ordinance in its current incarnation, as evidenced by their comments submitted to the Planning Department and the City Planning Commission.

I would **strongly prefer** that the PLUM Committee reject the current incarnation of the Wildlife Ordinance in its entirety, and direct City Planning to draft a Wildlife Ordinance that relies upon scientific research to better protect Wildlife and Biodiversity **without unduly burdening the ordinary homeowner**.

However, if that will not be done, I wish to express my **vehement opposition** to the following regulations contained in the current proposed Wildlife Ordinance, and in Councilmembers Yaroslavsky's and Ramen's letter to the PLUM Committee.

1. **I OPPOSE** the failure of the Wildlife Ordinance to promulgate different regulations for undeveloped/pristine lots and those lots which have already been developed.

This failure results in insufficient protections for undeveloped/ pristine land of high habitat and/or biodiversity value, combined with **overly burdensome regulation of homes on already developed parcels** that have limited habitat or biodiversity value.

2. **I OPPOSE** the proposal put forth by Councilmembers Yaroslavsky and Ramen to reinstate the disallowance of RFA for slopes greater than 60% (aka 31 degrees) contained in Version 2 of the Wildlife Ordinance.

This proposal for a blanket reduction in allowed home size on steeper lots is a classic example of regulatory overkill.

Simply put, there is no nexus between home size, slope steepness, and wildlife habitat destruction where the home is on an already developed parcel

with an existing pad, as is the case of the majority of homes in the WLD. Absent additional grading, which is already regulated under other sections of the Wildlife Ordinance, this reduction in allowable home size severely negatively impacts homeowners while providing minimal benefit to wildlife or biodiversity.

Most homes in my neighborhood have slopes greater than 60% (31 degrees), and most of these homes are relatively small in size. Reducing allowable home size for the majority of our residents will prevent needed increases in home size to accommodate growing families, aging parents, and home offices for remote work. The larger homes that exist in our community will be rendered non-conforming, with the attendant mortgage and insurance difficulties.

Moreover, this heavy-handed reduction in allowable home size would only worsen the City's housing shortage. The California Department of Housing & Community Development (HCD) has already warned the City that reducing RFA below its current level would likely violate California Government Code Section 66300, subdivision (b)(1)(A).

3. **I OPPOSE** the regulation in **Section E(1)(b)** which defines additions of greater than 500sf as a Project under the Wildlife Ordinance.

This 500sf threshold is entirely too low and is applied regardless of the size of the existing home. As a result, it unreasonably burdens the owners of smaller, older homes, such as those that constitute the majority of homes in our neighborhood. Additionally, it encourages homeowners who need more space to sell their homes rather than enlarge them, which is not only detrimental to neighborhood cohesiveness but also has the presumably unintended consequence of increasing the risk that the homes will be bought by developers who will build the largest home they can. At a minimum, additions that would result in homes of less than 3,500sf or 75% of allowed RFA should be exempted from this regulation.

4. **I OPPOSE** the regulation in **Section E(1)(c)** which defines Major Remodels as a Project under the Wildlife Ordinance.

Homeowners with smaller, older homes, similar to most in our neighborhood, will face an unjustifiable burden due to the applicability of the Major Remodel threshold. Bringing these homes up to current standards and building codes significantly increases the likelihood of exceeding the Major Remodel threshold. Consequently, it is crucial to exempt owner-occupied homes of a certain age from this category of Project.

5. **I OPPOSE** the requirement in **Section E(1)(e)** and **Section F.1(f)**, as to non-native trees only, that 2 new trees be planted for the removal of each non-native Significant (aka large) tree.

This regulation poses a significant fire hazard. Section 4906.4.2 of the 2023 California Fire Code (presumably to be adopted by the City in the near future) requires that the dripline at maturity of any newly planted trees be at least 10 feet away from structures and the dripline of other trees. By requiring a two-for-one tree replacement for the removal of large non-indigenous trees, this regulation would require homeowners with small building pads to plant trees that will violate best fire safety practices and fire regulations, or on steeper parts of the property where they cannot be readily maintained in a fire-safe manner.

Further, the native flora in the WLD is primarily chaparral - large native trees are generally only found in riparian areas. While there are many parts of Los Angeles that are in need of additional trees, the WLD is not one of them. A far better approach would be to require homeowners who remove large non-native trees to contribute to a fund dedicated to providing trees to areas where such trees are actually needed, and where they would not be public safety hazard, or jeopardize a homeowners ability to obtain fire insurance.

Additionally, both the increased fire danger (and the increased bird strikes, as noted in the City's own PAWS report) resulting from this regulation would disallow a CEQA exemption for this Ordinance.

6. **I OPPOSE** the requirement in **Section F.1(f)**, as to non-native trees only, that prohibits grading or construction within the dripline of a Significant (aka large) tree.

Where the dripline of a large non-native tree extends over a home, this regulation would unreasonably interfere with homeowners' ability to remodel their homes. Furthermore, as previously stated, the WLD does not require protection for non-native trees, making this requirement both unnecessary and burdensome.

7. **I OPPOSE** the requirement in **Section F.1(j)** that requires trash cans to be stored in a building or special enclosure.

According to the Los Angeles Municipal Code (LAMC) and the Planning Department, these trash can enclosures would be considered structures and thus prohibited in side and front setback areas. Consequently, they would need to be situated in the central portion of homeowners' backyards. Most homes in our neighborhood are on small pads with small or non-existent back

yards, and some back yards are only reachable by stairs. Having odorous and unsightly trash cans enclosures in the middle of our small back yards is untenable, as is dragging them up and down stairs - especially for the elderly or disabled. Storing odorous, insect-attracting trash cans in the garage is equally unacceptable.

Additionally, given that Wildlife intrusion into trash cans stored behind fences on homeowners' properties is extremely rare, and that Wildlife resistant latches are readily available for under \$20, this regulation is wholly unreasonable.

8. **I OPPOSE** the requirement in **Section F.1(j)** for Site Plan Review for homes resulting in greater than 6,000sf.

The 6,000sf threshold is too low. The Planning Department has stated that the *average* new/rebuilt home in the WLD is over 6,000sf, consequently this regulation would require that the *majority* of new/rebuilt homes undergo Site Plan Review.

9. **I OPPOSE** the failure of **Section H.3** to provide for a simplified review process in cases where a Resource is erroneously mapped and does not actually exist in the mapped location and/or where it is clear that the Project would have a negligible impact on the Resource.

The Planning Department has not verified that the Resources are accurately mapped, and the Wildlife Ordinance unreasonably shifts this burden to the homeowner at the significant expense and difficult of a Site Plan Review and Biological Assessment. See Exhibit 1 for examples.

10. **I OPPOSE** the failure of **Section E.1** to exclude homes destroyed by casualties other than natural disasters (e.g. cooking or electrical fires) from the Wildlife Ordinance regulations.

This failure is entirely unreasonable and will result in homeowners having difficulty obtaining mortgages or refinancing.

11. **I OPPOSE** the failure of **F.1(e)(2)** to utilize R1 and R2 Zoning rather than lot size in determining which parcels are subject to the Wildlife Ordinance's Lot Coverage regulations, and to give an overly generous Lot Coverage allowance to large parcels.

Many RE zoned homes in the WLD are on lots that are smaller than R1/R2 lots. Our neighborhood, although zoned primarily RE-15, has several such

lots (e.g. lots of 6,000sf - 7000sf) and these homeowners would be greatly burdened by the application of a 50% Lot Coverage limit to their properties. This burden on homeowners of smaller parcels is especially galling in the face of the absolute gift to developers of mega-mansions of up to 100,000sf of Lot Coverage for larger parcels. **It is these mega-mansion Projects that have a negative impact on Wildlife and Biodiversity, not the small parcel home.**

12. I OPPOSE the regulation in **Section F.1(c)(2)(i)(a)** to the extent that it would prohibit stairs and decks on slopes greater than 100% (aka 45 degrees).

Prohibiting stairs on these slopes creates a public safety hazard. Prohibiting stairs would render it difficult/dangerous for property owners to reach areas of their property for brush clearance and other property maintenance. Further, this regulation restricts homeowners' access to their own property, and as such constitutes a taking.

Many homes on steeper slopes have very small flat pads and are in neighborhoods with no sidewalks and limited access to recreational areas. Decks provide the opportunity for outdoor living space while leaving the land below the deck available for use by wildlife.

13. I OPPOSE Councilmembers Yaroslavsky's and Ramen's proposal to revert to Version 2's inclusion of non-Open Space designated City-owned vacant land in the definition of Open Space.

Per the Planning Department, this change would place Resource Buffers on approximately 1000 adjacent parcels, requiring the owners of those adjacent parcels to undergo expensive and time-consuming Site Plan Review for Projects. The mere fact that the City owns the unimproved parcel does not justify this result, especially where the City itself has declined to designate the parcel as Open Space.

14. I OPPOSE the proposal put forth by Councilmembers Yaroslavsky and Ramen to reinstate the disallowance of a basement exemption, contrary to CPC recommendations. I propose basement exemptions that equal the footprint of the ground/main level of the home. This will not affect wildlife or biodiversity and should remain an option to property owners, especially since they are not allowed to utilize SB9 or 10, due to other area conditions.

I sincerely hope that the above explanation of the impacts of just some of the proposed regulations makes clear that the current version of the Wildlife Ordinance is deeply flawed.

Thank you for your consideration!!

John Bjerke

Communication from Public

Name: Renée Becnel

Date Submitted: 06/19/2023 07:43 AM

Council File No: 14-0518

Comments for Public Posting: Please see the attached letter requesting that PLUM remove this item from the agenda and send it back to planning for full study, review and analysis. Consideration of this Ordinance is premature, particularly with respect to the proposed further revisions made in the last 3 days by Councilwomen Yaroslavsky and Raman.

Re: Wildlife Ordinance Draft (CF 14-0518) PLUM Committee Meeting June 20, 2023

Ladies and Gentlemen,

I am a resident of the Bel Air community which will be directly affected extremely adversely by the current draft of the Wildlife Ordinance and would be even more adversely affected by the revisions proposed by Councilwomen Yaroslavsky and Raman.

I respectfully urge and request the PLUM Commission to remove this item from the June 20 agenda and send it back to the planning department to be fully vetted, particularly with regard to the Councilwomen's proposed further restrictions.

Fundamentally, this Ordinance amounts to a "taking" by the City of significant portions of our property without any showing of a compelling public interest, compensation to its enters for loss of their property or any level of due process. The further adjustments proposed by the Councilwomen exacerbate this since they made their proposal without notifying or polling constituents, public notice , etc. - all at the last minute and basically in the dark of night. These revisions deserve far more public opportunity for discussion and review than one single PLUM meeting that requires citizens to show up in person - on 3 days notice - 2 of those being weekend days. It's shocking they dare to do this when this ordinance has been under consideration for years.

While residents fully support protecting wildlife and minimizing human/wildlife close encounters, as well as addressing adverse climate change, there has not been a single study or report conducted and presented to the public showing that the draconian measures of this ordinance would result in any effective change. In fact, many aspects of the ordinance may actually result in increased wildfire risk and unintended environmental impacts.

Property owners are not opposed to good policy for promoting wildlife and open space protection. However, these new

regulations do not work to preserve large open spaces. They don't create corridors between these open spaces that are as free from potential human contact as possible. In fact they do very few things that are actually good for wildlife. This ordinance will gravely affect small property owners, not the mega mansion developers they are claiming to be going after. Mega developers have the time and resources to get around, and quite frankly violate, the regulations. The City and its citizens would be better served by improved and consistent enforcement of the current regulations in place which, if actually enforced against mega mansion developers, would prove to be quite effective. We would rather see the City devote resources to those efforts than creating yet another regime which conflicts with current rules and will be extremely costly and confusing to even attempt to enforce, all to little avail in accomplishing its stated purposes. Moreover, the Ordinance and proposed changes lack significant and important information and objective guidelines for the approval process for any project that it will result in inevitable inconsistent and like arbitrary and capricious application and inconsistent results.

This set of regulations sets the City in a direct path towards confrontation within the state. This is down-zone plain and simple and thus will run afoul with State law—including CEQA, HAA and other rules regarding zoning. It will end up tying the city up in lawsuit knots- for no reason. It will make our housing shortage worse. It will cause more population outflows. And without truly helping wildlife in the region.

Due process—this ordinance has been pushed by bureaucratic insiders. It has yet to be fully vetted or even discussed in an open and honest way. Most people in the hills still don't realize what is happening. There have been no major studies on the environmental, economic and housing impacts of this ordinance. There has been no effort made to track down who will be negatively impacted—and how badly. Instead this ordinance continues to be shuttled around the back hallways of City Hall without being truly and openly debated. As an example, the Ordinance continues to use problematic definitions of Water Resources and Open Spaces. It identifies alleged water resources that simply do not exist and have not existed in at least 50 years (even during this year's record rainfall). It defines Open Spaces as basically all areas where there is not a structure currently. This reflects the knee jerk one size fits all approach of the

Ordinance and contributes to this amounting to a taking of property.

We ask the PLUM Committee send this ordinance back to the planning department to be fully vetted, to have the parts of the rules removed that don't directly help wildlife and to expand those elements that truly help our wildlife—by formally designating our open areas, to plot out how to connect these habitats and corridors in a way that keeps wildlife out of harm's way (i.e. away from people), and efforts that true wildlife experts have suggested will help LA maintain its unique and wonderful access to nature.

Renée E. Becnel

Communication from Public

Name:

Date Submitted: 06/20/2023 10:19 AM

Council File No: 14-0518

Comments for Public Posting: June 19th, 2023 Via Email and Messenger Los Angeles City Council, PLUM Committee, and Los Angeles City Planning RE: THE PROPOSED DRAFT WILDLIFE ORDINANCE (CF 14-0518) Dear Honorable Members and Los Angeles City Planning Staff, I live within the proposed Wildlife Supplemental Use District (“WLD”), a fully developed and well-established neighborhood, whose homes are primarily smaller 1950’s ranch homes on large steep lots with small building pads. While I recognize the need for protection of Wildlife and Biodiversity and would welcome a well-designed Wildlife Ordinance founded on scientific research, I do not support this Wildlife Ordinance as it is neither of those. I urge the PLUM Committee, the City Council, and the Planning Department to respect the will of the affected residents of the proposed WLD, who overwhelmingly oppose the Wildlife Ordinance in its current incarnation, as evidenced by their comments submitted to the Planning Department and the City Planning Commission. I would strongly prefer that the PLUM Committee reject the current incarnation of the Wildlife Ordinance in its entirety, and direct City Planning to draft a Wildlife Ordinance that relies upon scientific research to better protect Wildlife and Biodiversity without unduly burdening the ordinary homeowner. However, if that will not be done, I wish to express my vehement opposition to the following regulations contained in the current proposed Wildlife Ordinance, and in Councilmembers Yaroslavsky’s and Ramen’s letter to the PLUM Committee. 1. I OPPOSE the failure of the Wildlife Ordinance to promulgate different regulations for undeveloped/pristine lots and those lots which have already been developed. This failure results in insufficient protections for undeveloped/ pristine land of high habitat and/or biodiversity value, combined with overly burdensome regulation of homes on already developed parcels that have limited habitat or biodiversity value. 2. I OPPOSE the proposal put forth by Councilmembers Yaroslavsky and Ramento reinstate the disallowance of RFA for slopes greater than 60% (aka 31 degrees) contained in Version 2 of the Wildlife Ordinance. This proposal for a blanket reduction in allowed home size on steeper lots is a classic example of regulatory overkill. Simply put, there is no nexus between home size, slope steepness, and wildlife habitat destruction where the home is on an already

developed parcel with an existing pad, as is the case of the majority of homes in the WLD. Absent additional grading, which is already regulated under other sections of the Wildlife Ordinance, this reduction in allowable home size severely negatively impacts homeowners while providing minimal benefit to wildlife or biodiversity. Most homes in my neighborhood have slopes greater than 60% (31 degrees), and most of these homes are relatively small in size. Reducing allowable home size for the majority of our residents will prevent needed increases in home size to accommodate growing families, aging parents, and home offices for remote work. The larger homes that exist in our community will be rendered non-conforming, with the attendant mortgage and insurance difficulties. Moreover, this heavy-handed reduction in allowable home size would only worsen the City's housing shortage. The California Department of Housing & Community Development (HCD) has already warned the City that reducing RFA below its current level would likely violate California Government Code Section 66300, subdivision (b)(1)(A).

3. I OPPOSE the regulation in Section E(1)(b) which defines additions of greater than 500sf as a Project under the Wildlife Ordinance. This 500sf threshold is entirely too low and is applied regardless of the size of the existing home. As a result, it unreasonably burdens the owners of smaller, older homes, such as those that constitute the majority of homes in our neighborhood. Additionally, it encourages homeowners who need more space to sell their homes rather than enlarge them, which is not only detrimental to neighborhood cohesiveness but also has the presumably unintended consequence of increasing the risk that the homes will be bought by developers who will build the largest home they can. At a minimum, additions that would result in homes of less than 3,500sf or 75% of allowed RFA should be exempted from this regulation.

4. I OPPOSE the regulation in Section E(1)(c) which defines Major Remodels as a Project under the Wildlife Ordinance. Homeowners with smaller, older homes, similar to most in our neighborhood, will face an unjustifiable burden due to the applicability of the Major Remodel threshold. Bringing these homes up to current standards and building codes significantly increases the likelihood of exceeding the Major Remodel threshold. Consequently, it is crucial to exempt owner-occupied homes of a certain age from this category of Project.

5. I OPPOSE the requirement in Section E(1)(e) and Sect

June 19th, 2023
Via Email and Messenger

Los Angeles City Council, PLUM Committee, and Los Angeles City Planning RE: THE PROPOSED DRAFT
WILDLIFE ORDINANCE (CF 14-0518)

Dear Honorable Members and Los Angeles City Planning Staff,
I live within the proposed Wildlife Supplemental Use District (“WLD”), a fully developed and well-established neighborhood, whose homes are primarily smaller 1950’s ranch homes on large steep lots with small building pads.

While I recognize the need for protection of Wildlife and Biodiversity and would welcome a well-designed Wildlife Ordinance founded on scientific research, I do not support this Wildlife Ordinance as it is neither of those.

I urge the PLUM Committee, the City Council, and the Planning Department to respect the will of the affected residents of the proposed WLD, who overwhelmingly oppose the Wildlife Ordinance in its current incarnation, as evidenced by their comments submitted to the Planning Department and the City Planning Commission. I would strongly prefer that the PLUM Committee reject the current incarnation of the Wildlife Ordinance in its entirety, and direct City Planning to draft a Wildlife Ordinance that relies upon scientific research to better protect Wildlife and Biodiversity without unduly burdening the ordinary homeowner. However, if that will not be done,

I wish to express my vehement opposition to the following regulations contained in the current proposed Wildlife Ordinance, and in Councilmembers Yaroslavsky’s and Ramen’s letter to the PLUM Committee.

1. I OPPOSE the failure of the Wildlife Ordinance to promulgate different regulations for undeveloped/pristine lots and those lots which have already been developed.

This failure results in insufficient protections for undeveloped/ pristine land of high habitat and/or biodiversity value, combined with overly burdensome regulation of homes on already developed parcels that have limited habitat or biodiversity value.

2. I OPPOSE the proposal put forth by Councilmembers Yaroslavsky and Ramento reinstate the disallowance of RFA for slopes greater than 60% (aka 31 degrees) contained in Version 2 of the Wildlife Ordinance.

This proposal for a blanket reduction in allowed home size on steeper lots is a classic example of regulatory overkill. Simply put, there is no nexus between home size, slope steepness, and wildlife habitat destruction where the home is on an already developed parcel with an existing pad, as is the case of the majority of homes in the WLD. Absent additional grading, which is already regulated under other sections of the Wildlife Ordinance, this reduction in allowable home size severely negatively impacts homeowners while providing minimal benefit to wildlife or biodiversity.

Most homes in my neighborhood have slopes greater than 60% (31 degrees), and most of these homes are relatively small in size. Reducing allowable home size for the majority of our residents will prevent needed increases in home size to accommodate growing families, aging parents, and home offices for remote work. The larger homes that exist in our community will be rendered non-conforming, with the attendant mortgage and insurance difficulties.

Moreover, this heavy-handed reduction in allowable home size would only worsen the City’s housing shortage. The California Department of Housing & Community Development (HCD) has already warned the City that reducing RFA below its current level would likely violate California Government Code Section 66300, subdivision (b)(1)(A).

3. I OPPOSE the regulation in Section E(1)(b) which defines additions of greater than 500sf as a Project under the Wildlife Ordinance. This 500sf threshold is entirely too low and is applied regardless of the size of the existing home. As a result, it unreasonably burdens the owners of smaller, older homes, such as those that constitute the majority of homes in our neighborhood. Additionally, it encourages homeowners who need more space to sell their homes rather than enlarge them, which is not only detrimental to neighborhood cohesiveness but also has the presumably unintended consequence of increasing the risk that the homes will be bought by developers who will build the largest home they can. At a minimum, additions that would result in homes of less than 3,500sf or 75% of allowed RFA should be exempted from this regulation.

