

## Communication from Public

**Name:** Karin Benson

**Date Submitted:** 06/19/2023 02:04 PM

**Council File No:** 14-0518

**Comments for Public Posting:** I strongly support the Wildlife Ordinance along with the amendments proposed by Council Districts 4 and 5. It will help wildlife survive in our Santa Monica Mountains through carefully crafted development standards that protect both wildlife and property interests. I encourage the swift adoption of this district ordinance so that it can be expanded to sensitive habitat throughout the entire City of Los Angeles. There are thousands of species of plants and animals that make their homes in the Santa Monica Mountains. Some can only be found in this area. Others are at risk of going extinct such as our local population of mountain lions. All of them are affected by sprawling development. This ordinance will ensure that our local flora and fauna maintain access to the connected habitat needed to thrive. Sprawling development in very high fire severity zones has continually increased the frequency and intensity of fires. Preserving natural open space can help reduce this fire risk by reducing irresponsibly crowded development. Preserving habitat is beneficial for people, native plants and wildlife. PLEASE SUPPORT THE WILDLIFE ORDINANCE!

## Sample letter of support for Council File Number 14-0518

I strongly support the Wildlife Ordinance along with the amendments proposed by Council Districts 4 and 5. It will help wildlife survive in our Santa Monica Mountains through carefully crafted development standards that protect both wildlife and property interests. I encourage the swift adoption of this district ordinance so that it can be expanded to sensitive habitat throughout the entire City of Los Angeles. There are thousands of species of plants and animals that make their homes in the Santa Monica Mountains. Some can only be found in this area. Others are at risk of going extinct such as our local population of mountain lions. All of them are affected by sprawling development. This ordinance will ensure that our local flora and fauna maintain access to the connected habitat needed to thrive. Sprawling development in very high fire severity zones has continually increased the frequency and intensity of fires. Preserving natural open space can help reduce this fire risk by reducing irresponsibly crowded development. Preserving habitat is beneficial for people, native plants and wildlife.

Please support the Wildlife Ordinance.

## Communication from Public

**Name:** Jamie T. Hall

**Date Submitted:** 06/19/2023 02:32 PM

**Council File No:** 14-0518

**Comments for Public Posting:** Please see the attached letter in strong support of the Wildlife Ordinance.





*A Non-Profit Organization Dedicated to Preserving Open Space in Laurel Canyon*

June 19, 2023

**VIA PUBLIC COMMENT PORTAL**

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

**Re: Support for Wildlife Ordinance; (Council File #14-0518)**

Dear Chair Councilmember Harris-Dawson and PLUM Committee Members:

Laurel Canyon Land Trust (“LCLT”) is happy to strongly support the Wildlife Ordinance (“Ordinance”). It goes without saying that climate change and human encroachment into the natural environment poses an immediate and extreme threat to Los Angeles and the planet at large. Los Angeles City Council members, PLUM Committee members, and many other leaders of this city have emphasized their commitment to shaping Los Angeles into an environmentally aware and friendly city. However, this commitment must also be accompanied by actions. If Los Angeles is to be a leader in the fight against climate change, it is imperative that this Ordinance be adopted without delay.

LCLT believes that the Ordinance, equipped with the modifications proposed by staff and the further revisions proposed in this letter, would ensure a more equitable balance between the residents of Los Angeles and the habitat in which they live. LCLT offers the following comments:

**Comments on Proposed Revisions to Ordinance**

- Open Space Definition: We support the inclusion of city owned parcels as open space. It is important that the definition of open space includes city owned vacant parcels because it improves the protections granted by the city over these parcels, which are more than just vacant lots. They are often home to vibrant and delicate ecosystems, which require equal protection as parks, beaches, and other more obvious natural habitats. If city owned vacant areas were not designated as open space, it would

*Tel: 310-709-9600  
Email: [jamie@lclandtrust.org](mailto:jamie@lclandtrust.org)*

allow development within 25 feet of these City-owned lots without ever triggering Site Plan Review. This would directly result in significant habitat loss.

- Closing Basement Loophole: LCLT strongly supports the provisions of the Ordinance that include basements in a home's RFA calculation. For too long developers have been able to "supersize" a home (causing significant habitat displacement) by creating massive unnecessary basements. This loophole in the BHO (which is harmful to wildlife and flora) should be closed.
- Biological Resource Assessments: LCLT believes that Biological Resource Assessments should be made publicly available online as well as peer reviewed to ensure they are accurate and complete.
- Site Plan Review Threshold: The Ordinance proposes a threshold of 7,500 square feet of Residential Floor Area to trigger Site Plan Review. LCLT suggests that the threshold be reduced to 3,500. A 7,500 square foot home is far too large for Laurel Canyon. Houses of this size are rare and uncommon. We have many small, substandard lots in Laurel Canyon. Yet, even smaller homes can have a significant impact on wildlife and native woodlands.
- Overall Height Limitation: LCLT strongly supports the addition of the "overall height" limitation. Homes that cascade down a hillside with unlimited height displace valuable habitat.
- Significant Trees: LCLT is in strong support of the provisions that require replacement of significant trees. Large, mature trees, regardless of species, play an essential role in the survival of wildlife.

### **Further Suggested Revisions**

LCLT believes that the current draft of the Ordinance has room for improvement and offers the following suggested revisions:

#### **Addition of "Habitat Triggers" for Site Plan Review**

The Ordinance has not successfully achieved ensuring that projects 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. We are 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 many projects that result in significant habitat loss. This is because the City has too narrowly defined “Wildlife Resource” to include only zoned or protected open space and water resources. 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 we strongly contend that the development of these lots should be subject to Site Plan Review.

We are suggesting four potential “habitat triggers.” They include:

- 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)(4)
- Proposed removal of 3 or more protected or significant trees

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### Conclusion

LCLT believes that passing the Wildlife Ordinance with the modifications proposed by staff and the revisions proposed in this letter is a crucial step towards improved environmental responsibility that must be taken immediately. It will afford greater protections to the habitats to which we are obligated to care for and will grant credibility to the city leadership which campaigns on making Los Angeles a leader in environmental awareness and conservation.

I may be contacted at (323) 709-9600 or at [jamie@lclandtrust.org](mailto:jamie@lclandtrust.org) if you have any questions, comments or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Jamie T. Hall".