4. I OPPOSE the regulation in Section E(1)(c) which defines Major Remodels as a Project under the Wildlife Ordinance.

Homeowners with smaller, older homes, similar to most in our neighborhood, will face an unjustifiable burden due to the applicability of the Major Remodel threshold. Bringing these homes up to current standards and building codes significantly increases the likelihood of exceeding the Major Remodel

threshold. Consequently, it is crucial to exempt owner-occupied homes of a certain age from this category of Project.

5. I OPPOSE the requirement in Section E(1)(e) and Section F.1(f), as to non-native trees only, that 2 new trees be planted for the removal of each non-native Significant (aka large) tree.

This regulation poses a significant fire hazard. Section 4906.4.2 of the 2023 California Fire Code (presumably to be adopted by the City in the near future) requires that the dripline at maturity of any newly planted trees be at least 10 feet away from structures and the dripline of other trees. By requiring a two-for-one tree replacement for the removal of large non-indigenous trees, this regulation would require homeowners with small building pads to plant trees that will violate best fire safety practices and fire regulations, or on steeper parts of the property where they cannot be readily maintained in a fire-safe manner.

Further, the native flora in the WLD is primarily chaparral - large native trees are generally only found in riparian areas. While there are many parts of Los Angeles that are in need of additional trees, the WLD is not one of them. A far better approach would be to require homeowners who remove large non-native trees to contribute to a fund dedicated to providing trees to areas where such trees are actually needed, and where they would not be public safety hazard, or jeopardize a homeowners ability to obtain fire insurance.

Additionally, both the increased fire danger (and the increased bird strikes, as noted in the City's own PAWS report) resulting from this regulation would disallow a CEQA exemption for this Ordinance.

6. I OPPOSE the requirement in Section F.1(f), as to non-native trees only, that prohibits grading or construction within the dripline of a Significant (aka large) tree.

Where the dripline of a large non-native tree extends over a home, this regulation would unreasonably interfere with homeowners' ability to remodel their homes. Furthermore, as previously stated, the WLD does not require protection for non-native trees, making this requirement both unnecessary and burdensome..

7. I OPPOSE the requirement in Section F.1(j) that requires trash cans to be stored in a building or special enclosure.

According to the Los Angeles Municipal Code (LAMC) and the Planning Department, these trash can enclosures would be considered structures and thus prohibited in side and front setback areas. Consequently, they would need to be situated in the central portion of homeowners' backyards. Most

homes in our neighborhood are on small pads with small or non-existent back yards, and some back yards are only reachable by stairs. Having odorous and unsightly trash cans enclosures in the middle of our small back yards is untenable, as is dragging them up and down stairs - especially for the elderly or disabled. Storing odorous, insect-attracting trash cans in the garage is equally unacceptable.

Additionally, given that Wildlife intrusion into trash cans stored behind fences on homeowners' properties is extremely rare, and that Wildlife resistant latches are readily available for under \$20, this regulation is wholly unreasonable.

8. I OPPOSE the requirement in Section F.1(j) for Site Plan Review for homes resulting in greater than 6,000sf.

The 6,000 sf threshold is too low. The Planning Department has stated that the average new/rebuilt home in the WLD is over 6,000sf, consequently this regulation would require that the majority of new/rebuilt homes undergo Site Plan Review. **The threshold I think is better to be 10,000 sq ft. to be considered mega mansion.**

9. I OPPOSE the failure of Section H.3 to provide for a simplified review process in cases where a Resource is erroneously mapped and does not actually exist in the mapped location and/or where it is clear that the Project would have a negligible impact on the Resource.

The Planning Department has not verified that the Resources are accurately mapped, and the Wildlife Ordinance unreasonably shifts this burden to the homeowner at the significant expense and difficult of a Site Plan Review and Biological Assessment. See Exhibit 1 for examples.

10. I OPPOSE the failure of Section E.1 to exclude homes destroyed by casualties other than natural disasters (e.g. cooking or electrical fires) from the Wildlife Ordinance regulations.

This failure is entirely unreasonable and will result in homeowners having difficulty obtaining mortgages or refinancing.

11. I OPPOSE the failure of F.1(e)(2) to utilize R1 and R2 Zoning rather than lot size in determining which parcels are subject to the Wildlife Ordinance's Lot Coverage regulations, and to give an overly generous Lot Coverage allowance to large parcels.

Many RE zoned homes in the WLD are on lots that are smaller than R1/R2 lots. Our neighborhood, although zoned primarily RE-15, has several such lots (e.g. lots of 6,000sf - 7000sf) and these homeowners would be greatly burdened by the application of a 50% Lot Coverage limit to their properties.

This burden on homeowners of smaller parcels is especially galling in the face of the absolute gift to developers of mega-mansions of up to 100,000sf of Lot Coverage for larger parcels. It is these mega-mansion Projects that have a negative impact on Wildlife and Biodiversity, not the small parcel home.

12. I OPPOSE the regulation in Section F.1(c)(2)(i)(a) to the extent that it would prohibit stairs and decks on slopes greater than 100% (aka 45 degrees).

Prohibiting stairs on these slopes creates a public safety hazard. Prohibiting stairs would render it difficult/dangerous for property owners to reach areas of their property for brush clearance and other property maintenance. Further, this regulation restricts homeowners' access to their own property, and as such constitutes a taking.

Many homes on steeper slopes have very small flat pads and are in neighborhoods with no sidewalks and limited access to recreational areas. Decks provide the opportunity for outdoor living space while leaving the land below the deck available for use by wildlife.

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Per the Planning Department, this change would place Resource Buffers on approximately 1000 adjacent parcels, requiring the owners of those adjacent parcels to undergo expensive and time-consuming Site Plan Review for Projects. The mere fact that the City owns the unimproved parcel does not justify this result, especially where the City itself has declined to designate the parcel as Open Space.

14. I OPPOSE the proposal put forth by Councilmembers Yaroslavsky and Ramen to reinstate the disallowance of a basement exemption, contrary to CPC recommendations. I propose basement exemptions that equal the footprint of the ground/main level of the home. This will not affect wildlife or biodiversity and should remain an option to property owners, especially since they are not allowed to utilize SB9 or 10, due to other area conditions.

I sincerely hope that the above explanation of the impacts of just some of the proposed regulations makes clear that the current version of the Wildlife Ordinance is deeply flawed.

Sincerely,
Lauri Morrison
Homeowner

Exhibit 1

Example of Erroneous Wildlife Resource in Bel Air Hills, depicting stream traversing homes, pools, and Roscomare Road.

The Wildlife Resource so depicted does not exist.

Source: Current Planning Department Wildlife Resource Map, captured on November 14th, 2022

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Communication from Public

Name: Don & Jenn Hardison
Date Submitted: 06/20/2023 11:23 AM
Council File No: 14-0518
Comments for Public Posting: Please see the attached

June 19th, 2023

Via Email

Los Angeles City Council, PLUM Committee, and Los Angeles City Planning
RE: THE PROPOSED DRAFT WILDLIFE ORDINANCE (CF 14-0518)

Dear Honorable Members and Los Angeles City Planning Staff,

I live within the proposed Wildlife Supplemental Use District ("WLD"), a fully developed and well-established neighborhood, whose homes are primarily smaller 1950's ranch homes on large steep lots with small building pads.

While I recognize the need for protection of Wildlife and Biodiversity and would welcome a well-designed Wildlife Ordinance founded on scientific research, I do not support this Wildlife Ordinance as it is neither of those.

I urge the PLUM Committee, the City Council, and the Planning Department to respect the will of the affected residents of the proposed WLD, who overwhelmingly oppose the Wildlife Ordinance in its current incarnation, as evidenced by their comments submitted to the Planning Department and the City Planning Commission.

I would strongly prefer that the PLUM Committee reject the current incarnation of the Wildlife Ordinance in its entirety, and direct City Planning to draft a Wildlife Ordinance that relies upon scientific research to better protect Wildlife and Biodiversity without unduly burdening the ordinary homeowner. However, if that will not be done, I wish to express my vehement opposition to the following regulations contained in the current proposed Wildlife Ordinance, and in Councilmembers Yaroslavsky's and Ramen's letter to the PLUM Committee.

1. I OPPOSE the failure of the Wildlife Ordinance to promulgate different regulations for undeveloped/pristine lots and those lots which have already been developed.

This failure results in insufficient protections for undeveloped/ pristine land of high habitat and/or biodiversity value, combined with overly burdensome regulation of homes on already developed parcels that have limited habitat or biodiversity value.

2. I OPPOSE the proposal put forth by Councilmembers Yaroslavsky and Ramen to reinstate the disallowance of RFA for slopes greater than 60% (aka 31 degrees) contained in Version 2 of the Wildlife Ordinance.

This proposal for a blanket reduction in allowed home size on steeper lots is a

classic example of regulatory overkill.

Simply put, there is no nexus between home size, slope steepness, and wildlife habitat destruction where the home is on an already developed parcel with an existing pad, as is the case of the majority of homes in the WLD. Absent additional grading, which is already regulated under other sections of the Wildlife Ordinance, this reduction in allowable home size severely negatively impacts homeowners while providing minimal benefit to wildlife or biodiversity.

Most homes in my neighborhood have slopes greater than 60% (31 degrees), and most of these homes are relatively small in size. Reducing allowable home size for the majority of our residents will prevent needed increases in home size to accommodate growing families, aging parents, and home offices for remote work. The larger homes that exist in our community will be rendered non-conforming, with the attendant mortgage and insurance difficulties.

Moreover, this heavy-handed reduction in allowable home size would only worsen the City's housing shortage. The California Department of Housing & Community Development (HCD) has already warned the City that reducing RFA below its current level would likely violate California Government Code Section 66300, subdivision (b)(1)(A).

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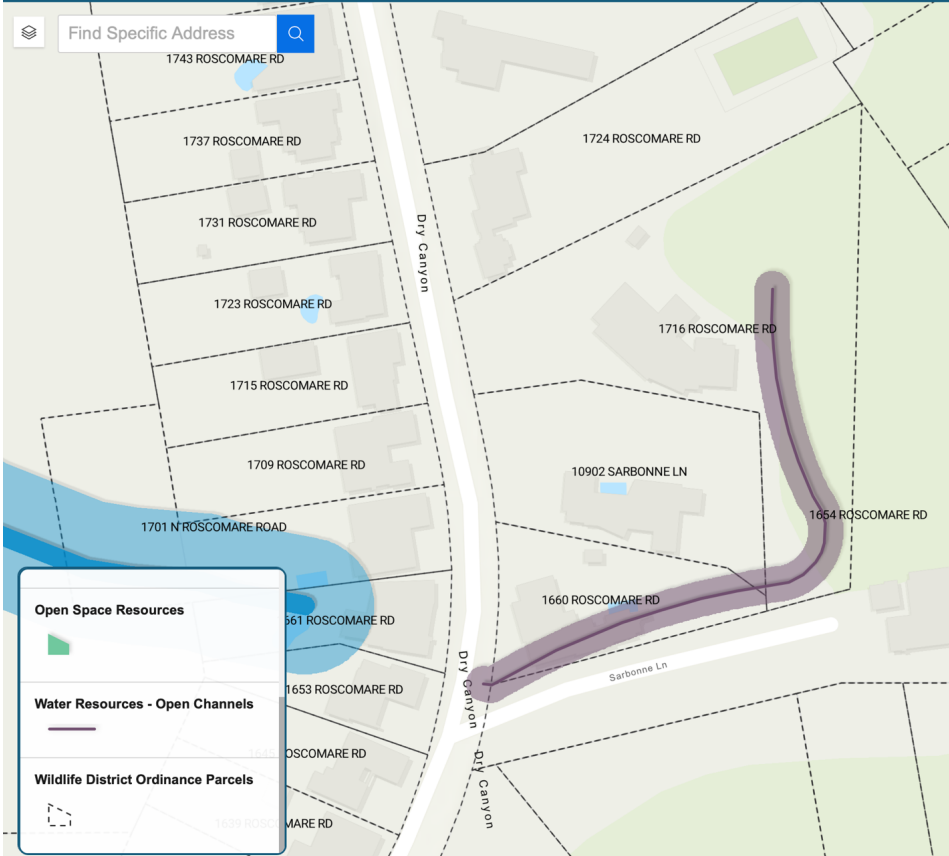
Sincerely,
Donnie & Jennifer Hardison
Homeowners- Linda Flora Drive

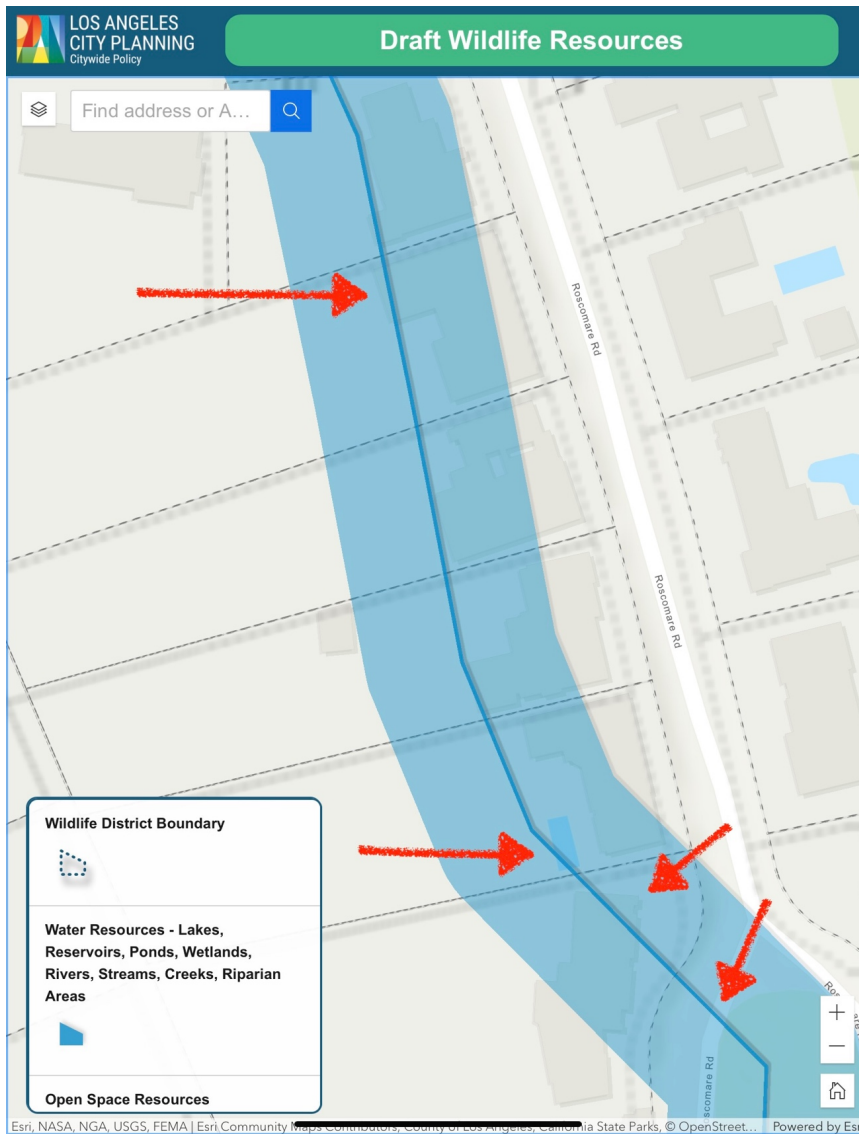
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Source: Current Planning Department Wildlife Resource Map, captured on November
14th, 2022





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 depicting an Open Channel running through the side of a home.
 The Wildlife Resource so depicted does not exist.
 Source: Current Planning Department Wildlife Resource Map, captured on June 19th,
 2023

Communication from Public

Name: Alan Backus

Date Submitted: 06/20/2023 01:44 PM

Council File No: 14-0518

Comments for Public Posting: I am a homeowner affected by the proposed draft wildlife ordinance (CF 14-0518) and I oppose its passage. I support the concept of helping to protect our wildlife, however the draconian measures proposed in this ordinance are grossly unfair to those of us homeowners who have invested heavily in our Los Angeles homes. It would be greatly appreciated if you can use your powers to defeat this ordinance

June 20, 2023

RE: THE PROPOSED DRAFT WILDLIFE ORDINANCE (CF 14-0518)

Dear Honorable Members and Los Angeles City Planning Staff,

I live within the proposed Wildlife Supplemental Use District ("WLD"), a fully developed and well-established neighborhood, whose homes are primarily smaller 1950's ranch homes on large steep lots with small building pads.

While I recognize the need for protection of Wildlife and Biodiversity and would welcome a well-designed Wildlife Ordinance founded on scientific research, **I do not support *this* Wildlife Ordinance** as it is neither of those.

I urge the PLUM Committee, the City Council, and the Planning Department to respect the will of the affected residents of the proposed WLD, who overwhelmingly oppose the Wildlife Ordinance in its current incarnation, as evidenced by their comments submitted to the Planning Department and the City Planning Commission.

I would strongly prefer that the PLUM Committee reject the current incarnation of the Wildlife Ordinance in its entirety, and direct City Planning to draft a Wildlife Ordinance that relies upon scientific research to better protect Wildlife and Biodiversity without unduly burdening the ordinary homeowner. However, if that will not be done, I wish to express my vehement opposition to the following regulations contained in the current proposed Wildlife Ordinance, and in Councilmembers Yaroslavsky's and Ramen's letter to the PLUM Committee.

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Most homes in my neighborhood have slopes greater than 60% (31 degrees), and most of these homes are relatively small in size. Reducing allowable home size for the majority of our residents will prevent needed increases in home size to accommodate growing families, aging parents, and home offices for remote work. The larger homes that exist in our community will be rendered non-conforming, with the attendant mortgage and insurance difficulties.