Jamie T. Hall  
Laurel Canyon Land Trust  
President

### About Us

LCLT is a non-profit organization founded for the purpose of preserving open space and native habitat in Laurel Canyon, a historic and environmental significant community located in the Santa Monica Mountains. Since 2017, LCLT was worked in partnership with other interested parties to acquire over 30 acres of open space to protect and preserve the natural environment.

## Communication from Public

**Name:** Lisa Levinson

**Date Submitted:** 06/19/2023 02:51 PM

**Council File No:** 14-0518

**Comments for Public Posting:** June 19, 2023 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 our 8,000 Los Angeles and 25,000 California supporters of In Defense of Animals, I write to express our strong support for the recommendations offered by Councilmembers Nithya Raman and Katy Yaroslavsky. We appreciate their strong advocacy for biodiversity and wild animals who rely on the open spaces and habitat in the hillsides of the Santa Monica Mountains where this pilot project is proposed, and we agree with their recommendations. These recommendations track with the last draft of the ordinance that the Los Angeles City Planning Department offered last year, and we know from participating in this years-long process that this offering from City Planning during the hearing schedule last year is workable, as well as the most protective of wildlife corridors that we can possibly obtain at this time. We urge you to support the proposal put forth by Councilmembers Raman and Yaroslavsky, as they have taken significant time and effort to understand the issues and to consider 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, Lisa Levinson (Los Angeles resident)  
Campaigns Director [lisa@idausa.org](mailto:lisa@idausa.org) 215-620-2130



## IN DEFENSE OF ANIMALS

June 19, 2023

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 our 8,000 Los Angeles and 25,000 California supporters of In Defense of Animals, I write to express our strong support for the recommendations offered by Councilmembers Nithya Raman and Katy Yaroslavsky. We appreciate their strong advocacy for biodiversity and wild animals who rely on the open spaces and habitat in the hillsides of the Santa Monica Mountains where this pilot project is proposed, and we agree with their recommendations.

These recommendations track with the last draft of the ordinance that the Los Angeles City Planning Department offered last year, and we know from participating in this years-long process that this offering from City Planning during the hearing schedule last year is workable, as well as the most protective of wildlife corridors that we can possibly obtain at this time.

We urge you to support the proposal put forth by Councilmembers Raman and Yaroslavsky, as they have taken significant time and effort to understand the issues and to consider 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,  
Lisa Levinson  
Campaigns Director  
[lisa@idausa.org](mailto:lisa@idausa.org)  
215-620-2130

## Communication from Public

**Name:** Jamie T. Hall

**Date Submitted:** 06/19/2023 06:05 PM

**Council File No:** 14-0518

**Comments for Public Posting:** Please see the attached letter in strong support of the Wildlife Ordinance.



*A Community Organization Dedicated to Improving and Preserving  
the Quality of Life in Laurel Canyon*

June 19, 2023

**VIA PUBLIC COMMENT PORTAL**

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

**Re: Support for Wildlife Ordinance; (Council File #14-0518)**

Dear Chair Councilmember Harris-Dawson and PLUM Committee Members:

The Laurel Canyon Association (“LCA”) is happy to strongly support the Wildlife Ordinance (“Ordinance”). It goes without saying that climate change and human encroachment into the natural environment poses an immediate and extreme threat to Los Angeles and the planet at large. Los Angeles City Council members, PLUM Committee members, and many other leaders of this city have emphasized their commitment to shaping Los Angeles into an environmentally aware and friendly city. However, this commitment must also be accompanied by actions. If Los Angeles is to be a leader in the fight against climate change, it is imperative that this Ordinance be adopted without delay.

LCA believes that the Ordinance, equipped with the modifications proposed by staff and the further revisions proposed in this letter, would ensure a more equitable balance between the residents of Los Angeles and the habitat in which they live. LCA offers the following comments:

**Comments on Proposed Revisions to Ordinance**

- Open Space Definition: We support the inclusion of city owned parcels as open space. It is important that the definition of open space includes city owned vacant parcels because it improves the protections granted by the city over these parcels, which are more than just vacant lots. They are often home to vibrant and delicate ecosystems, which require equal protection as parks, beaches, and other more obvious natural habitats. If



city owned vacant areas were not designated as open space, it would allow development within 25 feet of these City-owned lots without ever triggering Site Plan Review. This would directly result in significant habitat loss.

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- Biological Resource Assessments: LCA believes that Biological Resource Assessments should be made publicly available online as well as peer reviewed to ensure they are accurate and complete.
- Site Plan Review Threshold: The Ordinance proposes a threshold of 7,500 square feet of Residential Floor Area to trigger Site Plan Review. LCA suggests that the threshold be reduced to 3,500. A 7,500 square foot home is far too large for Laurel Canyon. Houses of this size are rare and uncommon. We have many small, substandard lots in Laurel Canyon. Yet, even smaller homes can have a significant impact on wildlife and native woodlands.
- Overall Height Limitation: LCA strongly supports the addition of the "overall height" limitation. Homes that cascade down a hillside with unlimited height displace valuable habitat.
- Significant Trees: LCA is in strong support of the provisions that require replacement of significant trees. Large, mature trees, regardless of species, play an essential role in the survival of wildlife.

### **Further Suggested Revisions**

LCA believes that the current draft of the Ordinance has room for improvement and offers the following suggested revisions:

#### **Addition of "Habitat Triggers" for Site Plan Review**

The Ordinance has not successfully achieved ensuring that projects 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. We are 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 many projects that result in significant habitat loss. This is because the City has too narrowly defined “Wildlife Resource” to include only zoned or protected open space and water resources. 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 we strongly contend that the development of these lots should be subject to Site Plan Review.

We are suggesting four potential “habitat triggers.” They include:

- Placement of lot in a Santa Monica Mountains Conservancy (“SMMC”) mapped “habitat block”
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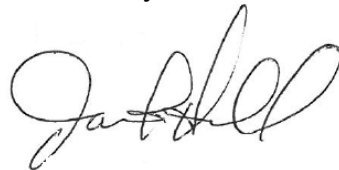
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### Conclusion

LCA believes that passing the Wildlife Ordinance with the modifications proposed by staff and the revisions proposed in this letter is a crucial step towards improved environmental responsibility that must be taken immediately. It will afford greater protections to the habitats to which we are obligated to care for and will grant credibility to the city leadership which campaigns on making Los Angeles a leader in environmental awareness and conservation.

I may be contacted at 310-380-0845 or at [jhall@laurelcanyon.org](mailto:jhall@laurelcanyon.org) if you have any questions, comments or concerns.

Sincerely,



Jamie T. Hall  
Laurel Canyon Association  
President

### About Us

LCA is a neighborhood association serving the area of the Hollywood Hills known as "Laurel Canyon," one the most beautiful and environmentally important areas of Los Angeles. The hills in Laurel Canyon provide a scenic backdrop for the rest of Los Angeles. Further Laurel Canyon's forested valleys and chaparral-draped hillsides offer habit for native wildlife. Laurel Canyon also is home to a watershed and greenbelt for the vastly developed plains of Los Angeles and the San Fernando Valley. LCA was founded for the express purpose of preserving and improving the quality of life in Laurel Canyon. The goal of our community group is to promote the welfare of the residents of Laurel Canyon and to maintain the quality of life in the Hollywood Hills, by preserving its residential character, its quiet, privacy, natural beauty and safety. Moreover, LCA endeavors to encourage cooperation among all residents and to educate appropriate governmental bodies concerning changes in existing or proposed laws affecting Laurel Canyon or in anything that affects the local community.

## **Communication from Public**

**Name:** Gyula Bognar

**Date Submitted:** 06/20/2023 07:24 AM

**Council File No:** 14-0518

**Comments for Public Posting:** I vehemently oppose to the Wildlife Ordinance

June 19<sup>th</sup>, 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 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.

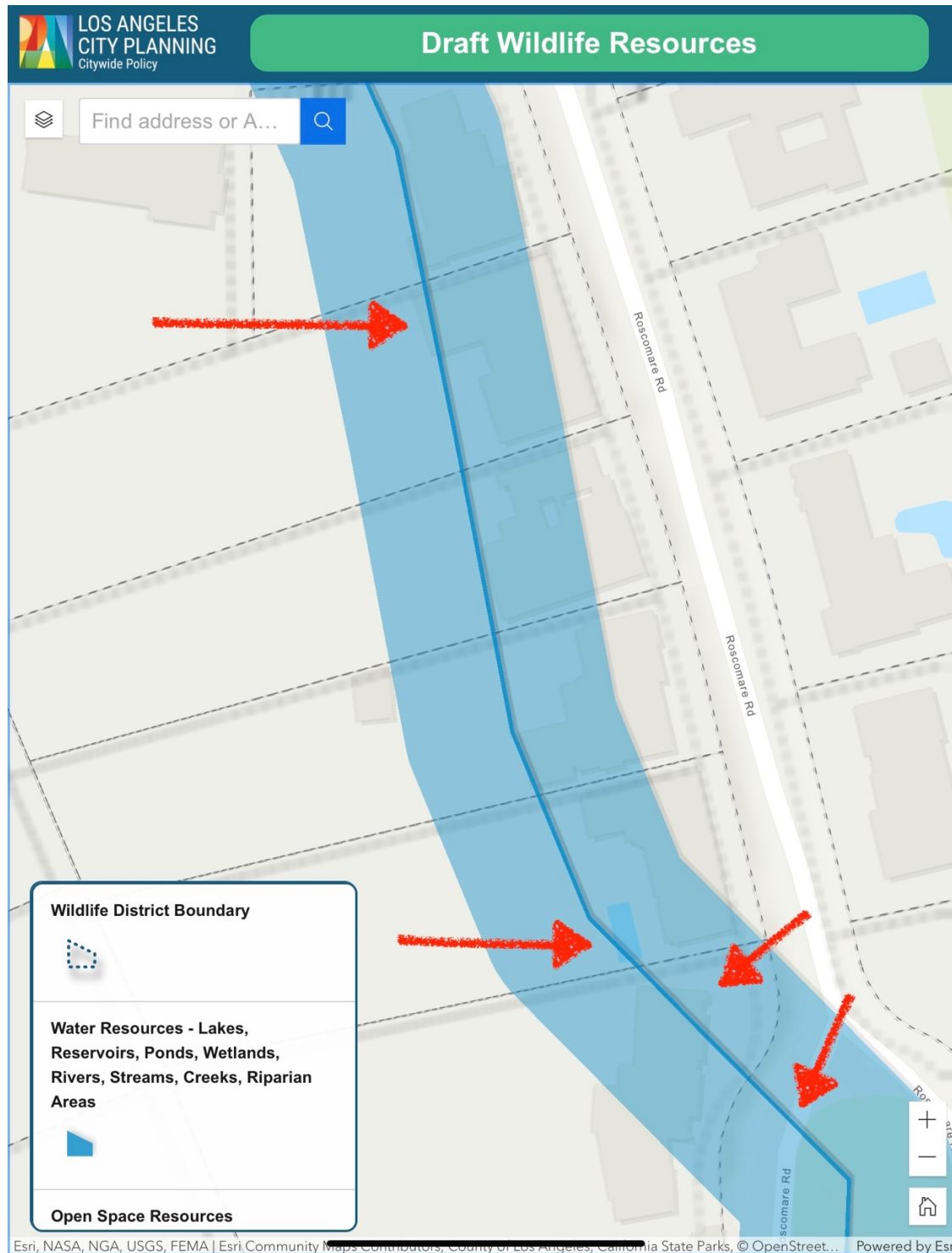
14. **I OPPOSE** the proposal put forth by Councilmembers Yaroslavsky and Ramen to reinstate the disallowance of a basement exemption, contrary to CPC recommendations. I propose basement exemptions that equal the footprint of the ground/main level of the home. This will not affect wildlife or biodiversity 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.