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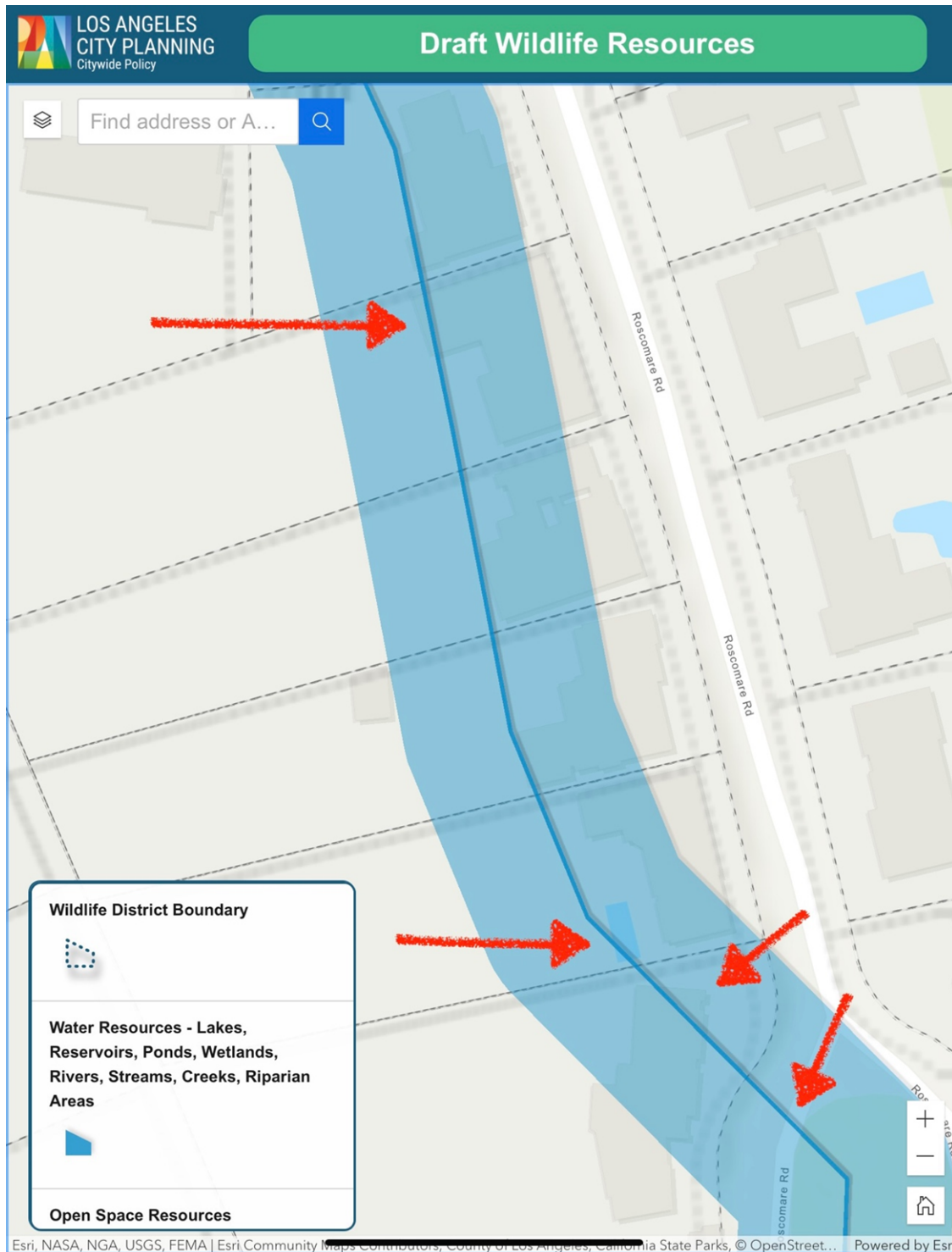
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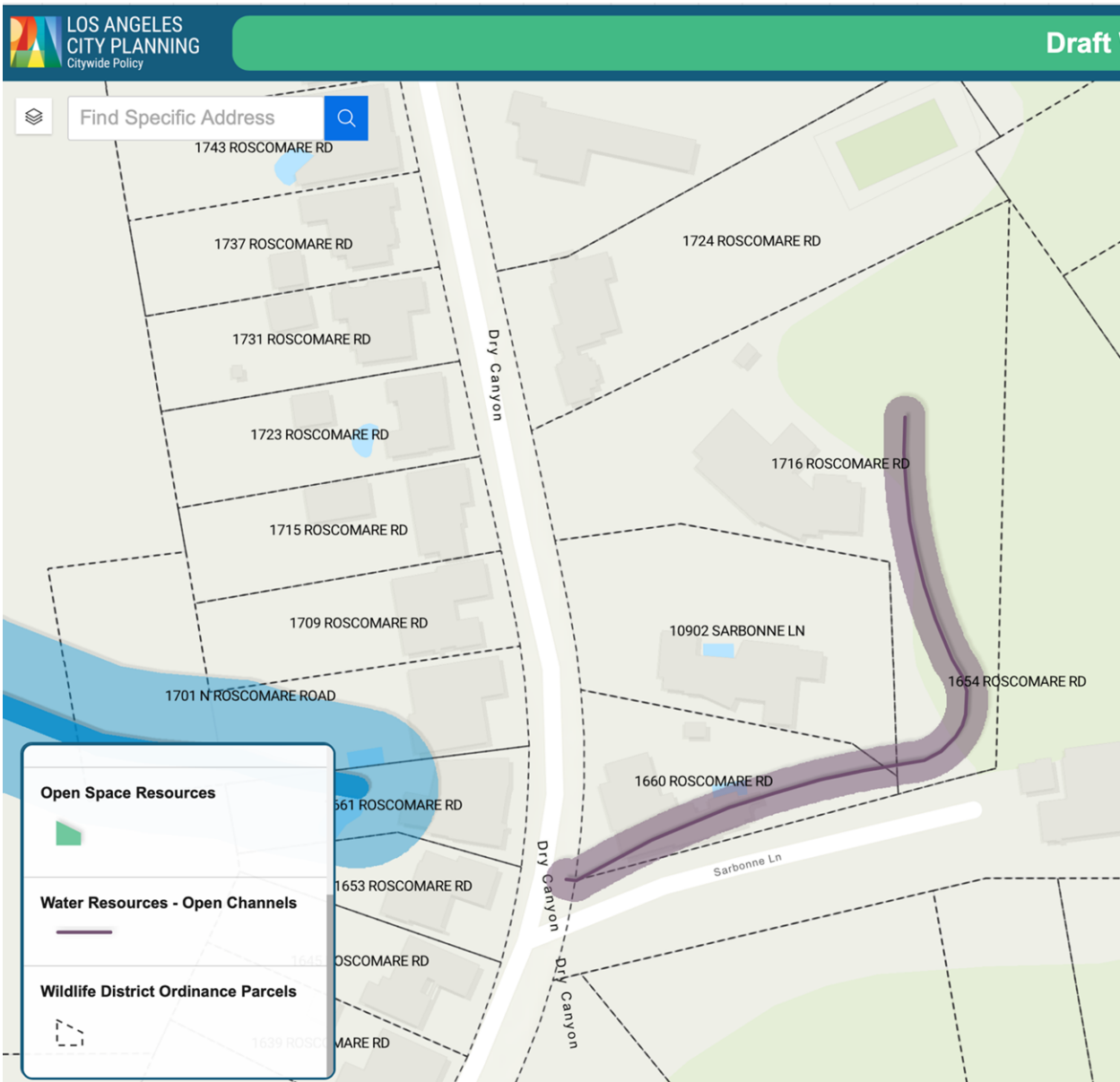
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depicting an Open Channel running through the side of a home.
The Wildlife Resource so depicted does not exist.

Source: Current Planning Department Wildlife Resource Map, captured on June 19th, 2023



Communication from Public

Name: Jill Smalofsky

Date Submitted: 06/20/2023 01:51 PM

Council File No: 14-0518

Comments for Public Posting: Please send this back for revision as it doesn't help wildlife in as many ways as it should. This harms homeowners with small homes and promotes large developments which harms the animals!

June 19 th , 2023
Via Email

Los Angeles City Council, PLUM Committee, and Los Angeles City Planning

RE: THE PROPOSED DRAFT WILDLIFE ORDINANCE (CF 14-0518)

Dear Honorable Members and Los Angeles City Planning Staff,

I live within the proposed Wildlife Supplemental Use District ("WLD"), a fully developed and well-established neighborhood, whose homes are primarily smaller 1950's ranch homes on large steep lots with small building pads.

While I recognize the need for protection of Wildlife and Biodiversity and would welcome a well-designed Wildlife Ordinance founded on scientific research, I do not support this Wildlife Ordinance as it is neither of those.

I urge the PLUM Committee, the City Council, and the Planning Department to respect the will of the affected residents of the proposed WLD, who overwhelmingly oppose the Wildlife Ordinance in its current incarnation, as evidenced by their comments submitted to the Planning Department and the City Planning Commission.

I would strongly prefer that the PLUM Committee reject the current incarnation of the Wildlife Ordinance in its entirety, and direct City Planning to draft a Wildlife Ordinance that relies upon scientific research to better protect Wildlife and Biodiversity without unduly burdening the ordinary homeowner. However, if that will not be done, I wish to express my vehement opposition to the following regulations contained in the current proposed Wildlife Ordinance, and in Councilmembers Yaroslavsky's and Ramen's letter to the PLUM Committee.

I OPPOSE the failure of the Wildlife Ordinance to promulgate different regulations for undeveloped/pristine lots and those lots which have already been developed.

This failure results in insufficient protections for undeveloped/ pristine land of high habitat and/or biodiversity value, combined with overly burdensome regulation of homes on already developed parcels that have limited habitat or biodiversity value.

I OPPOSE the proposal put forth by Councilmembers Yaroslavsky and Ramen to reinstate the disallowance of RFA for slopes greater than 60% (aka 31 degrees) contained in Version 2 of the Wildlife Ordinance.

This proposal for a blanket reduction in allowed home size on steeper lots is a classic example of regulatory overkill.

Simply put, there is no nexus between home size, slope steepness, and wildlife habitat destruction where the home is on an already developed parcel with an existing pad, as is the case of the majority of homes in the WLD. Absent additional grading, which is already regulated under other sections of the Wildlife Ordinance, this reduction in allowable home size severely negatively impacts homeowners while providing minimal benefit to wildlife or biodiversity.

Most homes in my neighborhood have slopes greater than 60% (31 degrees), and

most of these homes are relatively small in size. Reducing allowable home size for the majority of our residents will prevent needed increases in home size to accommodate growing families, aging parents, and home offices for remote work. The larger homes that exist in our community will be rendered non-conforming, with the attendant mortgage and insurance difficulties.

Moreover, this heavy-handed reduction in allowable home size would only worsen the City's housing shortage. The California Department of Housing & Community Development (HCD) has already warned the City that reducing RFA below its current level would likely violate California Government Code Section 66300, subdivision (b)(1)(A).

I OPPOSE the regulation in Section E(1)(b) which defines additions of greater than 500sf as a Project under the Wildlife Ordinance.

This 500sf threshold is entirely too low and is applied regardless of the size of the existing home. As a result, it unreasonably burdens the owners of smaller, older homes, such as those that constitute the majority of homes in our neighborhood. Additionally, it encourages homeowners who need more space to sell their homes rather than enlarge them, which is not only detrimental to neighborhood cohesiveness but also has the presumably unintended consequence of increasing the risk that the homes will be bought by developers who will build the largest home they can. At a minimum, additions that would result in homes of less than 3,500sf or 75% of allowed RFA should be exempted from this regulation.

I OPPOSE the regulation in Section E(1)(c) which defines Major Remodels as a Project under the Wildlife Ordinance.

Homeowners with smaller, older homes, similar to most in our neighborhood, will face an unjustifiable burden due to the applicability of the Major Remodel threshold. Bringing these homes up to current standards and building codes significantly increases the likelihood of exceeding the Major Remodel threshold. Consequently, it is crucial to exempt owner-occupied homes of a certain age from this category of Project.

I OPPOSE the requirement in Section E(1)(e) and Section F.1(f), as to non-native trees only, that 2 new trees be planted for the removal of each non-native Significant (aka large) tree.

This regulation poses a significant fire hazard. Section 4906.4.2 of the 2023 California Fire Code (presumably to be adopted by the City in the near future) requires that the dripline at maturity of any newly planted trees be at least 10 feet away from structures and the dripline of other trees. By requiring a two-for-one tree replacement for the removal of large non-indigenous trees, this regulation would require homeowners with small building pads to plant trees that will violate best fire safety practices and fire regulations, or on steeper parts of the property where they cannot be readily maintained in a fire-safe manner.

Further, the native flora in the WLD is primarily chaparral - large native trees are generally only found in riparian areas. While there are many parts of Los Angeles that are in need of additional trees, the WLD is not one of them. A far better

approach would be to require homeowners who remove large non-native trees to contribute to a fund dedicated to providing trees to areas where such trees are actually needed, and where they would not be public safety hazard, or jeopardize a homeowners ability to obtain fire insurance.

Additionally, both the increased fire danger (and the increased bird strikes, as noted in the City's own PAWS report) resulting from this regulation would disallow a CEQA exemption for this Ordinance.

I OPPOSE the requirement in Section F.1(f), as to non-native trees only, that prohibits grading or construction within the dripline of a Significant (aka large) tree.

Where the dripline of a large non-native tree extends over a home, this regulation would unreasonably interfere with homeowners' ability to remodel their homes.

Furthermore, as previously stated, the WLD does not require protection for non-native trees, making this requirement both unnecessary and burdensome..

I OPPOSE the requirement in Section Section F.1(j) that requires trash cans to be stored in a building or special enclosure.

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especially for the elderly or disabled. Storing odorous, insect-attracting trash cans in the garage is equally unacceptable.

Additionally, given that Wildlife intrusion into trash cans stored behind fences on homeowners' properties is extremely rare, and that Wildlife resistant latches are readily available for under \$20, this regulation is wholly unreasonable.

I OPPOSE the requirement in Section F.1(j) for Site Plan Review for homes resulting in greater than 6,000sf.

The 6,000sf threshold is too low. The Planning Department has stated that the average new/rebuilt home in the WLD is over 6,000sf, consequently this regulation would require that the majority of new/rebuilt homes undergo Site Plan Review.

I OPPOSE the failure of Section H.3 to provide for a simplified review process in cases where a Resource is erroneously mapped and does not actually exist in the mapped location and/or where it is clear that the Project would have a negligible impact on the Resource.

The Planning Department has not verified that the Resources are accurately mapped, and the Wildlife Ordinance unreasonably shifts this burden to the homeowner at the significant expense and difficult of a Site Plan Review and Biological Assessment. See Exhibit 1 for examples.

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This failure is entirely unreasonable and will result in homeowners having difficulty obtaining mortgages or refinancing.

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This burden on homeowners of smaller parcels is especially galling in the face of the absolute gift to developers of mega-mansions of up to 100,000sf of Lot Coverage for larger parcels. It is these mega-mansion Projects that have a negative impact on Wildlife and Biodiversity, not the small parcel home.

I OPPOSE the regulation in Section F.1(c)(2)(i)(a) to the extent that it would prohibit stairs and decks on slopes greater than 100% (aka 45 degrees).

Prohibiting stairs on these slopes creates a public safety hazard. Prohibiting stairs would render it difficult/dangerous for property owners to reach areas of their property for brush clearance and other property maintenance. Further, this regulation restricts homeowners' access to their own property, and as such constitutes a taking.

Many homes on steeper slopes have very small flat pads and are in neighborhoods with no sidewalks and limited access to recreational areas. Decks provide the opportunity for outdoor living space while leaving the land below the deck available for use by wildlife.

I OPPOSE Councilmembers Yaroslavsky's and Ramen's proposal to revert to Version 2's inclusion of non-Open Space designated City-owned vacant land in the definition of Open Space.

Per the Planning Department, this change would place Resource Buffers on approximately 1000 adjacent parcels, requiring the owners of those adjacent parcels to undergo expensive and time-consuming Site Plan Review for Projects. The mere fact that the City owns the unimproved parcel does not justify this result, especially where the City itself has declined to designate the parcel as Open Space.

I OPPOSE the proposal put forth by Councilmembers Yaroslavsky and Ramen to reinstate the disallowance of a basement exemption, contrary to CPC recommendations. I propose basement exemptions that equal the footprint of the ground/main level of the home. This will not affect wildlife or biodiversity and should remain an option to property owners, especially since they are not allowed to utilize SB9 or 10, due to other area conditions.

I sincerely hope that the above explanation of the impacts of just some of the proposed regulations makes clear that the current version of the Wildlife Ordinance is deeply flawed.

Sincerely,
Jill Smalofsky

Homeowner

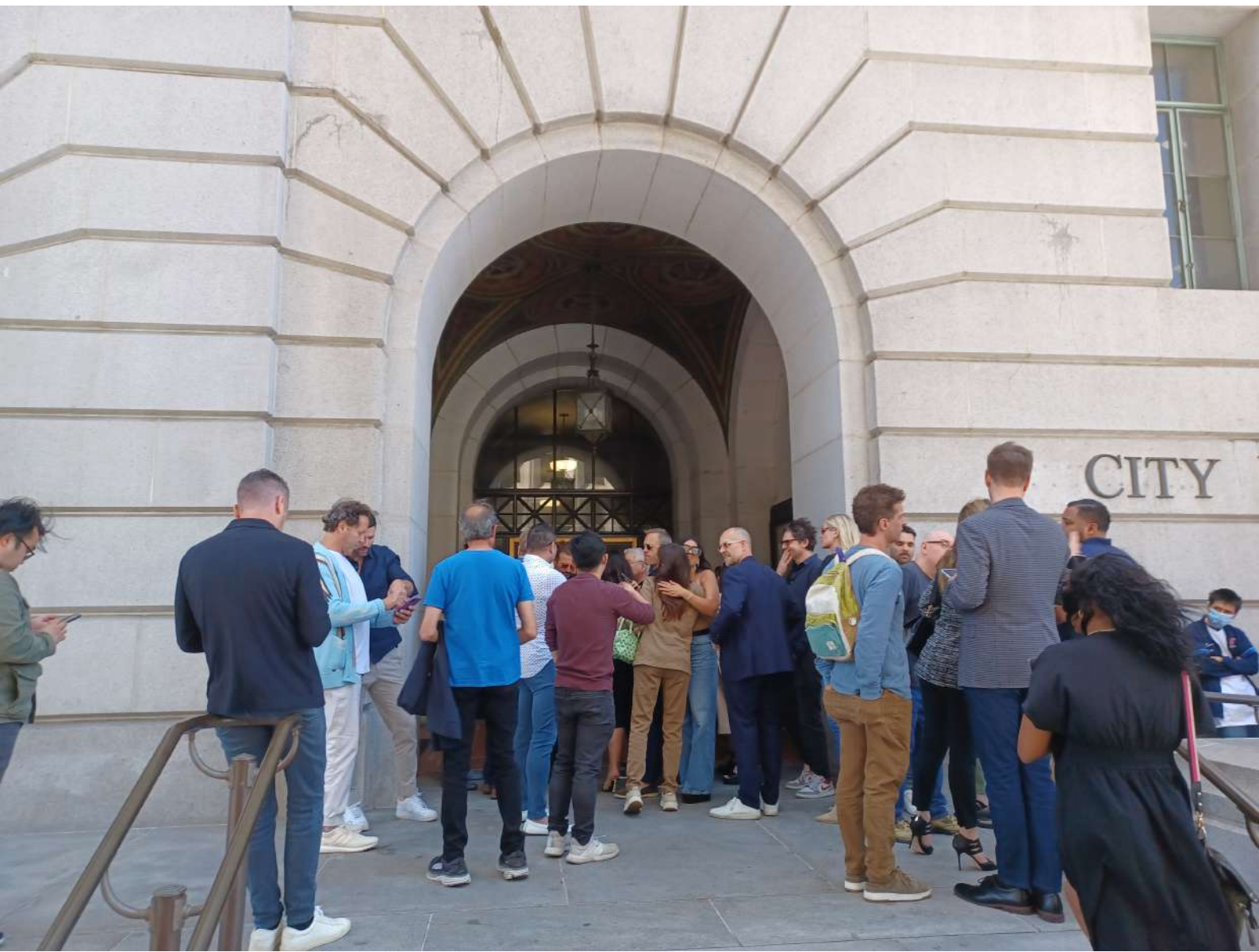
Communication from Public

Name: Paul

Date Submitted: 06/20/2023 02:48 PM

Council File No: 14-0518

Comments for Public Posting: See attached pics of the line outside. Let more people into the meeting!!! This should not be done without the appropriate public comment period!!! Everyone is already talking about class action if this goes through in this manner. Killing the economy should be done in the open if it's done at all. This bill will kill the economy. PLEASE OPEN THE DOORS FOR PUBLIC TO COME IN!!!
Thank you



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Date Submitted: 06/20/2023 02:51 PM

Council File No: 14-0518

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Thank you



Communication from Public

Name: Jeffrey A. Kaplan

Date Submitted: 06/19/2023 09:57 PM

Council File No: 14-0518

Comments for Public Posting: I object to the draft Wildlife Ordinance as deccribed in attached.

JEFFREY A. KAPLAN
ATTORNEY AT LAW (inactive)
jeffreykaplan@msn.com

June 19th, 2023

Via Email

Los Angeles City Council, PLUM Committee, and Los Angeles City Planning

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Dear Honorable Members and Los Angeles City Planning Staff,

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I would strongly prefer that the PLUM Committee reject the current incarnation of the Wildlife Ordinance in its entirety, and direct City Planning to draft a Wildlife Ordinance that relies upon scientific research to better protect Wildlife and Biodiversity without unduly burdening the ordinary homeowner. However, if that will not be done, I wish to express my vehement opposition to the following regulations contained in the current proposed Wildlife Ordinance, and in Councilmembers Yaroslavsky's and Ramen's letter to the PLUM Committee.

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Simply put, there is no nexus between home size, slope steepness, and wildlife habitat destruction where the home is on an already developed parcel with an existing pad, as is the case of the properties and homes I own in the WLD. Absent additional grading, which is already regulated under other sections of the Wildlife Ordinance, this reduction in allowable home size severely negatively impacts homeowners while providing minimal benefit to wildlife or biodiversity.

Most homes including homes I own in my neighborhood have slopes greater than 60% (31 degrees), and most of these homes are relatively small in size. Reducing allowable home size for the majority of our residents will prevent needed increases in home size to accommodate growing families, aging parents, and home offices for remote work. The larger homes that exist in our community will be rendered non-conforming, with the attendant mortgage and insurance difficulties.

Moreover, this heavy-handed reduction in allowable home size would only worsen the City's housing shortage. The California Department of Housing & Community Development (HCD) has already warned the City that reducing RFA below its current level would likely violate California Government Code Section 66300, subdivision (b)(1)(A).

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Many RE zoned homes in the WLD are on lots that are smaller than R1/R2 lots. Our neighborhood, although zoned primarily RE-15, has several such lots (e.g. lots of 6,000sf - 7000sf) and these homeowners would be greatly burdened by the application of a 50% Lot Coverage limit to their properties.

This burden on homeowners of smaller parcels is especially galling in the face of the absolute gift to developers of mega-mansions of up to 100,000sf of Lot Coverage for larger parcels. It is these mega-mansion Projects that have a negative impact on Wildlife and Biodiversity, not the small parcel home.

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Sincerely,

Jeffrey A. Kaplan

Bel Air multiple house Homeowner

Communication from Public

Name: Gary Davidson
Date Submitted: 06/19/2023 09:57 PM
Council File No: 14-0518
Comments for Public Posting: See attached letter.

June 19th, 2023

Via Email and Messenger

Los Angeles City Council, PLUM Committee, and Los Angeles City Planning
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Prohibiting stairs on these slopes creates a public safety hazard. Prohibiting stairs would render it difficult/dangerous for property owners to reach areas of their property for brush clearance and other property maintenance. Further, this regulation restricts homeowners' access to their own property, and as such constitutes a taking.

Many homes on steeper slopes have very small flat pads and are in neighborhoods with no sidewalks and limited access to recreational areas. Decks provide the opportunity for outdoor living space while leaving the land below the deck available for use by wildlife.

13. **I OPPOSE** Councilmembers Yaroslavsky's and Ramen's proposal to revert to Version 2's inclusion of non-Open Space designated City-owned vacant land in the definition of Open Space.

Per the Planning Department, this change would place Resource Buffers on approximately 1000 adjacent parcels, requiring the owners of those adjacent parcels to undergo expensive and time-consuming Site Plan Review for Projects. The mere fact that the City owns the unimproved parcel does not justify this result, especially where the City itself has declined to designate the parcel as Open Space.

14. **I OPPOSE** the proposal put forth by Councilmembers Yaroslavsky and Ramen to reinstate the disallowance of a basement exemption, contrary to CPC recommendations. I propose basement exemptions that equal the footprint of the ground/main level of the home. This will not affect wildlife or biodiversity and should remain an option to property owners, especially since they are not allowed to utilize SB9 or 10, due to other area conditions.

I sincerely hope that the above explanation of the impacts of just some of the proposed regulations makes clear that the current version of the Wildlife Ordinance is deeply flawed.

Sincerely,

Gary Davidson

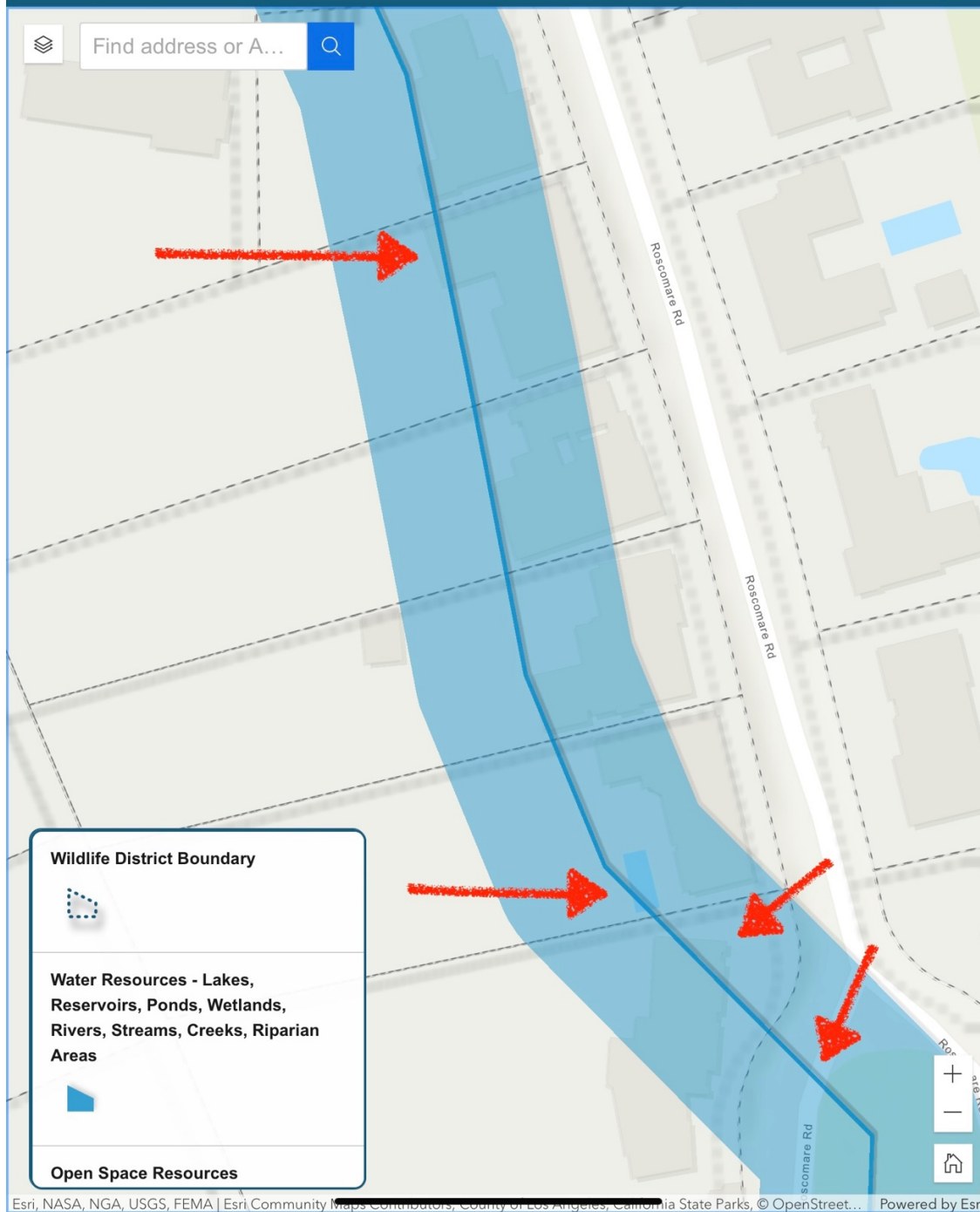
Hillside Property Owner

Exhibit 1

Example of Erroneous Wildlife Resource in Bel Air Hills,
depicting stream traversing homes, pools, and Roscomare Road.

The Wildlife Resource so depicted does not exist.

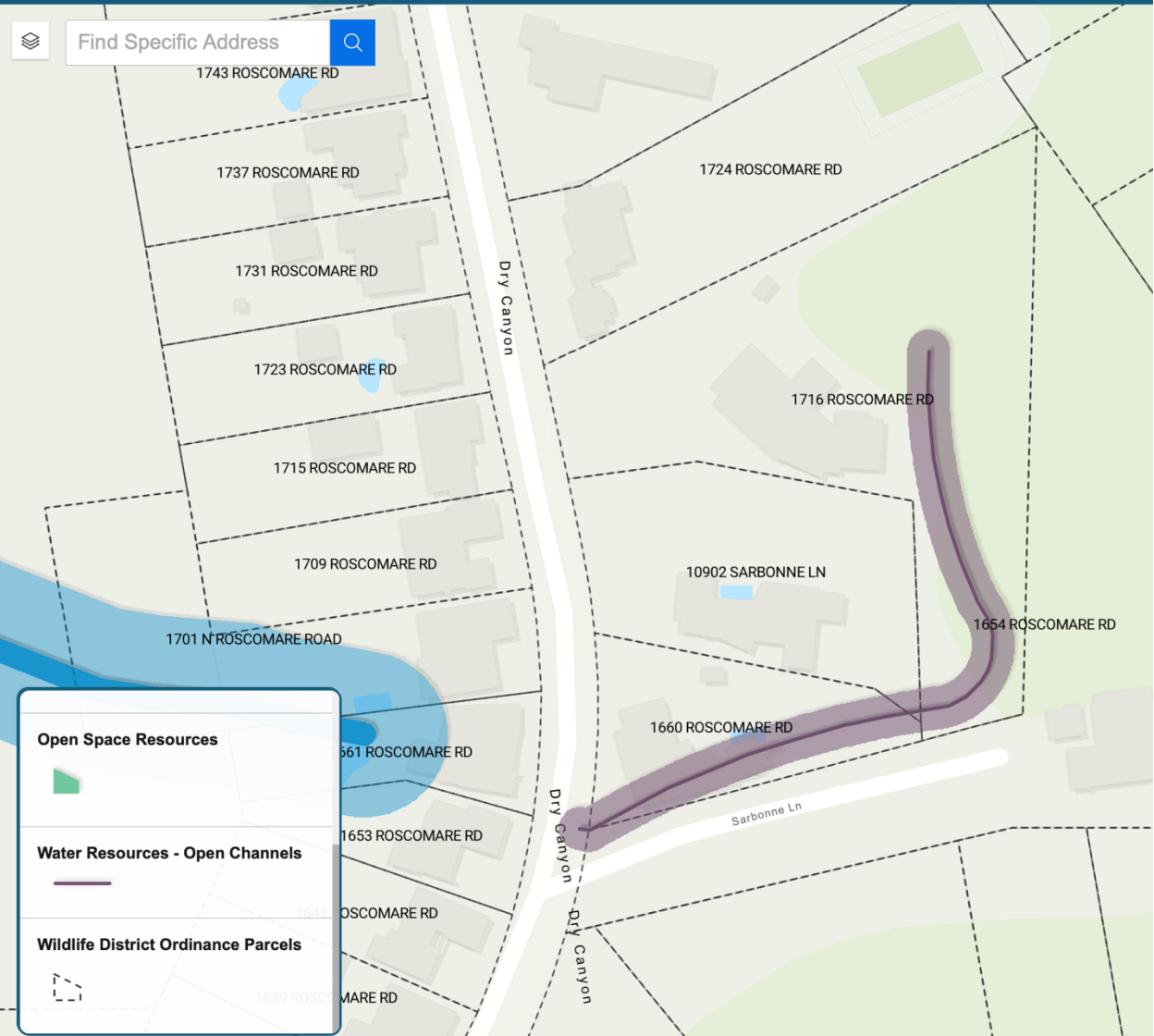
Source: Current Planning Department Wildlife Resource Map, captured on November 14th, 2022



Esri, NASA, NGA, USGS, FEMA | Esri Community Maps Contributors, County of Los Angeles, California State Parks, © OpenStreet... Powered by Esri

Example of Erroneous Wildlife Resource in Bel Air Hills,
depicting an Open Channel running through the side of a home.
The Wildlife Resource so depicted does not exist.

Source: Current Planning Department Wildlife Resource Map, captured on June 19th, 2023



Communication from Public

Name:

Date Submitted: 06/19/2023 09:59 PM

Council File No: 14-0518

Comments for Public Posting: Please see attached letter, from organizations representing hundreds of thousands of Angelenos, in strong support of the wildlife pilot ordinance and expansion, and Councilwomen Raman and Yaroslavsky's recommendations to strengthen the ordinance.



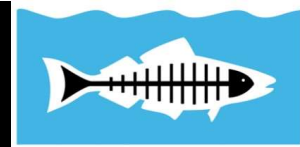
CITIZENS FOR
LOS ANGELES
WILDLIFE



SAVE
POPPY
PEAK



DEFEND
BALLONA
WETLANDS



Heal the Bay

SAVE OUR CANYONS



BALLONA INSTITUTE
restoration, research, education, artistic expression



Endangered Habitats League
Dedicated to Ecosystem Protection
and Sustainable Land Use



Santa Clarita Organization
for Planning and the
Environment (SCOPE)
www.scope.org



IN DEFENSE
OF ANIMALS

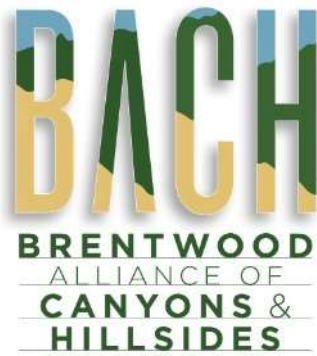


Social Eco Education

SANTA MONICA MOUNTAINS
TASK FORCE



ISABELLE DUVIVIER
ARCHITECTURE + URBAN DESIGN



June 19, 2023

The Honorable Marqueece Harris-Dawson
and Honorable Planning & Land Use Management (PLUM) Committee Members
200 N. Spring Street, Room 450
Los Angeles, CA 90012

RE: **STRONG SUPPORT for Wildlife Pilot ordinance** (Council File #14-0518)

Dear Chair Councilmember Harris-Dawson and PLUM Committee Members:

We, the undersigned, representing hundreds of thousands of members and supporters in Los Angeles, write in **STRONG SUPPORT** of both approving the long-pending wildlife pilot ordinance, including the improvements recommended by Councilwomen Raman and Yaroslavsky (letter in CF#14-0518 dated 6/13/23), and further strengthening the ordinance language.

The vote by your committee couldn't be more timely or more necessary. The decade-long struggles and sad demise of P-22 epitomized the larger issues faced by wildlife in our region: overdevelopment blocking habitat connectivity, fatal auto collisions, and rat poisoning of the entire food chain. While P-22 is gone, the same challenges continue for all the remaining wildlife. The outpouring of grief and support for P-22 underlines how popular local wildlife protection efforts have become during his lifetime.

What is unique and important about this wildlife pilot ordinance is that the process is already in place to expand the ordinance from the pilot area between the 405 and the 101 freeways to the wildlife areas around the city, including especially environmental justice areas where improving access to nature and protecting existing natural areas couldn't be more important for all Angelenos.

That said, in addition to the recommendations from Councilwomen Raman and Yaroslavsky, we believe the proposed ordinance could be further strengthened. As currently proposed, the Open Space Buffers that trigger site plan review are currently 25 feet or less. This would prevent the trigger of Site Plan Review for projects directly across an existing roadway from open space; many major streets like Mulholland Drive are wider than 25 feet. We support one of the following improvements:

- 1) Revert back to an Open Space Buffer of 50 feet, which was proposed in the second draft of the wildlife ordinance. Then-Councilmember Paul Koretz, the author of the original legislation, advocated for a return to a 50 foot buffer in his comments before the City Planning Commission and we concur.
- 2) A compromise for a 35 foot buffer which would protect connectivity for many projects on the opposite side of a street from open space; or
- 3) Maintain the 25 foot buffer, but remove width of streets and roads from 25 foot distance measurement.

Given the scientific study published in the journal, *Ecological Applications*, highlighting the risk of extinction of the Southern California Mountain Lions within the next fifty years, this vote the City Council takes on the wildlife ordinance to protect wildlife habitat connectivity will ultimately determine their fate.

Respectfully yours,

Tony Tucci, Chair & Co-Founder
Citizens for Los Angeles Wildlife (CLAW)

Wendy-Sue Rosen, Co-Founder
Brentwood Alliance of Canyons & Hillsides

Marian Dodge, Chair
The Federation of Hillside and Canyon Associations

Jamie Hall
President, Laurel Canyon Land Trust
President, Laurel Canyon Association

Gerry Han, President
Friends of Griffith Park

Charlotte Lerchenmuller
Sylvia Cruz
Dr. Roxanne Cruz-de Hoyos
Roy Payran
Save Paradise Hill
North East LA SOUL (NELA SOUL)

Shelley Billik, Chair
Isabelle Duvivier, Vice Chair
Community Forest Advisory Committee

Casey Maddren, President
United Neighborhoods for Los Angeles (UN4LA)

Mark Levine, Board President
Save Our Canyons

Kim Lamorie, President
Las Virgenes Homeowners Federation, Inc.
of the Santa Monica Mountains

Francine Hanberg, MD
Past VP, LA County Medical Association
Infectious Disease Specialist
Bel Air resident

Randi Feilich, Wildlife Advocate,
Hollywood Hills Homeowner,
Realtor

Tom Freeman, President
Canyon Back Alliance

Dan Silver, Executive Director
Endangered Habitats League

Bruce Reznik, Executive Director
Los Angeles Waterkeeper

Paulina Torres, Staff Attorney
Natural Resources Defense Council (NRDC)

Eric Edmunds, Chair
Sierra Club Santa Monica Mountains Task Force

James Hines, Team Leader
Sierra Club California Wildlife Team

Joanne D'Antonio, Chair
Trees Committee
Neighborhood Council Sustainability Alliance

Lynne Plambeck, President
Santa Clarita Organization for Planning
and the Environment

Claire Schlotterbeck, Executive Director
Hills for Everyone

Martha Camacho Rodriguez, Director
SEE (Social Eco Education)

Dennis G. Arguelles, Southern California Director
National Parks Conservation Association

Marcia Hanscom, Community Organizer
Defend Ballona Wetlands

Robert Roy van de Hoek, Wildlife Biologist
Ballona Wetlands Institute

Jennifer Conrad, DVM, Director
The Paw Project

Lisa Levinson, Campaigns Director
In Defense of Animals

Jane Velez-Mitchell
Co-Founder, Protect Ballona Wetlands
Founder, UnchainedTV

Tracy Quinn, President & CEO
Heal the Bay

Andy Shrader, Father of two

Communication from Public

Name: Joan Rimmon

Date Submitted: 06/19/2023 10:24 PM

Council File No: 14-0518

Comments for Public Posting: I am totally opposed to the Wildlife Plan for the area I live in,

Los Angeles City Council, PLUM Committee, and Los Angeles City Planning
RE: THE PROPOSED DRAFT WILDLIFE ORDINANCE (CF 14-0518)

Dear Honorable Members and Los Angeles City Planning Staff,

I live within the proposed Wildlife Supplemental Use District ("WLD"), a fully developed and well-established neighborhood, whose homes are primarily smaller 1950's ranch homes on large steep lots with small building pads.

While I recognize the need for protection of Wildlife and Biodiversity and would welcome a well-designed Wildlife Ordinance founded on scientific research, **I do not support *this Wildlife Ordinance*** as it is neither of those.

I urge the PLUM Committee, the City Council, and the Planning Department to respect the will of the affected residents of the proposed WLD, who overwhelmingly oppose the Wildlife Ordinance in its current incarnation, as evidenced by their comments submitted to the Planning Department and the City Planning Commission.

I would strongly prefer that the PLUM Committee reject the current incarnation of the Wildlife Ordinance in its entirety, and direct City Planning to draft a Wildlife Ordinance that relies upon scientific research to better protect Wildlife and Biodiversity without unduly burdening the ordinary homeowner. However, if that will not be done, I wish to express my vehement opposition to the following regulations contained in the current proposed Wildlife Ordinance, and in Councilmembers Yaroslavsky's and Ramen's letter to the PLUM Committee.

1. **I OPPOSE** the failure of the Wildlife Ordinance to promulgate different regulations for undeveloped/pristine lots and those lots which have already been developed.

This failure results in insufficient protections for undeveloped/ pristine land of high habitat and/or biodiversity value, combined with overly burdensome regulation of homes on already developed parcels that have limited habitat or biodiversity value.

2. **I OPPOSE** the proposal put forth by Councilmembers Yaroslavsky and Ramen to reinstate the disallowance of RFA for slopes greater than 60% (aka 31 degrees) contained in Version 2 of the Wildlife Ordinance.

This proposal for a blanket reduction in allowed home size on steeper lots is a classic example of regulatory overkill.

Simply put, there is no nexus between home size, slope steepness, and wildlife habitat destruction where the home is on an already developed parcel with an existing pad, as is the case of the majority of homes in the WLD. Absent additional

grading, which is already regulated under other sections of the Wildlife Ordinance, this reduction in allowable home size severely negatively impacts homeowners while providing minimal benefit to wildlife or biodiversity.

Most homes in my neighborhood have slopes greater than 60% (31 degrees), and most of these homes are relatively small in size. Reducing allowable home size for the majority of our residents will prevent needed increases in home size to accommodate growing families, aging parents, and home offices for remote work. The larger homes that exist in our community will be rendered non-conforming, with the attendant mortgage and insurance difficulties.

Moreover, this heavy-handed reduction in allowable home size would only worsen the City's housing shortage. The California Department of Housing & Community Development (HCD) has already warned the City that reducing RFA below its current level would likely violate California Government Code Section 66300, subdivision (b)(1)(A).

3. **I OPPOSE** the regulation in **Section E(1)(b)** which defines additions of greater than 500sf as a Project under the Wildlife Ordinance.

This 500sf threshold is entirely too low and is applied regardless of the size of the existing home. As a result, it unreasonably burdens the owners of smaller, older homes, such as those that constitute the majority of homes in our neighborhood. Additionally, it encourages homeowners who need more space to sell their homes rather than enlarge them, which is not only detrimental to neighborhood cohesiveness but also has the presumably unintended consequence of increasing the risk that the homes will be bought by developers who will build the largest home they can. At a minimum, additions that would result in homes of less than 3,500sf or 75% of allowed RFA should be exempted from this regulation.

4. **I OPPOSE** the regulation in **Section E(1)(c)** which defines Major Remodels as a Project under the Wildlife Ordinance.

Homeowners with smaller, older homes, similar to most in our neighborhood, will face an unjustifiable burden due to the applicability of the Major Remodel threshold. Bringing these homes up to current standards and building codes significantly increases the likelihood of exceeding the Major Remodel threshold. Consequently, it is crucial to exempt owner-occupied homes of a certain age from this category of Project.

5. **I OPPOSE** the requirement in **Section E(1)(e)** and **Section F.1(f)**, as to non-native trees only, that 2 new trees be planted for the removal of each non-native Significant (aka large) tree.