Sincerely,  
Gyula Bogнар (Julius)  
Architectural Designer

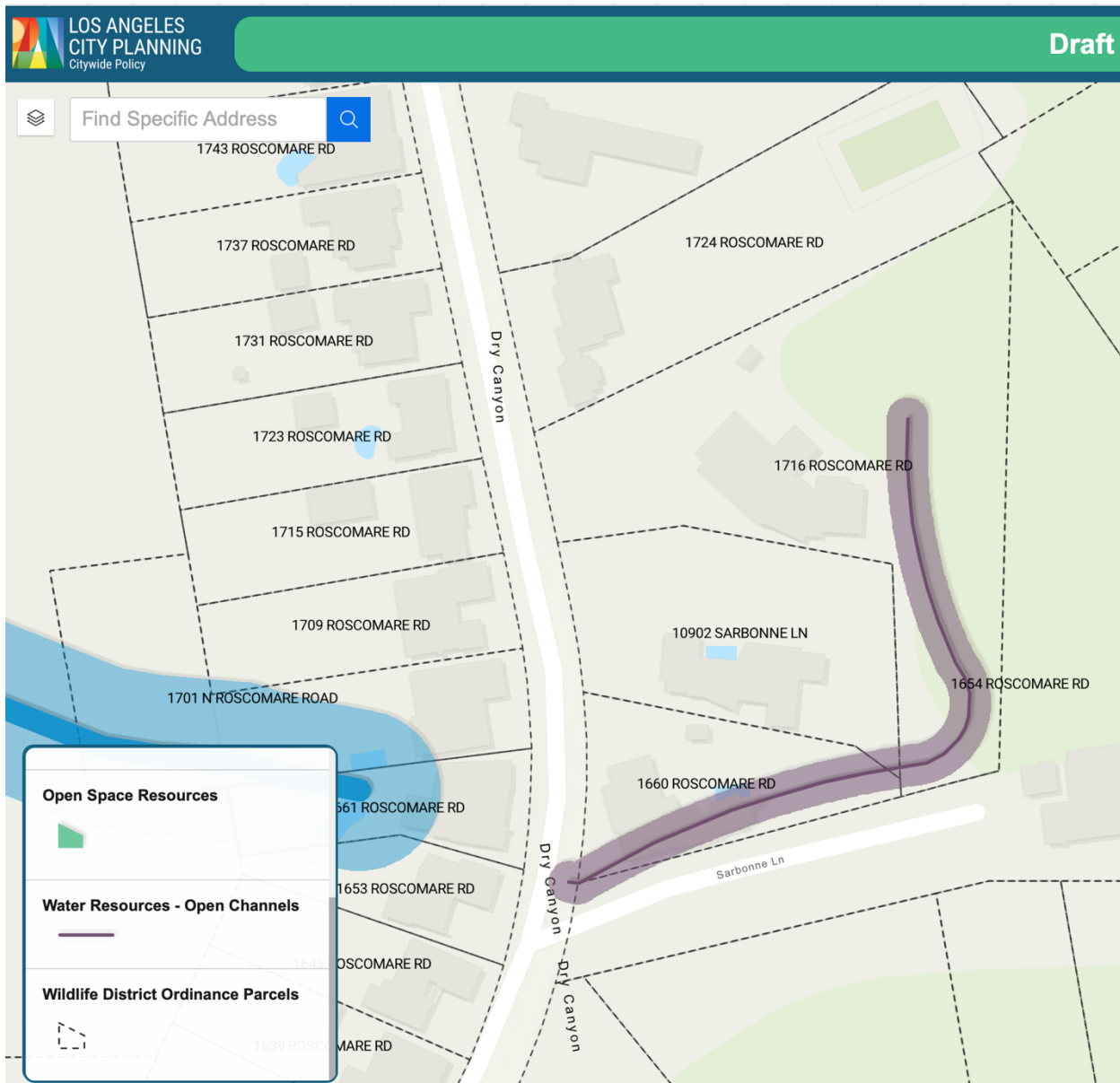


Source: Current Planning Department Wildlife Resource Map, captured on November 14<sup>th</sup>, 2022



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 19<sup>th</sup>, 2023



## **Communication from Public**

**Name:** Mindy Rothstein Mann

**Date Submitted:** 06/19/2023 07:54 PM

**Council File No:** 14-0518

**Comments for Public Posting:** Please see my comments in the attachment

I have lived in Benedict Canyon for almost 40 years. My home falls within the district that will be affected by the Wildlife Ordinance. I have wholeheartedly supported the Ordinance since the pilot study was first introduced 9 years ago.

Los Angeles is blessed with the Santa Monica Mountains, which provides a unique opportunity for residents throughout the city to find an escape from the hustle and bustle of our concrete city. Residents flock to these mountains to hike, to enjoy the views, the clean air, the abundance of trees, and to commune with the wildlife.

Those who are opposed to this ordinance question why the hillsides should be treated differently than the flats. The answer is simple. There are thousands of species of plants and animals that make their home in the Santa Monica Mountains. Some can only be found in this area. Unfortunately, all of them have been affected by sprawling and often irresponsible development in the hillsides. Some are even at risk of going extinct, like our local mountain lions and our native Black Walnut trees.

We need to strike a balance between preserving the dwindling habitat and protecting the rights of homeowners. This latest draft of the ordinance addressed many of the concerns that were voiced by local stakeholders. Personally, I believe that the ordinance needs to be amended so that woodlands are included as a “resource” that triggers Site Plan Review; currently, wildlife resources are limited to water features, open space and open channels. Our woodlands are rapidly disappearing, and they are in dire need of protection.

The Wildlife Ordinance finally offers an opportunity to create sensible land use regulations in the hillsides. It is a starting point, and as a pilot program, it is my hope that we will add further regulations regarding lighting, and that we will also strengthen and refine some of the existing regulations as they relate to setbacks, fencing, and improving connectivity.

The Wildlife Ordinance will contribute to preserving the biodiversity and health of this city and begin the crucial process of focusing on preserving open space. I urge you to pass this important legislation.

## Communication from Public

**Name:** Nader Moshiri

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

**Council File No:** 14-0518

**Comments for Public Posting:** 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 Council members Yaroslavsky's and Ramen's letter to the PLUM Committee. Pls see attached

June 19<sup>th</sup>, 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 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.