This regulation poses a significant fire hazard. Section 4906.4.2 of the 2023 California Fire Code (presumably to be adopted by the City in the near future) requires that the dripline at maturity of any newly planted trees be at least 10 feet away from structures and the dripline of other trees. By requiring a two-for-one tree replacement for the removal of large non-indigenous trees, this regulation would require homeowners with small building pads to plant trees that will violate best fire safety practices and fire regulations, or on steeper parts of the property where they cannot be readily maintained in a fire-safe manner.

Further, the native flora in the WLD is primarily chaparral - large native trees are generally only found in riparian areas. While there are many parts of Los Angeles that are in need of additional trees, the WLD is not one of them. A far better approach would be to require homeowners who remove large non-native trees to contribute to a fund dedicated to providing trees to areas where such trees are actually needed, and where they would not be public safety hazard, or jeopardize a homeowners ability to obtain fire insurance.

Additionally, both the increased fire danger (and the increased bird strikes, as noted in the City's own PAWS report) resulting from this regulation would disallow a CEQA exemption for this Ordinance.

6. **I OPPOSE** the requirement in **Section F.1(f)**, as to non-native trees only, that prohibits grading or construction within the dripline of a Significant (aka large) tree.

Where the dripline of a large non-native tree extends over a home, this regulation would unreasonably interfere with homeowners' ability to remodel their homes. Furthermore, as previously stated, the WLD does not require protection for non-native trees, making this requirement both unnecessary and burdensome..

7. **I OPPOSE** the requirement in **Section F.1(j)** that requires trash cans to be stored in a building or special enclosure.

According to the Los Angeles Municipal Code (LAMC) and the Planning Department, these trash can enclosures would be considered structures and thus prohibited in side and front setback areas. Consequently, they would need to be situated in the central portion of homeowners' backyards. Most homes in our neighborhood are on small pads with small or non-existent back yards, and some back yards are only reachable by stairs. Having odorous and unsightly trash cans enclosures in the middle of our small back yards is untenable, as is dragging them up and down stairs - especially for the elderly or disabled. Storing odorous, insect-attracting trash cans in the garage is equally unacceptable.

Additionally, given that Wildlife intrusion into trash cans stored behind fences on homeowners' properties is extremely rare, and that Wildlife resistant latches are readily available for under \$20, this regulation is wholly unreasonable.

8. **I OPPOSE** the requirement in **Section F.1(j)** for Site Plan Review for homes resulting in greater than 6,000sf.

The 6,000sf threshold is too low. The Planning Department has stated that the *average* new/rebuilt home in the WLD is over 6,000sf, consequently this regulation would require that the *majority* of new/rebuilt homes undergo Site Plan Review.

9. **I OPPOSE** the failure of **Section H.3** to provide for a simplified review process in cases where a Resource is erroneously mapped and does not actually exist in the mapped location and/or where it is clear that the Project would have a negligible impact on the Resource.

The Planning Department has not verified that the Resources are accurately mapped, and the Wildlife Ordinance unreasonably shifts this burden to the homeowner at the significant expense and difficult of a Site Plan Review and Biological Assessment. See Exhibit 1 for examples.

10. **I OPPOSE** the failure of **Section E.1** to exclude homes destroyed by casualties other than natural disasters (e.g. cooking or electrical fires) from the Wildlife Ordinance regulations.

This failure is entirely unreasonable and will result in homeowners having difficulty obtaining mortgages or refinancing.

11. **I OPPOSE** the failure of **F.1(e)(2)** to utilize R1 and R2 Zoning rather than lot size in determining which parcels are subject to the Wildlife Ordinance's Lot Coverage regulations, and to give an overly generous Lot Coverage allowance to large parcels.

Many RE zoned homes in the WLD are on lots that are smaller than R1/R2 lots. Our neighborhood, although zoned primarily RE-15, has several such lots (e.g. lots of 6,000sf - 7000sf) and these homeowners would be greatly burdened by the application of a 50% Lot Coverage limit to their properties.

This burden on homeowners of smaller parcels is especially galling in the face of the absolute gift to developers of mega-mansions of up to 100,000sf of Lot Coverage for larger parcels. It is these mega-mansion Projects that have a negative impact on Wildlife and Biodiversity, not the small parcel home.

12. **I OPPOSE** the regulation in **Section F.1(c)(2)(i)(a)** to the extent that it would prohibit stairs and decks on slopes greater than 100% (aka 45 degrees).

Prohibiting stairs on these slopes creates a public safety hazard. Prohibiting stairs would render it difficult/dangerous for property owners to reach areas of their property for brush clearance and other property maintenance. Further, this regulation restricts homeowners' access to their own property, and as such constitutes a taking.

Many homes on steeper slopes have very small flat pads and are in neighborhoods with no sidewalks and limited access to recreational areas. Decks provide the opportunity for outdoor living space while leaving the land below the deck available for use by wildlife.

13. **I OPPOSE** Councilmembers Yaroslavsky's and Ramen's proposal to revert to Version 2's inclusion of non-Open Space designated City-owned vacant land in the definition of Open Space.

Per the Planning Department, this change would place Resource Buffers on approximately 1000 adjacent parcels, requiring the owners of those adjacent parcels to undergo expensive and time-consuming Site Plan Review for Projects. The mere fact that the City owns the unimproved parcel does not justify this result, especially where the City itself has declined to designate the parcel as Open Space.

14. **I OPPOSE** the proposal put forth by Councilmembers Yaroslavsky and Ramen to reinstate the disallowance of a basement exemption, contrary to CPC recommendations. I propose basement exemptions that equal the footprint of the ground/main level of the home. This will not affect wildlife or biodiversity and should remain an option to property owners, especially since they are not allowed to utilize SB9 or 10, due to other area conditions.

I sincerely hope that the above explanation of the impacts of just some of the proposed regulations makes clear that the current version of the Wildlife Ordinance is deeply flawed.

Joan Rimmon
Homeowner

Communication from Public

Name: Daniel

Date Submitted: 06/19/2023 10:24 PM

Council File No: 14-0518

Comments for Public Posting: Dear Honorable Members and Los Angeles City Planning Staff, I live within the proposed Wildlife Supplemental Use District (“WLD”), a fully developed and well-established neighborhood, whose homes are primarily smaller 1950’s ranch homes on large steep lots with small building pads. While I recognize the need for protection of Wildlife and Biodiversity and would welcome a well-designed Wildlife Ordinance founded on scientific research, I do not support this Wildlife Ordinance as it is neither of those. I urge the PLUM Committee, the City Council, and the Planning Department to respect the will of the affected residents of the proposed WLD, who overwhelmingly oppose the Wildlife Ordinance in its current incarnation, as evidenced by their comments submitted to the Planning Department and the City Planning Commission. I would strongly prefer that the PLUM Committee reject the current incarnation of the Wildlife Ordinance in its entirety, and direct City Planning to draft a Wildlife Ordinance that relies upon scientific research to better protect Wildlife and Biodiversity without unduly burdening the ordinary homeowner. However, if that will not be done, I wish to express my vehement opposition to the following regulations contained in the current proposed Wildlife Ordinance, and in Councilmembers Yaroslavsky’s and Ramen’s letter to the PLUM Committee. 1. I OPPOSE the failure of the Wildlife Ordinance to promulgate different regulations for undeveloped/pristine lots and those lots which have already been developed. This failure results in insufficient protections for undeveloped/ pristine land of high habitat and/or biodiversity value, combined with overly burdensome regulation of homes on already developed parcels that have limited habitat or biodiversity value. 2. I OPPOSE the proposal put forth by Councilmembers Yaroslavsky and Ramen to reinstate the disallowance of RFA for slopes greater than 60% (aka 31 degrees) contained in Version 2 of the Wildlife Ordinance. This proposal for a blanket reduction in allowed home size on steeper lots is a classic example of regulatory overkill. Simply put, there is no nexus between home size, slope steepness, and wildlife habitat destruction where the home is on an already developed parcel with an existing pad, as is the case of the majority of homes in the WLD. Absent additional grading, which is already regulated under other sections of the Wildlife

Ordinance, this reduction in allowable home size severely negatively impacts homeowners while providing minimal benefit to wildlife or biodiversity. Most homes in my neighborhood have slopes greater than 60% (31 degrees), and most of these homes are relatively small in size. Reducing allowable home size for the majority of our residents will prevent needed increases in home size to accommodate growing families, aging parents, and home offices for remote work. The larger homes that exist in our community will be rendered non-conforming, with the attendant mortgage and insurance difficulties. Moreover, this heavy-handed reduction in allowable home size would only worsen the City's housing shortage. The California Department of Housing & Community Development (HCD) has already warned the City that reducing RFA below its current level would likely violate California Government Code Section 66300, subdivision (b)(1)(A).

3. I OPPOSE the regulation in Section E(1)(b) which defines additions of greater than 500sf as a Project under the Wildlife Ordinance. This 500sf threshold is entirely too low and is applied regardless of the size of the existing home. As a result, it unreasonably burdens the owners of smaller, older homes, such as those that constitute the majority of homes in our neighborhood. Additionally, it encourages homeowners who need more space to sell their homes rather than enlarge them, which is not only detrimental to neighborhood cohesiveness but also has the presumably unintended consequence of increasing the risk that the homes will be bought by developers who will build the largest home they can. At a minimum, additions that would result in homes of less than 3,500sf or 75% of allowed RFA should be exempted from this regulation.

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June 19th, 2023

Via Email and Messenger

Los Angeles City Council, PLUM Committee, and Los Angeles City Planning

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Simply put, there is no nexus between home size, slope steepness, and wildlife habitat destruction where the home is on an already developed parcel with an existing pad, as is the case of the majority of homes in the WLD. Absent additional grading, which is already regulated under other sections of the Wildlife Ordinance, this reduction in allowable home size severely negatively impacts homeowners while providing minimal benefit to wildlife or biodiversity.

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Moreover, this heavy-handed reduction in allowable home size would only worsen the City's housing shortage. The California Department of Housing & Community Development (HCD) has already warned the City that reducing RFA below its current level would likely violate California Government Code Section 66300, subdivision (b)(1)(A).

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This regulation poses a significant fire hazard. Section 4906.4.2 of the 2023 California Fire Code (presumably to be adopted by the City in the near future) requires that the dripline at maturity of any newly planted trees be at least 10 feet away from structures and the dripline of other trees. By requiring a two-for-one tree replacement for the removal of large non-indigenous trees, this regulation would require homeowners with small building pads to plant trees that will violate best fire safety practices and fire regulations, or on steeper parts of the property where they cannot be readily maintained in a fire-safe manner.

Further, the native flora in the WLD is primarily chaparral - large native trees are generally only found in riparian areas. While there are many parts of Los Angeles that are in need of additional trees, the WLD is not one of them. A far better approach would be to require homeowners who remove large non-native trees to contribute to a fund dedicated to providing trees to areas where such trees are actually needed, and where they would not be public safety hazard, or jeopardize a homeowners ability to obtain fire insurance.

Additionally, both the increased fire danger (and the increased bird strikes, as noted in the City's own PAWS report) resulting from this regulation would disallow a CEQA exemption for this Ordinance.

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According to the Los Angeles Municipal Code (LAMC) and the Planning Department, these trash can enclosures would be considered structures and thus prohibited in side and front setback areas. Consequently, they would need to be situated in the central portion of homeowners' backyards. Most homes in our neighborhood are on small pads with small or non-existent back yards, and some back yards are only reachable by stairs. Having odorous and unsightly trash cans enclosures in the middle of our small back yards is untenable, as is dragging them up and down stairs -

especially for the elderly or disabled. Storing odorous, insect-attracting trash cans in the garage is equally unacceptable.

Additionally, given that Wildlife intrusion into trash cans stored behind fences on homeowners' properties is extremely rare, and that Wildlife resistant latches are readily available for under \$20, this regulation is wholly unreasonable.

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The 6,000sf threshold is too low. The Planning Department has stated that the *average* new/rebuilt home in the WLD is over 6,000sf, consequently this regulation would require that the *majority* of new/rebuilt homes undergo Site Plan Review.

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The Planning Department has not verified that the Resources are accurately mapped, and the Wildlife Ordinance unreasonably shifts this burden to the homeowner at the significant expense and difficulty of a Site Plan Review and Biological Assessment. See Exhibit 1 for examples.

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This failure is entirely unreasonable and will result in homeowners having difficulty obtaining mortgages or refinancing.

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Many RE zoned homes in the WLD are on lots that are smaller than R1/R2 lots. Our neighborhood, although zoned primarily RE-15, has several such lots (e.g. lots of 6,000sf - 7000sf) and these homeowners would be greatly burdened by the application of a 50% Lot Coverage limit to their properties.

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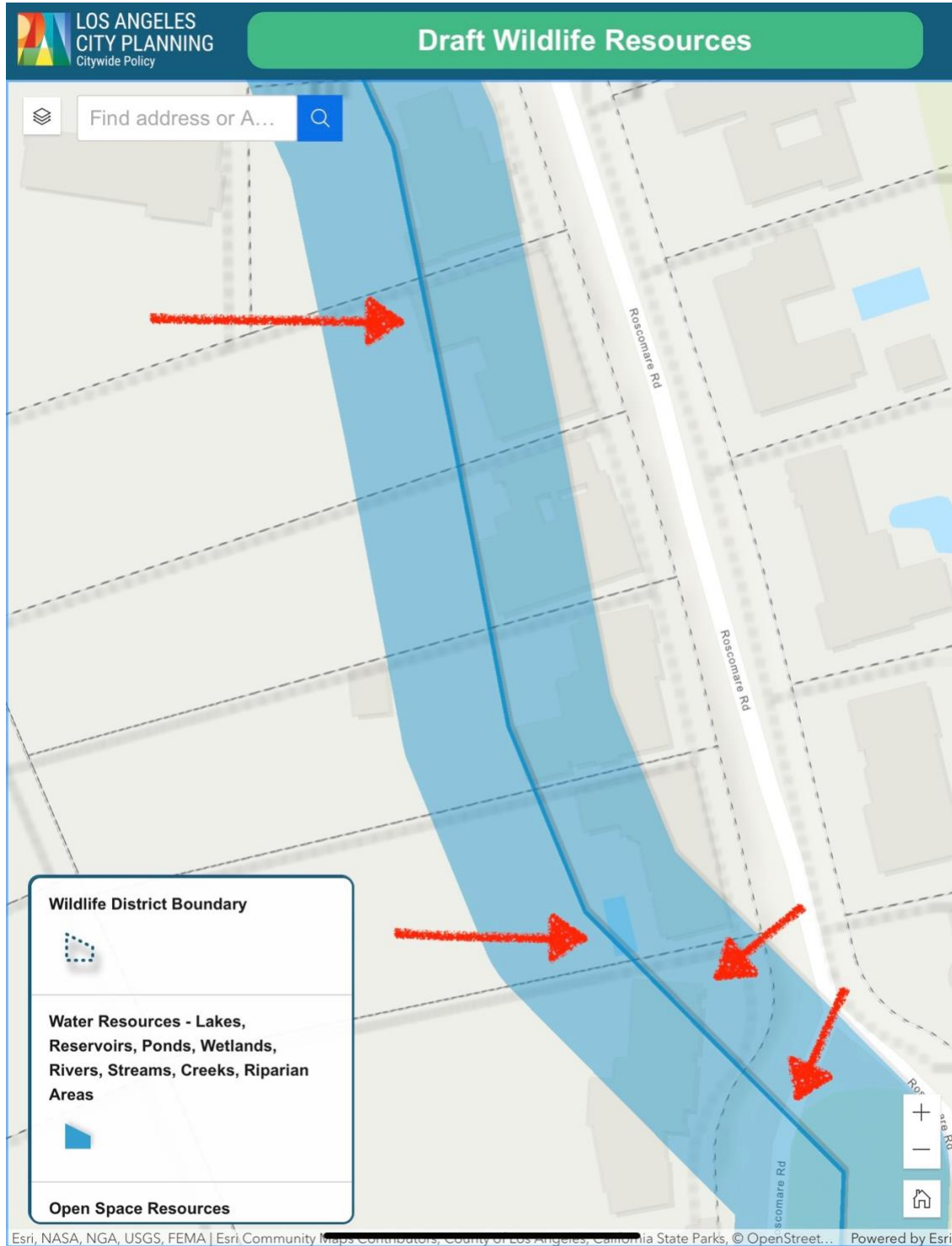
Sincerely,

Daniel Neman

Example of Erroneous Wildlife Resource in Bel Air Hills,
depicting stream traversing homes, pools, and Roscomare Road.

The Wildlife Resource so depicted does not exist.

Source: Current Planning Department Wildlife Resource Map, captured on November 14th, 2022

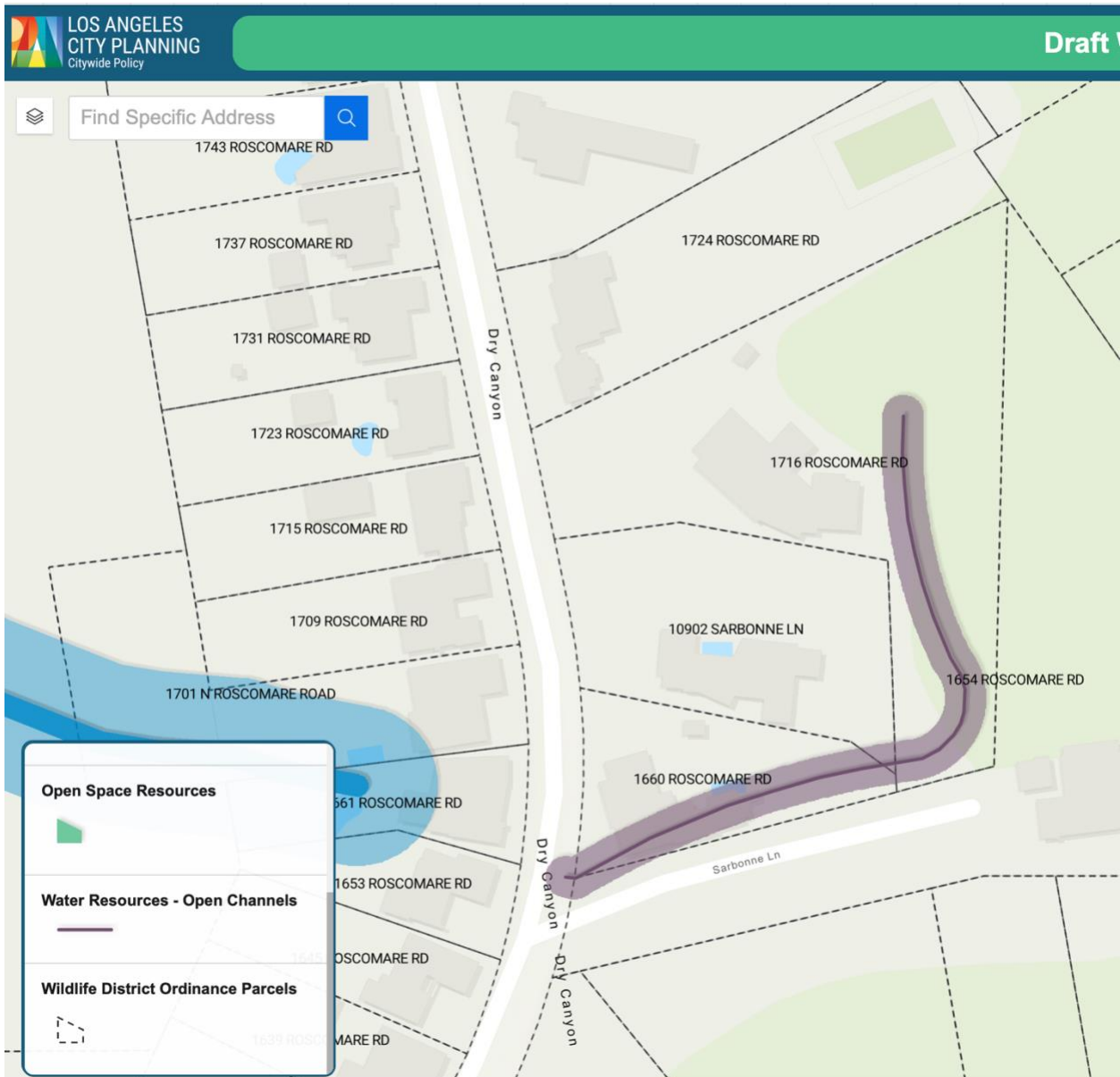


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Source: Current Planning Department Wildlife Resource Map, captured on June 19th, 2023



Communication from Public

Name:

Date Submitted: 06/19/2023 10:26 PM

Council File No: 14-0518

Comments for Public Posting: My comments and opinions as well as literally my neighbor on every single side of me is attached. Please understand nobody in our area wants this and we will be absolutely without a doubt pursuing legal action if any iteration of this is approved.

June 19th, 2023

Via Email and Messenger

Los Angeles City Council, PLUM Committee, and Los Angeles City Planning

RE: THE PROPOSED DRAFT WILDLIFE ORDINANCE (CF 14-0518)

Dear Honorable Members and Los Angeles City Planning Staff,

I live within the proposed Wildlife Supplemental Use District ("WLD"), a fully developed and well-established neighborhood, whose homes are primarily smaller 1950's ranch homes on large steep lots with small building pads.

While I recognize the need for protection of Wildlife and Biodiversity and would welcome a well-designed Wildlife Ordinance founded on scientific research, **I do not support *this Wildlife Ordinance*** as it is neither of those.

I urge the PLUM Committee, the City Council, and the Planning Department to respect the will of the affected residents of the proposed WLD, who overwhelmingly oppose the Wildlife Ordinance in its current incarnation, as evidenced by their comments submitted to the Planning Department and the City Planning Commission.

I would strongly prefer that the PLUM Committee reject the current incarnation of the Wildlife Ordinance in its entirety, and direct City Planning to draft a Wildlife Ordinance that relies upon scientific research to better protect Wildlife and Biodiversity without unduly burdening the ordinary homeowner. However, if that will not be done, I wish to express my vehement opposition to the following regulations contained in the current proposed Wildlife Ordinance, and in Councilmembers Yaroslavsky's and Ramen's letter to the PLUM Committee.

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This failure results in insufficient protections for undeveloped/ pristine land of high habitat and/or biodiversity value, combined with overly burdensome regulation of homes on already developed parcels that have limited habitat or biodiversity value.

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This proposal for a blanket reduction in allowed home size on steeper lots is a classic example of regulatory overkill.

Simply put, there is no nexus between home size, slope steepness, and wildlife habitat destruction where the home is on an already developed parcel with an existing pad, as is the case of the majority of homes in the WLD. Absent additional grading, which is already regulated under other sections of the Wildlife Ordinance, this reduction in allowable home size severely negatively impacts homeowners while providing minimal benefit to wildlife or biodiversity.

Most homes in my neighborhood have slopes greater than 60% (31 degrees), and most of these homes are relatively small in size. Reducing allowable home size for the majority of our residents will prevent needed increases in home size to accommodate growing families, aging parents, and home offices for remote work. The larger homes that exist in our community will be rendered non-conforming, with the attendant mortgage and insurance difficulties.

Moreover, this heavy-handed reduction in allowable home size would only worsen the City's housing shortage. The California Department of Housing & Community Development (HCD) has already warned the City that reducing RFA below its current level would likely violate California Government Code Section 66300, subdivision (b)(1)(A).

3. **I OPPOSE** the regulation in **Section E(1)(b)** which defines additions of greater than 500sf as a Project under the Wildlife Ordinance.

This 500sf threshold is entirely too low and is applied regardless of the size of the existing home. As a result, it unreasonably burdens the owners of smaller, older homes, such as those that constitute the majority of homes in our neighborhood. Additionally, it encourages homeowners who need more space to sell their homes rather than enlarge them, which is not only detrimental to neighborhood cohesiveness but also has the presumably unintended consequence of increasing the risk that the homes will be bought by developers who will build the largest home they can. At a minimum, additions that would result in homes of less than 3,500sf or 75% of allowed RFA should be exempted from this regulation.

4. **I OPPOSE** the regulation in **Section E(1)(c)** which defines Major Remodels as a Project under the Wildlife Ordinance.

Homeowners with smaller, older homes, similar to most in our neighborhood, will face an unjustifiable burden due to the applicability of the Major Remodel threshold. Bringing these homes up to current standards and building codes significantly increases the likelihood of exceeding the Major Remodel threshold. Consequently, it is crucial to exempt owner-occupied homes of a certain age from this category of Project.

5. **I OPPOSE** the requirement in **Section E(1)(e)** and **Section F.1(f)**, as to non-native trees only, that 2 new trees be planted for the removal of each non-native Significant (aka large) tree.

This regulation poses a significant fire hazard. Section 4906.4.2 of the 2023 California Fire Code (presumably to be adopted by the City in the near future) requires that the dripline at maturity of any newly planted trees be at least 10 feet away from structures and the dripline of other trees. By requiring a two-for-one tree replacement for the removal of large non-indigenous trees, this regulation would require homeowners with small building pads to plant trees that will violate best fire safety practices and fire regulations, or on steeper parts of the property where they cannot be readily maintained in a fire-safe manner.

Further, the native flora in the WLD is primarily chaparral - large native trees are generally only found in riparian areas. While there are many parts of Los Angeles that are in need of additional trees, the WLD is not one of them. A far better approach would be to require homeowners who remove large non-native trees to contribute to a fund dedicated to providing trees to areas where such trees are actually needed, and where they would not be public safety hazard, or jeopardize a homeowners ability to obtain fire insurance.

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6. **I OPPOSE** the requirement in **Section F.1(f)**, as to non-native trees only, that prohibits grading or construction within the dripline of a Significant (aka large) tree.

Where the dripline of a large non-native tree extends over a home, this regulation would unreasonably interfere with homeowners' ability to remodel their homes. Furthermore, as previously stated, the WLD does not require protection for non-native trees, making this requirement both unnecessary and burdensome..

7. **I OPPOSE** the requirement in **Section F.1(j)** that requires trash cans to be stored in a building or special enclosure.

According to the Los Angeles Municipal Code (LAMC) and the Planning Department, these trash can enclosures would be considered structures and thus prohibited in side and front setback areas. Consequently, they would need to be situated in the central portion of homeowners' backyards. Most homes in our neighborhood are on small pads with small or non-existent back yards, and some back yards are only reachable by stairs. Having odorous and unsightly trash cans enclosures in the middle of our small back yards is untenable, as is dragging them up and down stairs -

especially for the elderly or disabled. Storing odorous, insect-attracting trash cans in the garage is equally unacceptable.

Additionally, given that Wildlife intrusion into trash cans stored behind fences on homeowners' properties is extremely rare, and that Wildlife resistant latches are readily available for under \$20, this regulation is wholly unreasonable.

8. **I OPPOSE** the requirement in **Section F.1(j)** for Site Plan Review for homes resulting in greater than 6,000sf.

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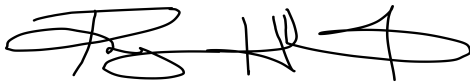
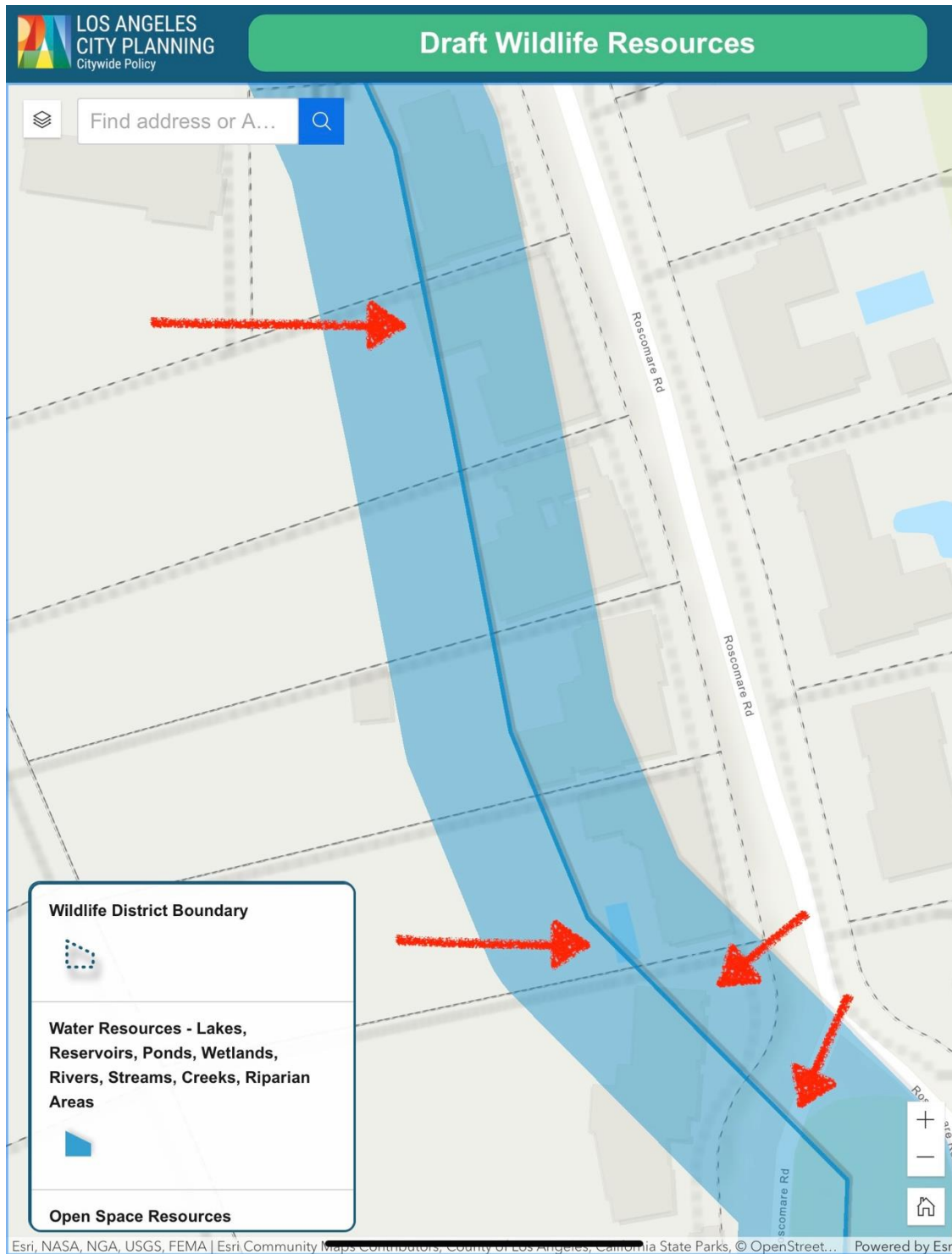
A handwritten signature in black ink, appearing to be 'Ramen', written over a horizontal line.

Exhibit 1

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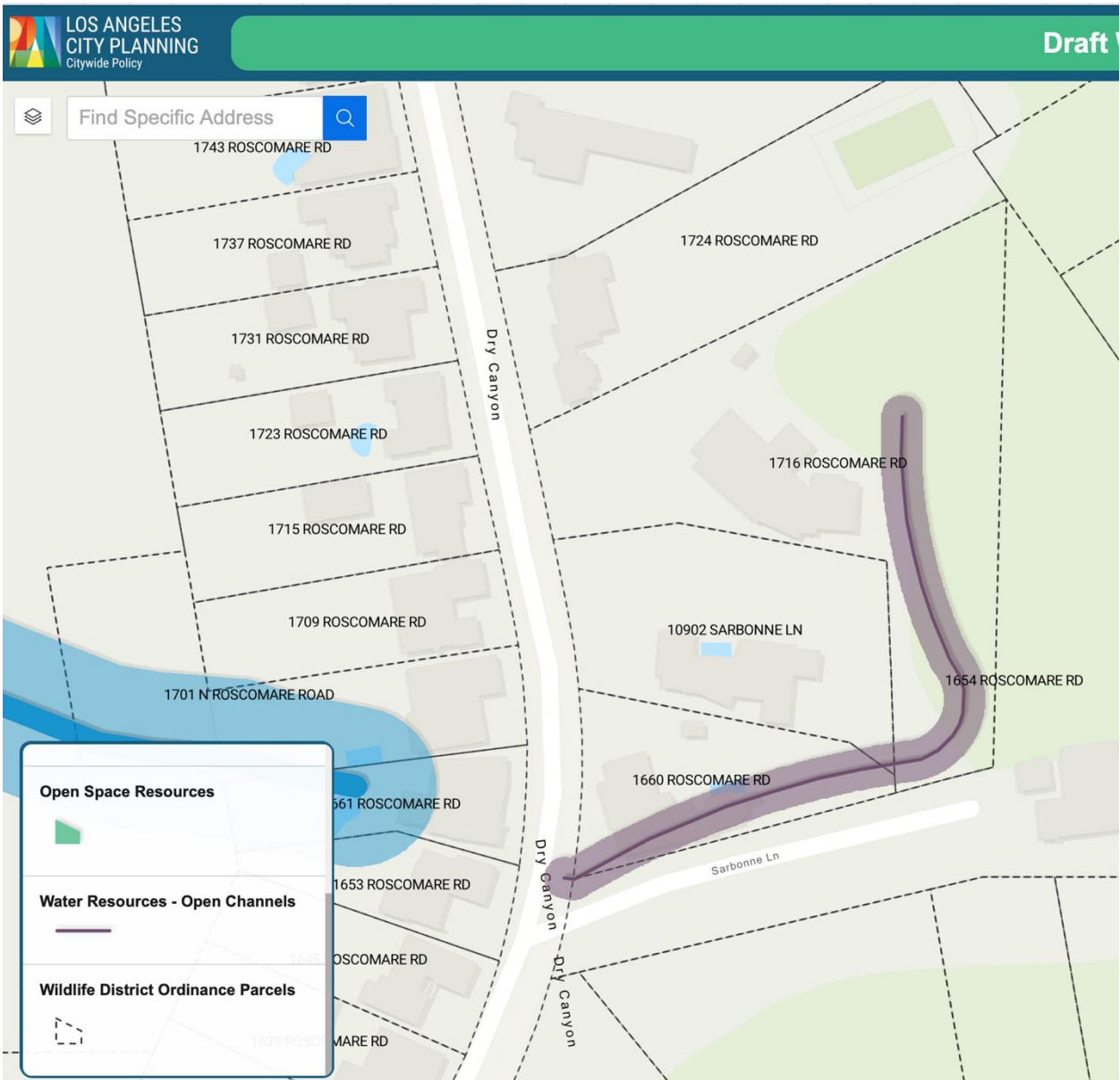
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Communication from Public

Name: Tom Sherman Oaks resident

Date Submitted: 06/19/2023 10:29 PM

Council File No: 14-0518

Comments for Public Posting: This ordinance is not ready! There are no guidelines on what criteria the certified biologists or committee should use to approve or deny a project. The public should be provided with all the rules in detail before you pass a new ordinance. My other comments are attached as this space is limited to 5,000 characters please read and take into consideration the comments by the affected home owners not just out-of-area folks that love the name of this anti-building ordinance.

Dear Honorable Members and Los Angeles City Planning Staff,

I live within the proposed Wildlife Supplemental Use District (“WLD”), a fully developed and well-established neighborhood, whose homes are primarily smaller 1950’s ranch homes on large steep lots with small building pads.

While I recognize the need for protection of Wildlife and Biodiversity and would welcome a well-designed Wildlife Ordinance founded on scientific research, **I do not support *this Wildlife Ordinance*** as it is neither of those.

I urge the PLUM Committee, the City Council, and the Planning Department to respect the will of the affected residents of the proposed WLD, who overwhelmingly oppose the Wildlife Ordinance in its current incarnation, as evidenced by their comments submitted to the Planning Department and the City Planning Commission.

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Sincerely,

Tom, Sherman oaks resident

Communication from Public

Name:

Date Submitted: 06/19/2023 10:49 PM

Council File No: 14-0518

Comments for Public Posting: See attached letter for my comments

June 19th, 2023

Via Email and Messenger

Los Angeles City Council, PLUM Committee, and Los Angeles City Planning
RE: THE PROPOSED DRAFT WILDLIFE ORDINANCE (CF 14-0518)

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Additionally, given that Wildlife intrusion into trash cans stored behind fences on homeowners' properties is extremely rare, and that Wildlife resistant latches are readily available for under \$20, this regulation is wholly unreasonable.

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I sincerely hope that the above explanation of the impacts of just some of the proposed regulations makes clear that the current version of the Wildlife Ordinance is deeply flawed.

Sincerely,

Peter Lowry

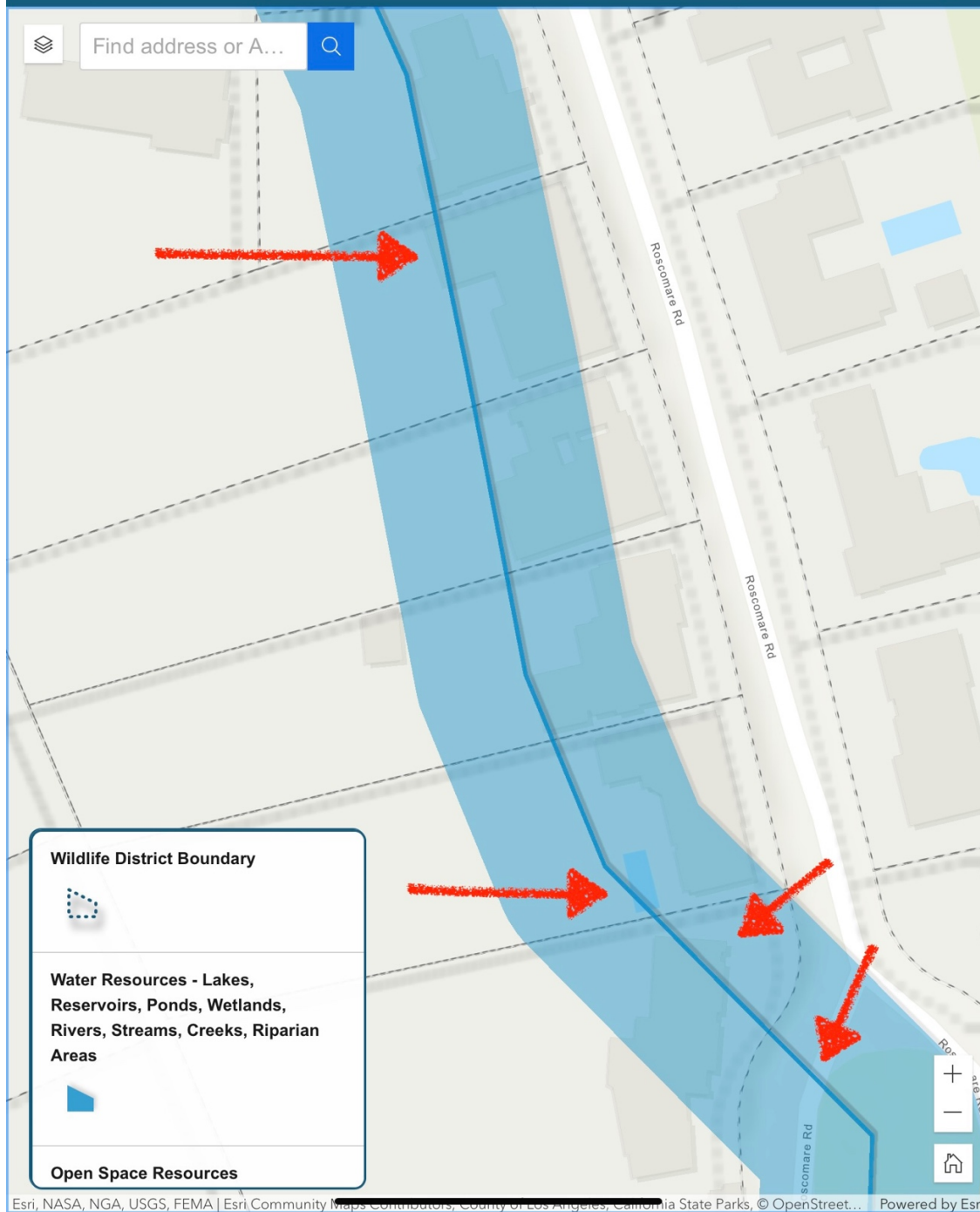
Homeowner

Exhibit 1

Example of Erroneous Wildlife Resource in Bel Air Hills,
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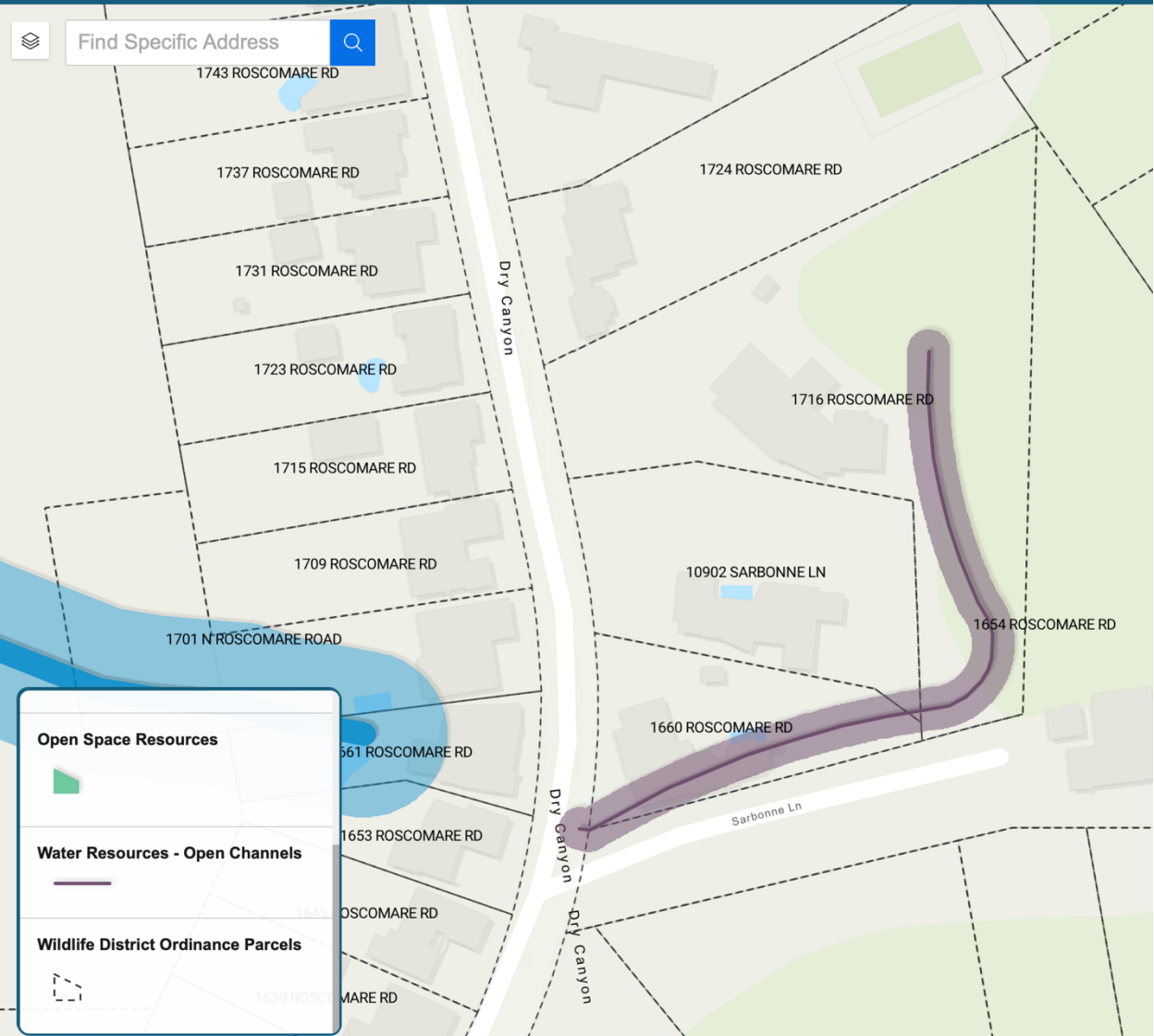
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Source: Current Planning Department Wildlife Resource Map, captured on November 14th, 2022



Example of Erroneous Wildlife Resource in Bel Air Hills,
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Source: Current Planning Department Wildlife Resource Map, captured on June 19th, 2023



Communication from Public

Name: Gilad Ganish

Date Submitted: 06/19/2023 10:52 PM

Council File No: 14-0518

Comments for Public Posting: I recognize the need for protection of wildlife and biodiversity and would welcome a well-designed Wildlife Ordinance founded on scientific research, but I do not support this Wildlife Ordinance as it is neither of those.