Nader Moshiri

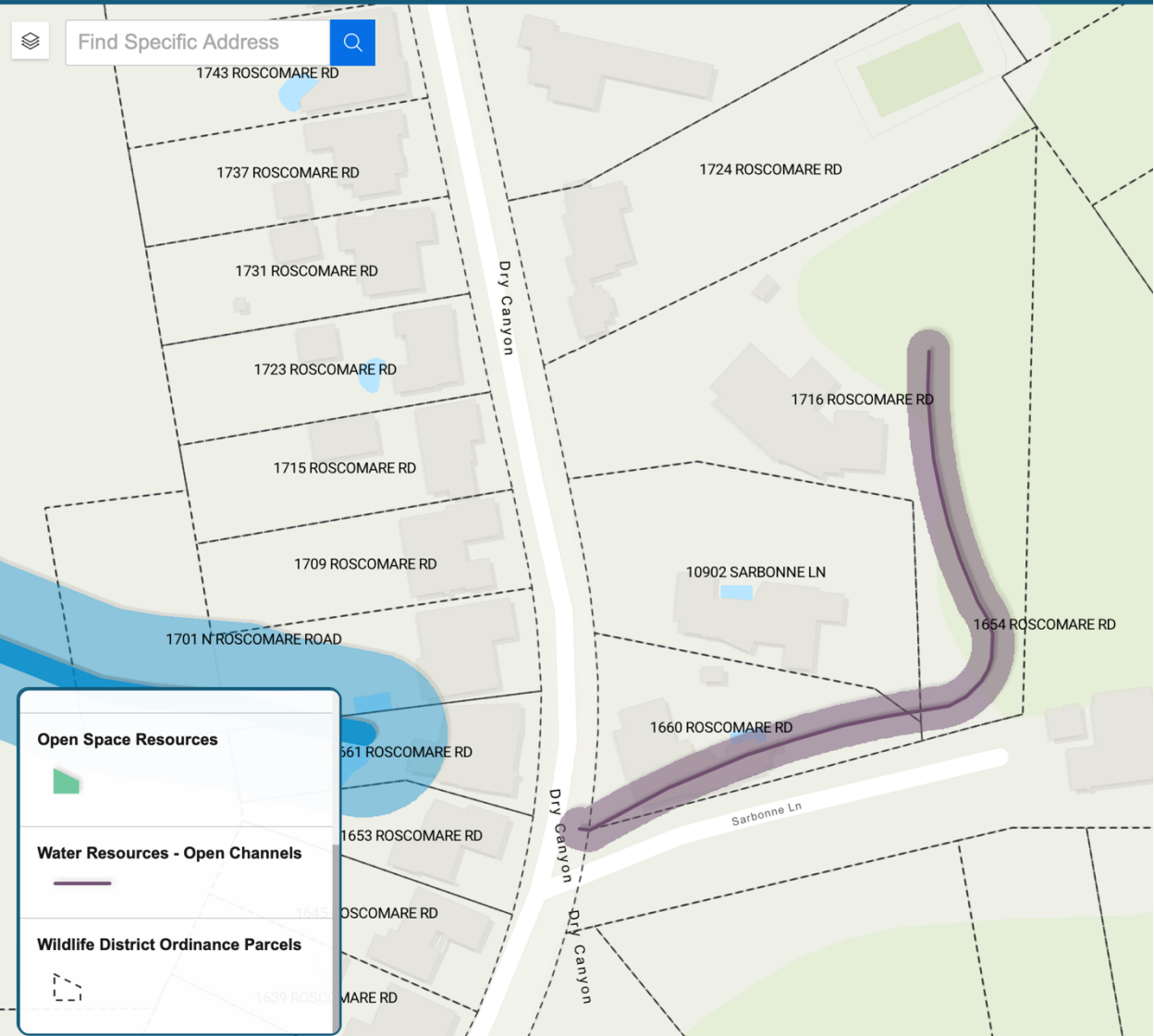
Exhibit 1

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 14<sup>th</sup>, 2022





## Communication from Public

**Name:** Ignacio Rodriguez

**Date Submitted:** 06/19/2023 11:30 PM

**Council File No:** 14-0518

**Comments for Public Posting:** 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. 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. 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 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 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.. 6 I OPPOSE the requirement in Section 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. 7 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. 8 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. 9 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. 10 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.

June 19<sup>th</sup>, 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,

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



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Most homes in these neighborhoods 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.

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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.

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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,