June 19th, 2023

Via Email

Los Angeles City Council, PLUM Committee, and Los Angeles City Planning

RE: THE PROPOSED DRAFT WILDLIFE ORDINANCE (CF 14-0518)

Dear Honorable Members and Los Angeles City Planning Staff,

We own several properties within the proposed Wildlife Supplemental Use District (“WLD”), a fully developed and well-established neighborhood, whose homes are primarily smaller 1950’s ranch homes on large steep lots with small building pads.

While I recognize the need for protection of wildlife and biodiversity and would welcome a well-designed Wildlife Ordinance founded on scientific research, **I do not support *this* Wildlife Ordinance** as it is neither of those.

I urge the PLUM Committee, the City Council, and the Planning Department to respect the will of the affected residents of the proposed WLD, who overwhelmingly oppose the Wildlife Ordinance in its current incarnation, as evidenced by their comments submitted to the Planning Department and the City Planning Commission.

I would strongly prefer that the PLUM Committee reject the current incarnation of the Wildlife Ordinance in its entirety, and direct City Planning to draft a Wildlife Ordinance that relies upon scientific research to better protect Wildlife and Biodiversity without unduly burdening the ordinary homeowner. However, if that will not be done, I wish to express my vehement opposition to the following regulations contained in the current proposed Wildlife Ordinance, and in Councilmembers Yaroslavsky’s and Ramen’s letter to the PLUM Committee.

1. **I OPPOSE** the failure of the Wildlife Ordinance to promulgate different regulations for undeveloped/pristine lots and those lots which have already been developed.

This failure results in insufficient protections for undeveloped/ pristine land of high habitat and/or biodiversity value, combined with overly burdensome regulation of homes on already developed parcels that have limited habitat or biodiversity value.

2. **I OPPOSE** the proposal put forth by Councilmembers Yaroslavsky and Ramen to reinstate the disallowance of RFA for slopes greater than 60% (aka 31 degrees) contained in Version 2 of the Wildlife Ordinance.

This proposal for a blanket reduction in allowed home size on steeper lots is a classic example of regulatory overkill with no relevant reasoning.

Simply put, there is no nexus between home size, slope steepness, and wildlife habitat destruction where the home is on an already developed parcel with an existing pad, as is the case of the majority of homes in the WLD. Absent additional grading, which is already regulated under other sections of the Wildlife Ordinance, this reduction in allowable home size severely negatively impacts homeowners while providing minimal benefit to wildlife or biodiversity.

Most homes in my neighborhood have slopes greater than 60% (31 degrees), and most of these homes are relatively small in size. Reducing allowable home size for the majority of our residents will prevent needed increases in home size to accommodate growing families, aging parents, and home offices for remote work. The larger homes that exist in our community will be rendered non-conforming, with the attendant mortgage and insurance difficulties.

Moreover, this heavy-handed reduction in allowable home size would only worsen the City's housing shortage. The California Department of Housing & Community Development (HCD) has already warned the City that reducing RFA below its current level would likely violate California Government Code Section 66300, subdivision (b)(1)(A).

3. **I OPPOSE** the regulation in **Section E(1)(b)** which defines additions of greater than 500sf as a Project under the Wildlife Ordinance.

This 500sf threshold is entirely too low and is applied regardless of the size of the existing home. As a result, it unreasonably burdens the owners of smaller, older homes, such as those that constitute the majority of homes in our neighborhood. Additionally, it encourages homeowners who need more space to sell their homes rather than enlarge them, which is not only detrimental to neighborhood cohesiveness but also has the presumably unintended consequence of increasing the risk that the homes will be bought by developers who will build the largest home they can. At a minimum, additions that would result in homes of less than 3,500sf or 75% of allowed RFA should be exempted from this regulation.

4. **I OPPOSE** the regulation in **Section E(1)(c)** which defines Major Remodels as a Project under the Wildlife Ordinance.

Homeowners with smaller, older homes, similar to most in our neighborhood, will face an unjustifiable burden due to the applicability of the Major Remodel threshold. Bringing these homes up to current standards and building codes significantly increases the likelihood of exceeding the Major Remodel threshold. Consequently, it is crucial to exempt owner-occupied homes of a certain age from this category of Project.

5. **I OPPOSE** the requirement in **Section E(1)(e)** and **Section F.1(f)**, as to non-native trees only, that 2 new trees be planted for the removal of each non-native Significant (aka large) tree.

This regulation poses a significant fire hazard. Section 4906.4.2 of the 2023 California Fire Code (presumably to be adopted by the City in the near future) requires that the dripline at maturity of any newly planted trees be at least 10 feet away from structures and the dripline of other trees. By requiring a two-for-one tree replacement for the removal of large non-indigenous trees, this regulation would require homeowners with small building pads to plant trees that will violate best fire safety practices and fire regulations, or on steeper parts of the property where they cannot be readily maintained in a fire-safe manner.

Further, the native flora in the WLD is primarily chaparral - large native trees are generally only found in riparian areas. While there are many parts of Los Angeles that are in need of additional trees, the WLD is not one of them. A far better approach would be to require homeowners who remove large non-native trees to contribute to a fund dedicated to providing trees to areas where such trees are actually needed, and where they would not be public safety hazard, or jeopardize a homeowner's ability to obtain fire insurance.

Additionally, both the increased fire danger (and the increased bird strikes, as noted in the City's own PAWS report) resulting from this regulation would disallow a CEQA exemption for this Ordinance.

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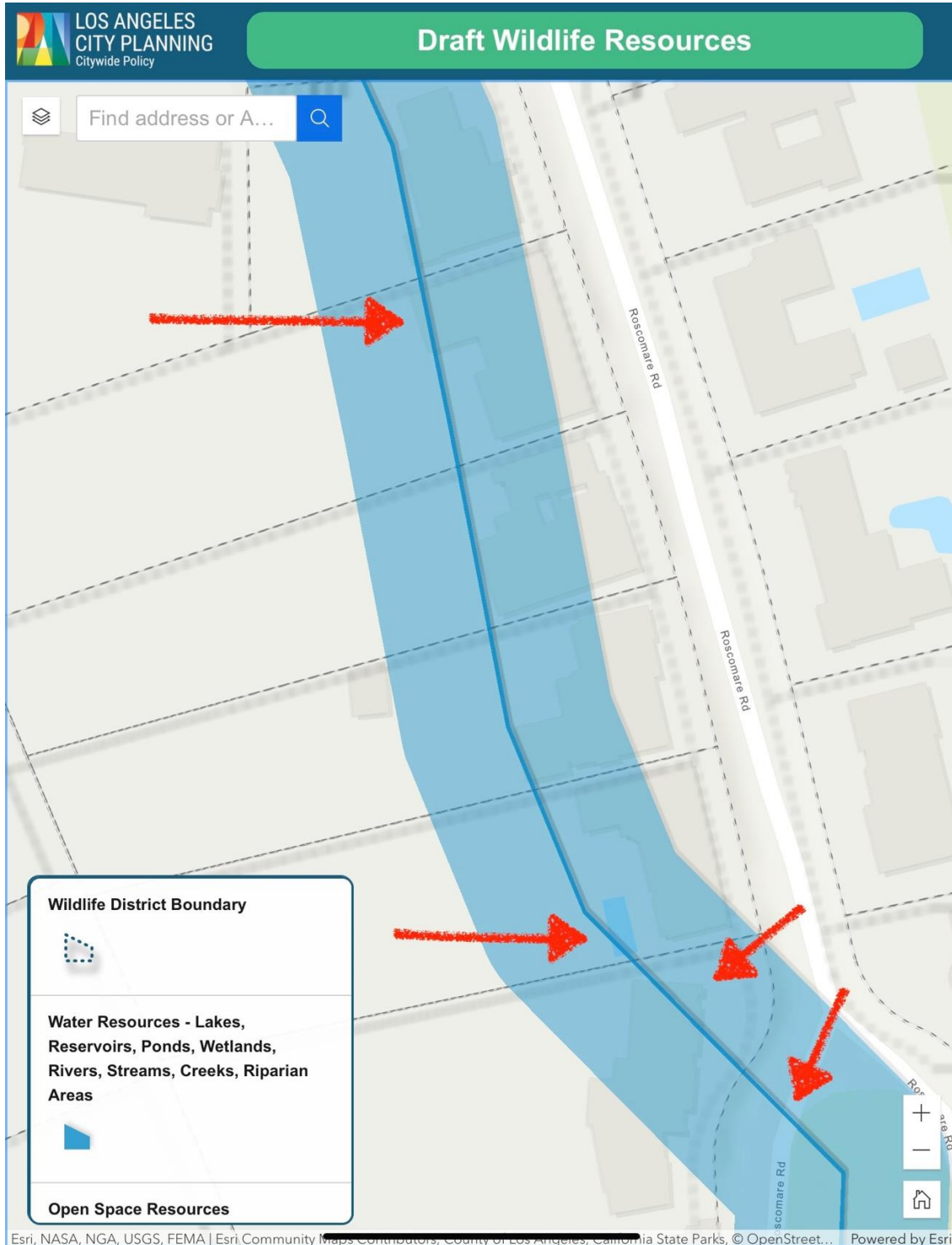
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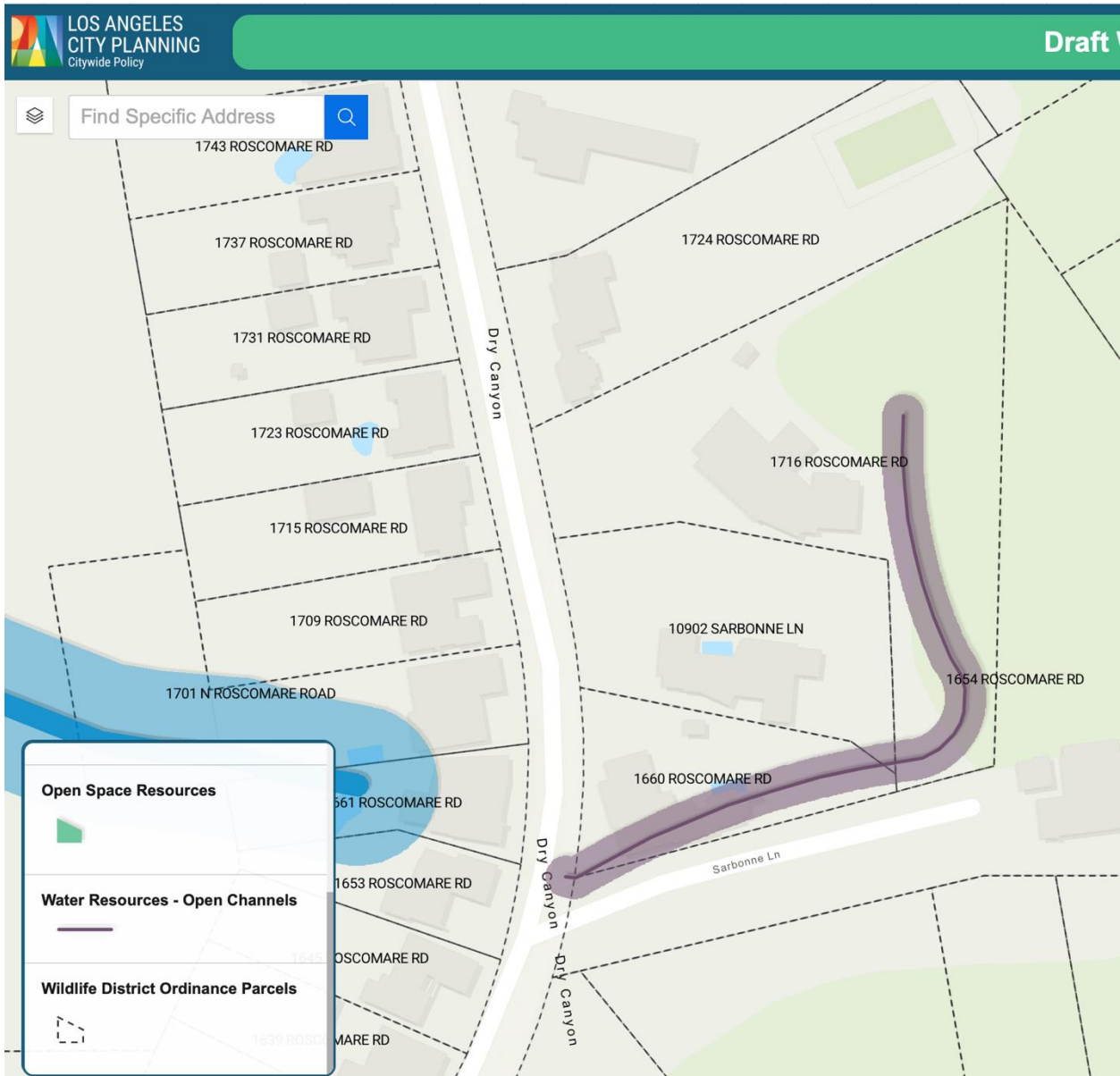
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Source: Current Planning Department Wildlife Resource Map, captured on June 19th, 2023



Communication from Public

Name:

Date Submitted: 06/19/2023 10:56 PM

Council File No: 14-0518

Comments for Public Posting: (Please see attached letter) Firstly, I ask that you please remove the Wildlife Ordinance from the June 20, 2023 2:00 pm meeting agenda until proper outreach has been conducted with all of your constituents. I'm not able to attend an in-person meeting due to work commitments. None of my neighbors knew about this meeting. As a homeowner in the Santa Monica Mountains for over 22 years I am not opposed to reasonable policy for promoting wildlife and open space protection. I am a wildlife advocate and a former wildlife volunteer. We and many of our neighbors already do a lot to protect wildlife as many of our properties are official wildlife habitats. Our street alone has an abundance of wildlife from bobcats, mule deer, coyotes, California Quail and the largest of raptors; the great horned owls. In fact, I can say I have only seen an increase of critters year after year. And If you're serious about protecting wildlife, I'd say you would do more to enforce the leaf blower ban. The harms to wildlife that I saw as a wildlife rehab volunteer were injured by cars, rat poison, leaf blowers, and off season tree trimming. This wildlife ordinance does not work to preserve large open spaces. In fact there is no research to show this ordinance and the regulation it is trying to impose on us does much to protect wildlife. This ordinance will gravely affect small property owners like us, not the mega mansion developers your committee are claiming to be going after. Reducing people's buildable size by 50% is an outrageous downzoning, extremely financially harmful to us and completely unnecessary. We ask the PLUM Committee to send this ordinance back to the planning department to be fully vetted, to have the parts of the rules removed that don't directly help wildlife and to expand those elements that truly help our wildlife—by formally designating our open areas, to plot out how to connect these habitats and corridors in a way that keeps wildlife out of harm's way, and efforts that true wildlife research & experts have suggested will help LA maintain its unique and wonderful access to nature. Our property and many in our community should serve as an example to many at City Hall; we already are good stewards, our property is already a protected wildlife habitat, and we can coexist with wildlife, but this wildlife ordinance does nothing to further protect wildlife. This ordinance needs more research and more work. It harms us small

homeowners and will force many to sell to big developers. Thank
you. Respectfully, Claudia H Sherman Oaks, CA

June 19th, 2023

Via Email and Messenger

Los Angeles City Council, PLUM Committee, and Los Angeles City Planning
RE: THE PROPOSED DRAFT WILDLIFE ORDINANCE (CF 14-0518)

Dear Honorable Members and Los Angeles City Planning Staff,

I live within the proposed Wildlife Supplemental Use District ("WLD"), a fully developed and well-established neighborhood, whose homes are primarily smaller 1950's ranch homes on large steep lots with small building pads.

While I recognize the need for protection of Wildlife and Biodiversity and would welcome a well-designed Wildlife Ordinance founded on scientific research, **I do not support *this Wildlife Ordinance*** as it is neither of those.

I urge the PLUM Committee, the City Council, and the Planning Department to respect the will of the affected residents of the proposed WLD, who overwhelmingly oppose the Wildlife Ordinance in its current incarnation, as evidenced by their comments submitted to the Planning Department and the City Planning Commission.

I would strongly prefer that the PLUM Committee reject the current incarnation of the Wildlife Ordinance in its entirety, and direct City Planning to draft a Wildlife Ordinance that relies upon scientific research to better protect Wildlife and Biodiversity without unduly burdening the ordinary homeowner. However, if that will not be done, I wish to express my vehement opposition to the following regulations contained in the current proposed Wildlife Ordinance, and in Councilmembers Yaroslavsky's and Ramen's letter to the PLUM Committee.

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This failure results in insufficient protections for undeveloped/ pristine land of high habitat and/or biodiversity value, combined with overly burdensome regulation of homes on already developed parcels that have limited habitat or biodiversity value.

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This proposal for a blanket reduction in allowed home size on steeper lots is a classic example of regulatory overkill.

Simply put, there is no nexus between home size, slope steepness, and wildlife habitat destruction where the home is on an already developed parcel with an existing pad, as is the case of the majority of homes in the WLD. Absent additional grading, which is already regulated under other sections of the Wildlife Ordinance, this reduction in allowable home size severely negatively impacts homeowners while providing minimal benefit to wildlife or biodiversity.

Most homes in my neighborhood have slopes greater than 60% (31 degrees), and most of these homes are relatively small in size. Reducing allowable home size for the majority of our residents will prevent needed increases in home size to accommodate growing families, aging parents, and home offices for remote work. The larger homes that exist in our community will be rendered non-conforming, with the attendant mortgage and insurance difficulties.

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I sincerely hope that the above explanation of the impacts of just some of the proposed regulations makes clear that the current version of the Wildlife Ordinance is deeply flawed.