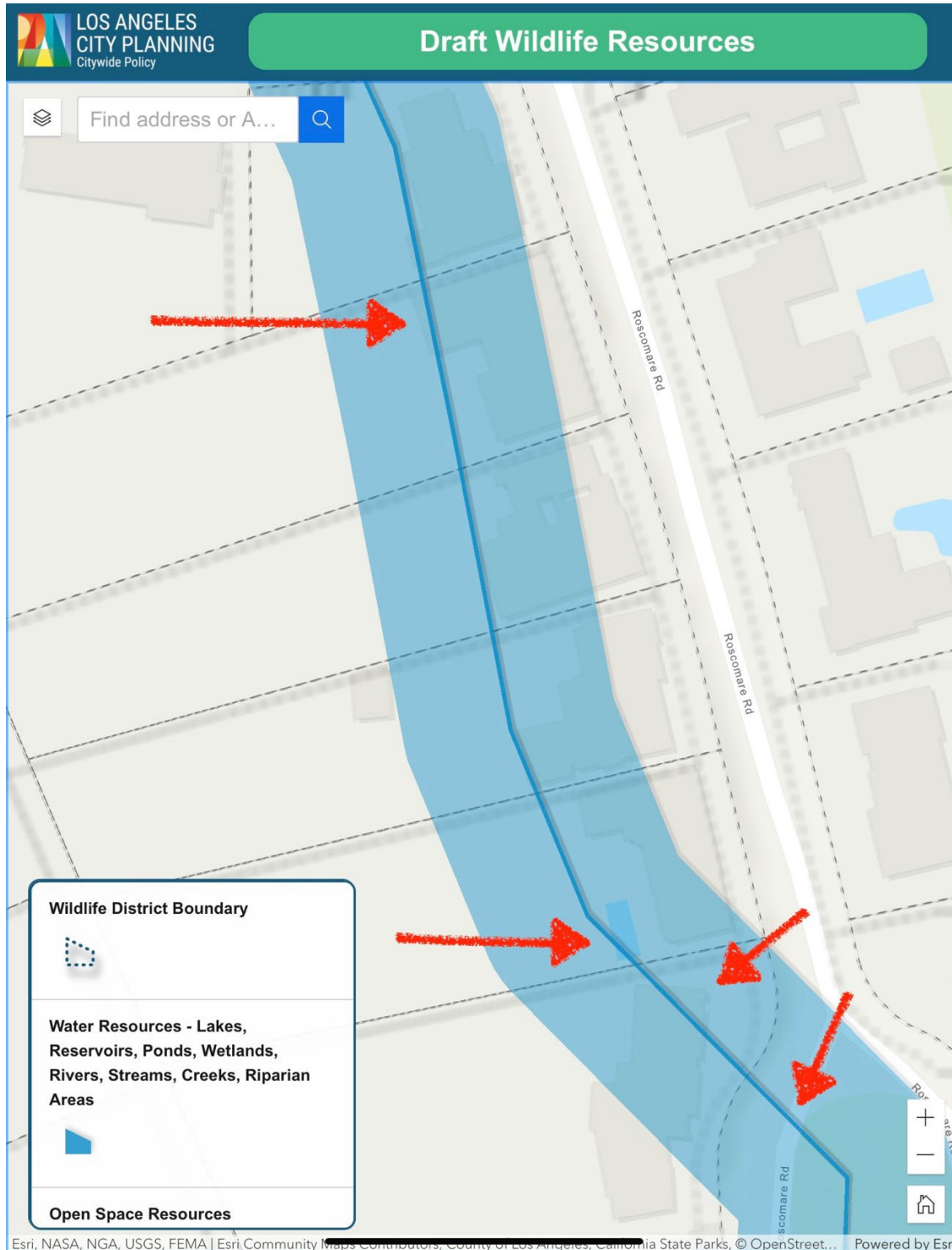
Ignacio Rodriguez  
Architect

Exhibit 1

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

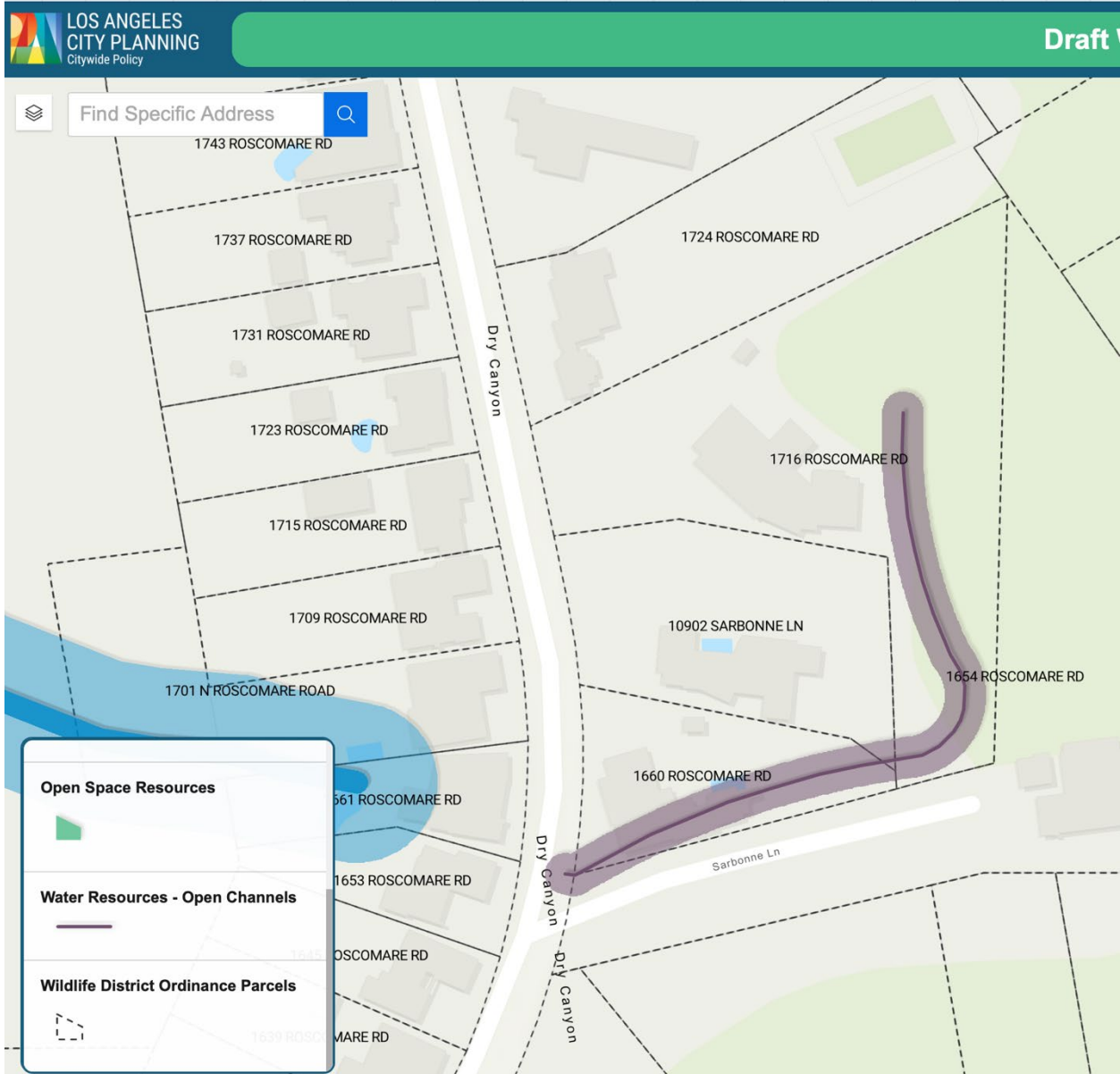
The Wildlife Resource so depicted does not exist.

Source: Current Planning Department Wildlife Resource Map, captured on November 14<sup>th</sup>, 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 19<sup>th</sup>, 2023



## Communication from Public

**Name:** Jeffrey Schuller

**Date Submitted:** 06/19/2023 11:48 PM

**Council File No:** 14-0518

**Comments for Public Posting:** I OPPOSE the regulation because it conflicts with State laws (e.g. for ADUs, and lot split per SB9) to increase housing. There must be an exception made to accommodate the State laws especially to prevent anticipated litigation to strike the regulation. Additionally, there is no evidence and broad based scientific evidence and data that the proposed regulation will have the desired impact let alone compared to the significant harm to property owners' rights and safety. This reeks of a backhanded activist regulation motivated by special interest to prevent development. A subset of citizens and landowners are unfairly and unjustly paying the price for the government's taking of property under cover of an alleged and baseless environmental need. The regulation should not pass. Most important, the entire process has been without due notice so that the public and affected parties can have an opportunity to be heard, object and process the impact such a measure will have on their rights and life.