Sincerely,

Claudia Herrera

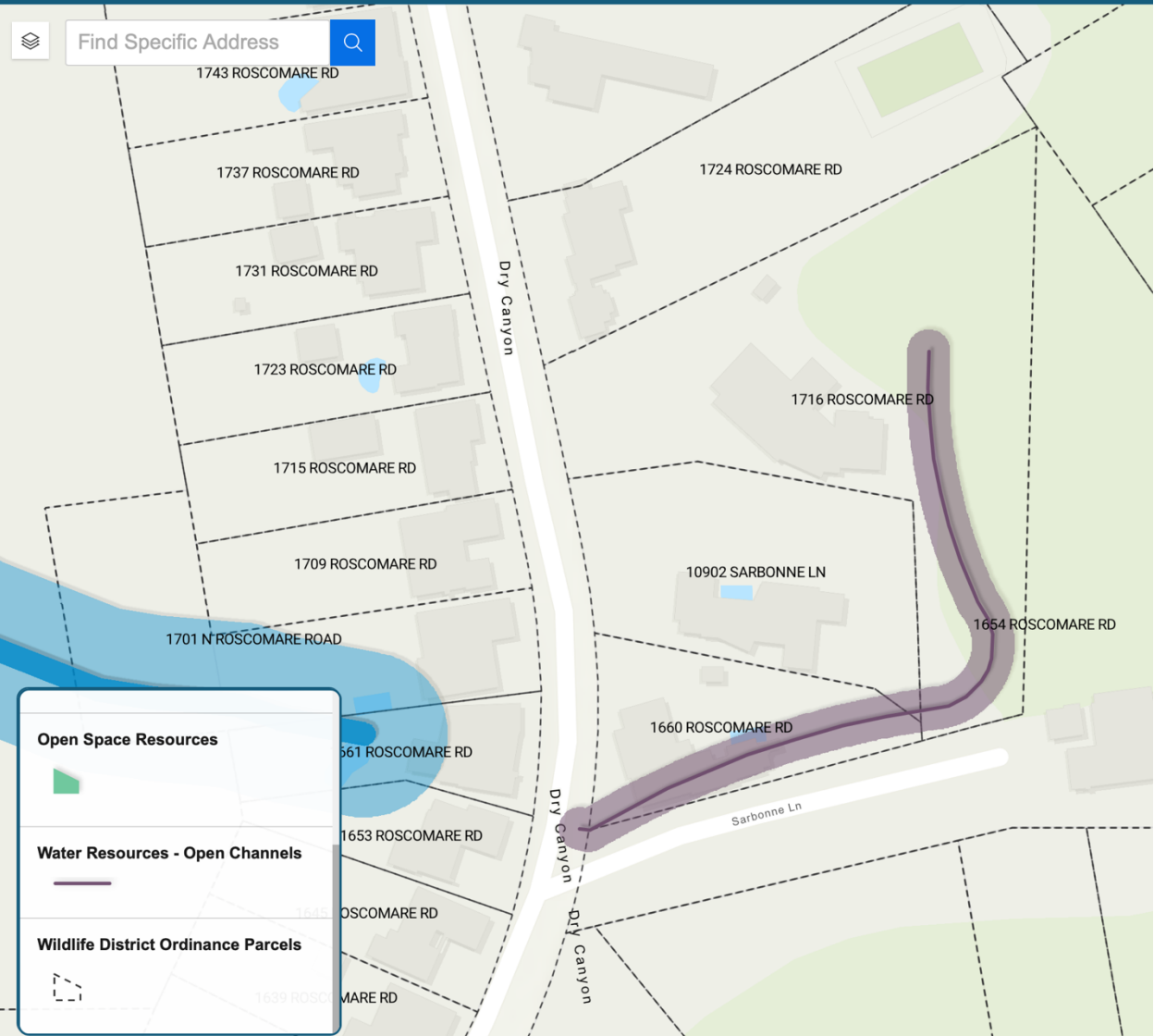
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Communication from Public

Name:

Date Submitted: 06/19/2023 11:04 PM

Council File No: 14-0518

Comments for Public Posting: Honorable Members and Los Angeles City Planning Staff, I live within the proposed Wildlife Supplemental Use District (“WLD”), a fully developed and well-established neighborhood, whose homes are primarily smaller 1950’s ranch homes on large steep lots with small building pads. While I recognize the need for protection of Wildlife and Biodiversity and would welcome a well-designed Wildlife Ordinance founded on scientific research, I do not support this Wildlife Ordinance as it is neither of those. I urge the PLUM Committee, the City Council, and the Planning Department to respect the will of the affected residents of the proposed WLD, who overwhelmingly oppose the Wildlife Ordinance in its current incarnation, as evidenced by their comments submitted to the Planning Department and the City Planning Commission. I would strongly prefer that the PLUM Committee reject the current incarnation of the Wildlife Ordinance in its entirety, and direct City Planning to draft a Wildlife Ordinance that relies upon scientific research to better protect Wildlife and Biodiversity without unduly burdening the ordinary homeowner. However, if that will not be done, I wish to express my vehement opposition to the following regulations contained in the current proposed Wildlife Ordinance, and in Councilmembers Yaroslavsky’s and Ramen’s letter to the PLUM Committee. 1. I OPPOSE the failure of the Wildlife Ordinance to promote different regulations for undeveloped/pristine lots and those lots which have already been developed. This failure results in insufficient protections for undeveloped/ pristine land of high habitat and/or biodiversity value, combined with overly burdensome regulation of homes on already developed parcels that have limited habitat or biodiversity value. 2. I OPPOSE the proposal put forth by Councilmembers Yaroslavsky and Ramen to reinstate the disallowance of RFA for slopes greater than 60% (aka 31 degrees) contained in Version 2 of the Wildlife Ordinance. This proposal for a blanket reduction in allowed home size on steeper lots is a classic example of regulatory overkill. There is no connection between home size, slope steepness, and wildlife habitat destruction where the home is on an already developed parcel with an existing pad, as is the case of the majority of homes in the WLD. This reduction in allowable home size severely negatively impacts homeowners while providing

minimal benefit to wildlife or biodiversity. Most homes in our neighborhood have slopes greater than 60% (31 degrees), and most of these homes are relatively small in size. 3. I OPPOSE the regulation in Section E(1)(b) which defines additions of greater than 500sf as a Project under the Wildlife Ordinance. 4. I OPPOSE the regulation in Section E(1)(c) which defines Major Remodels as a Project under the Wildlife Ordinance. 5. I OPPOSE the requirement in Section E(1)(e) and Section F.1(f), as to non-native trees only, that 2 new trees be planted for the removal of each non-native Significant (aka large) tree. 6. I OPPOSE the requirement in Section F.1(f), as to non-native trees only, that prohibits grading or construction within the dripline of a Significant (aka large) tree. 7. I OPPOSE the requirement in Section Section F.1(j) that requires trash cans to be stored in a building or special enclosure. 8. I OPPOSE the requirement in Section F.1(j) for Site Plan Review for homes resulting in greater than 6,000sf. The 6,000sf threshold is too low. 9. I OPPOSE the failure of Section H.3 to provide for a simplified review process in cases where a Resource is erroneously mapped and does not actually exist in the mapped location and/or where it is clear that the Project would have a negligible impact on the Resource. 10. I OPPOSE the failure of Section E.1 to exclude homes destroyed by casualties other than natural disasters (e.g. cooking or electrical fires) from the Wildlife Ordinance regulations. This failure is entirely unreasonable and will result in homeowners having difficulty obtaining mortgages or refinancing. 11. I OPPOSE the failure of F.1(e)(2) to utilize R1 and R2 Zoning rather than lot size in determining which parcels are subject to the Wildlife Ordinance's Lot Coverage regulations, and to give an overly generous Lot Coverage allowance to large parcels. 12. I OPPOSE the regulation in Section F.1(c)(2)(i)(a) to the extent that it would prohibit stairs and decks on slopes greater than 100% (aka 45 degrees). 13. I OPPOSE Councilmembers Yaroslavsky's and Ramen's proposal to revert to Version 2's inclusion of non-Open Space designated City-owned vacant land in the definition of Open Space. 14. I OPPOSE the proposal put forth by Councilmembers Yaroslavsky and Ramen to reinstate the disallowance of a basement exemption, contrary to CPC recommendations.

RE: THE PROPOSED DRAFT WILDLIFE ORDINANCE (CF 14-0518)

Dear Honorable Members and Los Angeles City Planning Staff,

I live within the proposed Wildlife Supplemental Use District ("WLD"), a fully developed and well-established neighborhood, whose homes are primarily smaller 1950's ranch homes on large steep lots with small building pads.

While I recognize the need for protection of Wildlife and Biodiversity and would welcome a well-designed Wildlife Ordinance founded on scientific research, **I do not support *this Wildlife Ordinance*** as it is neither of those.

I urge the PLUM Committee, the City Council, and the Planning Department to respect the will of the affected residents of the proposed WLD, who overwhelmingly oppose the Wildlife Ordinance in its current incarnation, as evidenced by their comments submitted to the Planning Department and the City Planning Commission.

I would **strongly prefer** that the PLUM Committee reject the current incarnation of the Wildlife Ordinance in its entirety, and direct City Planning to draft a Wildlife Ordinance that relies upon scientific research to better protect Wildlife and Biodiversity **without unduly burdening the ordinary homeowner**.

However, if that will not be done, I wish to express my **vehement opposition** to the following regulations contained in the current proposed Wildlife Ordinance, and in Councilmembers Yaroslavsky's and Ramen's letter to the PLUM Committee.

1. **I OPPOSE** the failure of the Wildlife Ordinance to promulgate different regulations for undeveloped/pristine lots and those lots which have already been developed.

This failure results in insufficient protections for undeveloped/ pristine land of high habitat and/or biodiversity value, combined with **overly burdensome regulation of homes on already developed parcels** that have limited habitat or biodiversity value.

2. **I OPPOSE** the proposal put forth by Councilmembers Yaroslavsky and Ramen to reinstate the disallowance of RFA for slopes greater than 60% (aka 31 degrees) contained in Version 2 of the Wildlife Ordinance.

This proposal for a blanket reduction in allowed home size on steeper lots is a classic example of regulatory overkill.

Simply put, there is no nexus between home size, slope steepness, and wildlife habitat destruction where the home is on an already developed parcel

with an existing pad, as is the case of the majority of homes in the WLD. Absent additional grading, which is already regulated under other sections of the Wildlife Ordinance, this reduction in allowable home size severely negatively impacts homeowners while providing minimal benefit to wildlife or biodiversity.

Most homes in my neighborhood have slopes greater than 60% (31 degrees), and most of these homes are relatively small in size. Reducing allowable home size for the majority of our residents will prevent needed increases in home size to accommodate growing families, aging parents, and home offices for remote work. The larger homes that exist in our community will be rendered non-conforming, with the attendant mortgage and insurance difficulties.

Moreover, this heavy-handed reduction in allowable home size would only worsen the City's housing shortage. The California Department of Housing & Community Development (HCD) has already warned the City that reducing RFA below its current level would likely violate California Government Code Section 66300, subdivision (b)(1)(A).

3. **I OPPOSE** the regulation in **Section E(1)(b)** which defines additions of greater than 500sf as a Project under the Wildlife Ordinance.

This 500sf threshold is entirely too low and is applied regardless of the size of the existing home. As a result, it unreasonably burdens the owners of smaller, older homes, such as those that constitute the majority of homes in our neighborhood. Additionally, it encourages homeowners who need more space to sell their homes rather than enlarge them, which is not only detrimental to neighborhood cohesiveness but also has the presumably unintended consequence of increasing the risk that the homes will be bought by developers who will build the largest home they can. At a minimum, additions that would result in homes of less than 3,500sf or 75% of allowed RFA should be exempted from this regulation.

4. **I OPPOSE** the regulation in **Section E(1)(c)** which defines Major Remodels as a Project under the Wildlife Ordinance.

Homeowners with smaller, older homes, similar to most in our neighborhood, will face an unjustifiable burden due to the applicability of the Major Remodel threshold. Bringing these homes up to current standards and building codes significantly increases the likelihood of exceeding the Major Remodel threshold. Consequently, it is crucial to exempt owner-occupied homes of a certain age from this category of Project.

5. **I OPPOSE** the requirement in **Section E(1)(e)** and **Section F.1(f)**, as to non-native trees only, that 2 new trees be planted for the removal of each non-native Significant (aka large) tree.

This regulation poses a significant fire hazard. Section 4906.4.2 of the 2023 California Fire Code (presumably to be adopted by the City in the near future) requires that the dripline at maturity of any newly planted trees be at least 10 feet away from structures and the dripline of other trees. By requiring a two-for-one tree replacement for the removal of large non-indigenous trees, this regulation would require homeowners with small building pads to plant trees that will violate best fire safety practices and fire regulations, or on steeper parts of the property where they cannot be readily maintained in a fire-safe manner.

Further, the native flora in the WLD is primarily chaparral - large native trees are generally only found in riparian areas. While there are many parts of Los Angeles that are in need of additional trees, the WLD is not one of them. A far better approach would be to require homeowners who remove large non-native trees to contribute to a fund dedicated to providing trees to areas where such trees are actually needed, and where they would not be public safety hazard, or jeopardize a homeowners ability to obtain fire insurance.

Additionally, both the increased fire danger (and the increased bird strikes, as noted in the City's own PAWS report) resulting from this regulation would disallow a CEQA exemption for this Ordinance.

6. **I OPPOSE** the requirement in **Section F.1(f)**, as to non-native trees only, that prohibits grading or construction within the dripline of a Significant (aka large) tree.

Where the dripline of a large non-native tree extends over a home, this regulation would unreasonably interfere with homeowners' ability to remodel their homes. Furthermore, as previously stated, the WLD does not require protection for non-native trees, making this requirement both unnecessary and burdensome.

7. **I OPPOSE** the requirement in **Section F.1(j)** that requires trash cans to be stored in a building or special enclosure.

According to the Los Angeles Municipal Code (LAMC) and the Planning Department, these trash can enclosures would be considered structures and thus prohibited in side and front setback areas. Consequently, they would need to be situated in the central portion of homeowners' backyards. Most homes in our neighborhood are on small pads with small or non-existent back

yards, and some back yards are only reachable by stairs. Having odorous and unsightly trash cans enclosures in the middle of our small back yards is untenable, as is dragging them up and down stairs - especially for the elderly or disabled. Storing odorous, insect-attracting trash cans in the garage is equally unacceptable.

Additionally, given that Wildlife intrusion into trash cans stored behind fences on homeowners' properties is extremely rare, and that Wildlife resistant latches are readily available for under \$20, this regulation is wholly unreasonable.

8. **I OPPOSE** the requirement in **Section F.1(j)** for Site Plan Review for homes resulting in greater than 6,000sf.

The 6,000sf threshold is too low. The Planning Department has stated that the *average* new/rebuilt home in the WLD is over 6,000sf, consequently this regulation would require that the *majority* of new/rebuilt homes undergo Site Plan Review.

9. **I OPPOSE** the failure of **Section H.3** to provide for a simplified review process in cases where a Resource is erroneously mapped and does not actually exist in the mapped location and/or where it is clear that the Project would have a negligible impact on the Resource.

The Planning Department has not verified that the Resources are accurately mapped, and the Wildlife Ordinance unreasonably shifts this burden to the homeowner at the significant expense and difficult of a Site Plan Review and Biological Assessment. See Exhibit 1 for examples.

10. **I OPPOSE** the failure of **Section E.1** to exclude homes destroyed by casualties other than natural disasters (e.g. cooking or electrical fires) from the Wildlife Ordinance regulations.

This failure is entirely unreasonable and will result in homeowners having difficulty obtaining mortgages or refinancing.

11. **I OPPOSE** the failure of **F.1(e)(2)** to utilize R1 and R2 Zoning rather than lot size in determining which parcels are subject to the Wildlife Ordinance's Lot Coverage regulations, and to give an overly generous Lot Coverage allowance to large parcels.

Many RE zoned homes in the WLD are on lots that are smaller than R1/R2 lots. Our neighborhood, although zoned primarily RE-15, has several such

lots (e.g. lots of 6,000sf - 7000sf) and these homeowners would be greatly burdened by the application of a 50% Lot Coverage limit to their properties. This burden on homeowners of smaller parcels is especially galling in the face of the absolute gift to developers of mega-mansions of up to 100,000sf of Lot Coverage for larger parcels. **It is these mega-mansion Projects that have a negative impact on Wildlife and Biodiversity, not the small parcel home.**

12. **I OPPOSE** the regulation in **Section F.1(c)(2)(i)(a)** to the extent that it would prohibit stairs and decks on slopes greater than 100% (aka 45 degrees).

Prohibiting stairs on these slopes creates a public safety hazard. Prohibiting stairs would render it difficult/dangerous for property owners to reach areas of their property for brush clearance and other property maintenance. Further, this regulation restricts homeowners' access to their own property, and as such constitutes a taking.

Many homes on steeper slopes have very small flat pads and are in neighborhoods with no sidewalks and limited access to recreational areas. Decks provide the opportunity for outdoor living space while leaving the land below the deck available for use by wildlife.

13. **I OPPOSE** Councilmembers Yaroslavsky's and Ramen's proposal to revert to Version 2's inclusion of non-Open Space designated City-owned vacant land in the definition of Open Space.

Per the Planning Department, this change would place Resource Buffers on approximately 1000 adjacent parcels, requiring the owners of those adjacent parcels to undergo expensive and time-consuming Site Plan Review for Projects. The mere fact that the City owns the unimproved parcel does not justify this result, especially where the City itself has declined to designate the parcel as Open Space.

14. **I OPPOSE** the proposal put forth by Councilmembers Yaroslavsky and Ramen to reinstate the disallowance of a basement exemption, contrary to CPC recommendations. I propose basement exemptions that equal the footprint of the ground/main level of the home. This will not affect wildlife or biodiversity and should remain an option to property owners, especially since they are not allowed to utilize SB9 or 10, due to other area conditions.

I sincerely hope that the above explanation of the impacts of just some of the proposed regulations makes clear that the current version of the Wildlife Ordinance is deeply flawed.

Thank you for your consideration!!

John Bjerke

Communication from Public

Name: Marcia Hanscom, Defend Ballona Wetlands
Date Submitted: 06/19/2023 11:51 PM
Council File No: 14-0518
Comments for Public Posting: Please see attached letter - from the Defend Ballona Wetlands community coalition, with specific comments in support of our strong support for adoption of the wildlife ordinance you are considering this week, and also ask that you support including the recommendations offered by Council-members Nithya Raman and Katy Yaroslavsky related to that ordinance.



June 19, 2023

The Honorable Marqueece Harris-Dawson, Chair, and
The Honorable Planning & Land Use Management (PLUM) Committee
Los Angeles City Council

Re: Council File #14-0518 – Wildlife Ordinance - #19 on PLUM agenda of 6.20.23

Dear Council PLUM members:

On behalf of the Defend Ballona Wetlands community coalition, I write to express our strong support for adoption of the wildlife ordinance you are considering this week, and also ask that you support including the recommendations offered by Councilmembers Nithya Raman and Katy Yaroslavsky related to that ordinance. An important portion of the pilot project area includes headwaters canyons that are part of the Ballona River/Creek/Wetlands watershed, and we know from documentation by scientists naturalists that wildlife travel between those hillside canyons and the Ballona Wetlands, city coastal lagoons and other habitats in CD11, where our work is focused.

Los Angeles is within an area that is considered a biodiversity hotspot, which signifies that the rich biodiversity which has been documented by so many, including the City of LA's own Sanitation and Environment Department, is at serious risk of being eliminated or at least severely diminished.

In fact, this wildlife ordinance is necessary to stave off such an eventuality that will occur if leaders like you don't take action to make a serious course correction. We just can't pave over every last piece of earth here and expect that the natural heritage we have here will be preserved. In fact, this wildlife ordinance is the first of numerous steps that must be taken to protect the biodiversity that we live with here in Los Angeles, which includes numerous rare, imperiled and even endangered species.

322 Culver Blvd., #317 • Playa del Rey, CA 90293

***PLUM COMMITTEE Los Angeles City Council From: Defend Ballona Wetlands
Re: Council File #14-0518 – Wildlife Ordinance - #19 on PLUM agenda of 6.20.23***

June 19, 2023 – page 2

The recommendations put forward by Council Districts 4 & 5 track with the last draft of the ordinance that the Los Angeles City Planning Department proposed last year, and we know from participating in this years-long process that this plan is workable, as well as being the most protective of wildlife corridors that can possibly move forward now.

Please support the recommendations of CDs 4 & 5, and then vote “yes” to adopt this important ordinance. Passage of such an ordinance would be the best possible outcome for what we believe the majority of citizens in Los Angeles want – to protect our wild animals and their habitat to the greatest extent we possibly can.

Thank you for your service on the PLUM Committee of the Los Angeles City Council, and we appreciate in advance your consideration of our request.

Sincerely,

/s/ *Marcia Hanscom*

Marcia Hanscom
Community Organizer
Defend Ballona Wetlands!
(310) 877-2634