June 19<sup>th</sup>, 2023

Via Email and Messenger

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

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Dear Honorable Members and Los Angeles City Planning Staff,

1. **I OPPOSE** the regulation because it conflicts with State laws (e.g. for ADUs, and lot split per SB9) to increase housing. There must be an exception made to accommodate the State laws especially to prevent anticipated litigation to strike the regulation.

In addition, I agree and reiterate all the points made in the below letter I received opposing the regulation.

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.



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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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..

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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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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.

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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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.

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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.

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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, Jeffrey Schuller

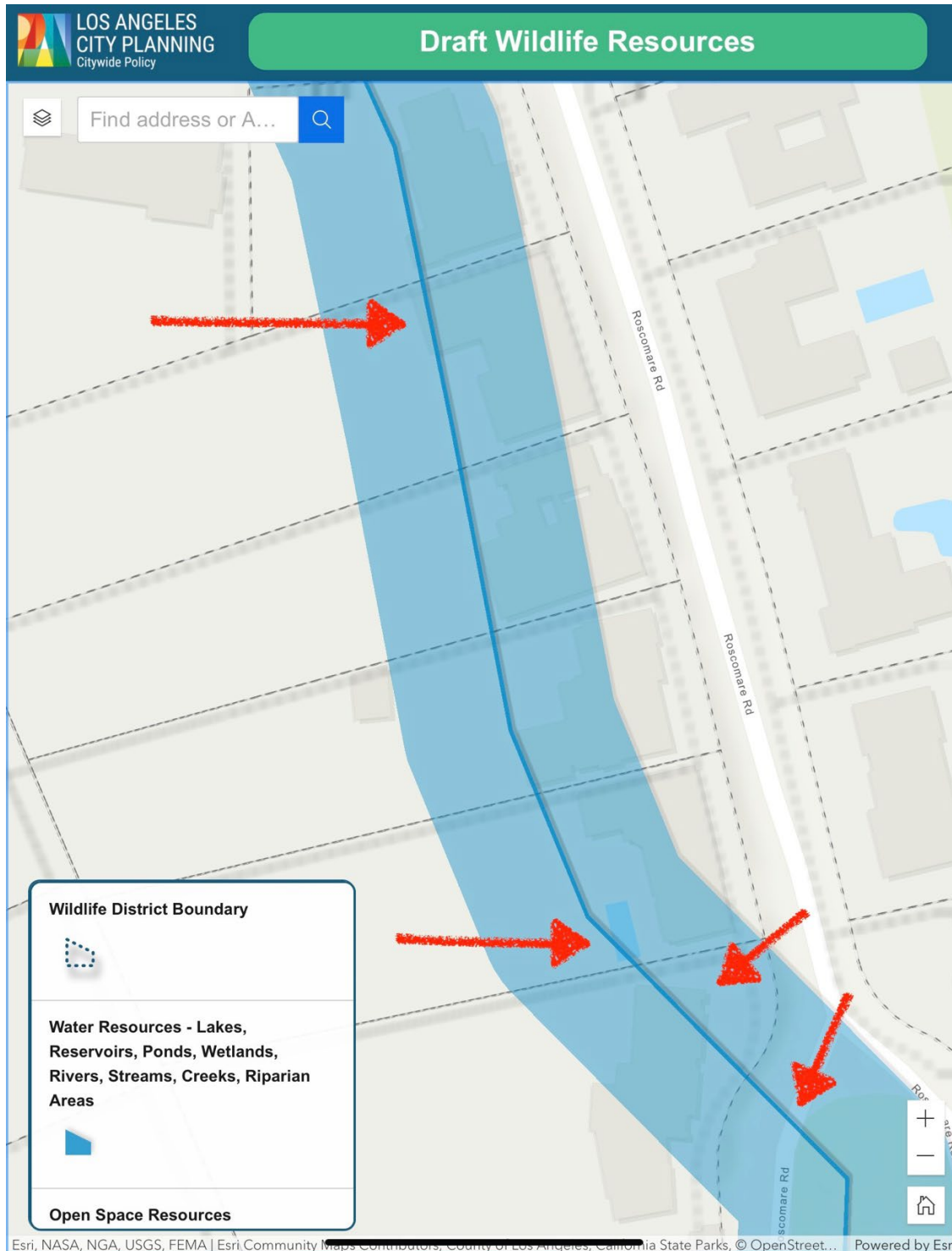
## Homeowner

### Exhibit 1

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The Wildlife Resource so depicted does not exist.

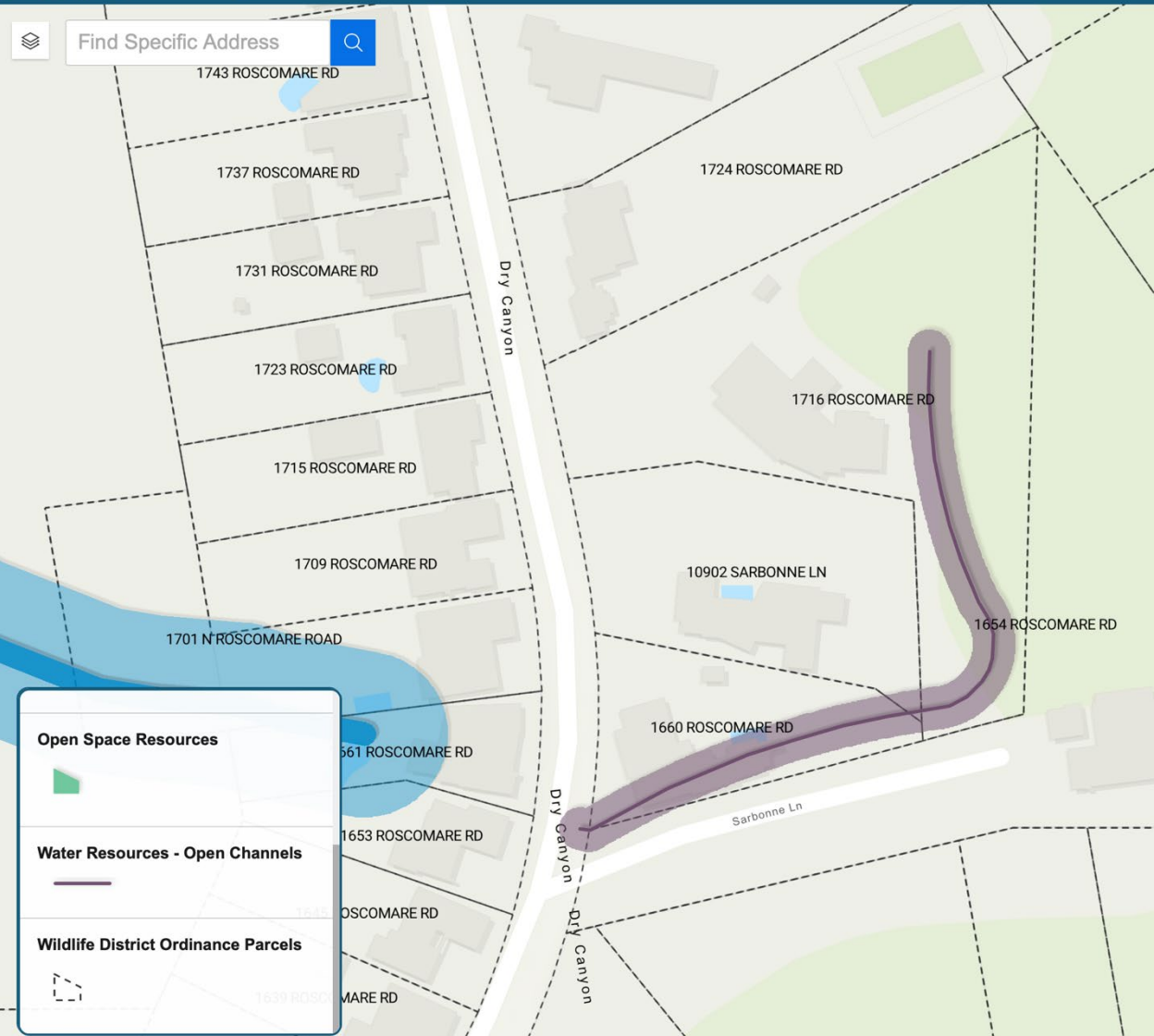
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Source: Current Planning Department Wildlife Resource Map, captured on June 19<sup>th</sup>, 2023



## Communication from Public

**Name:** Robin H

**Date Submitted:** 06/20/2023 01:40 AM

**Council File No:** 14-0518

**Comments for Public Posting:** ) 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 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



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June 19<sup>th</sup>, 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 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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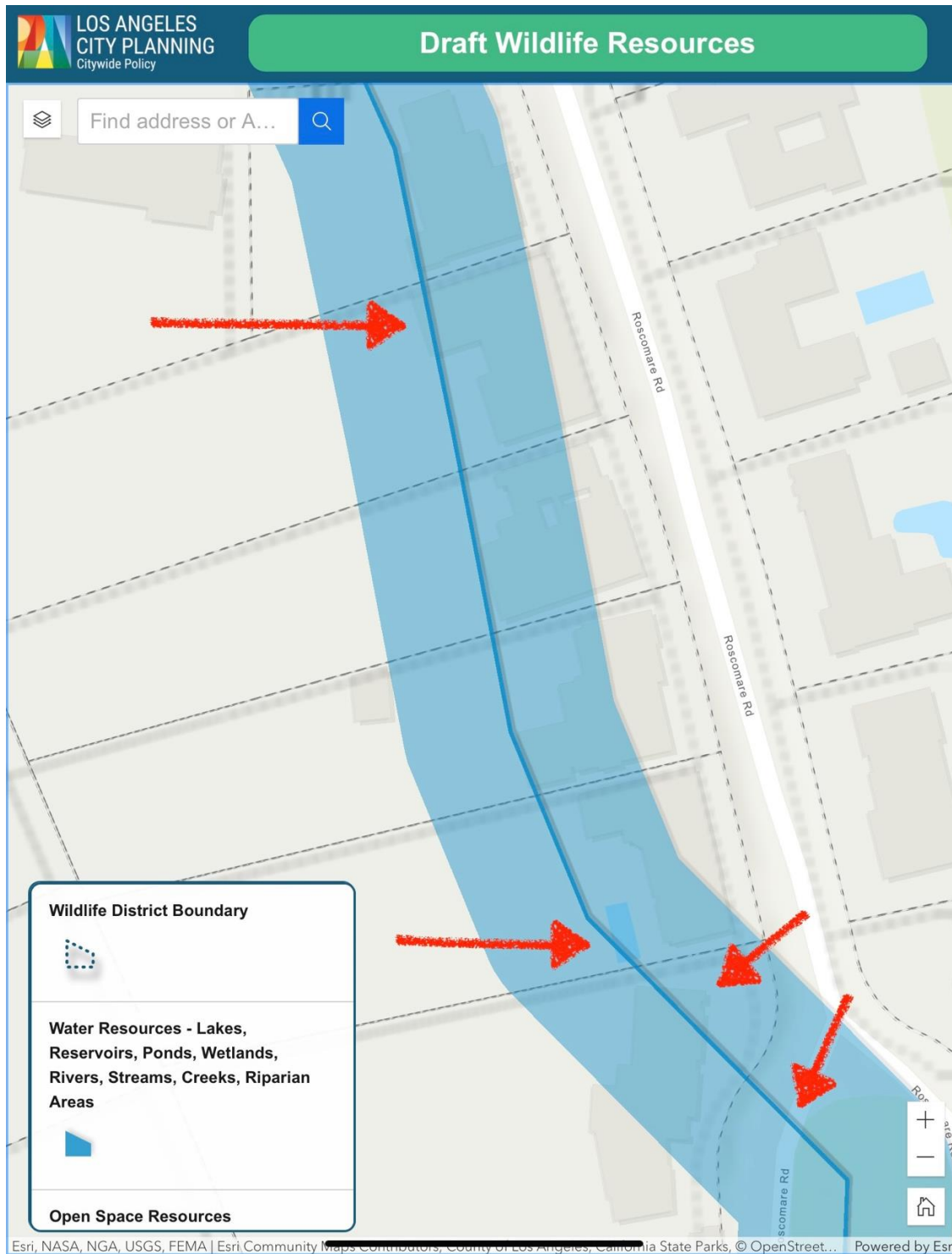
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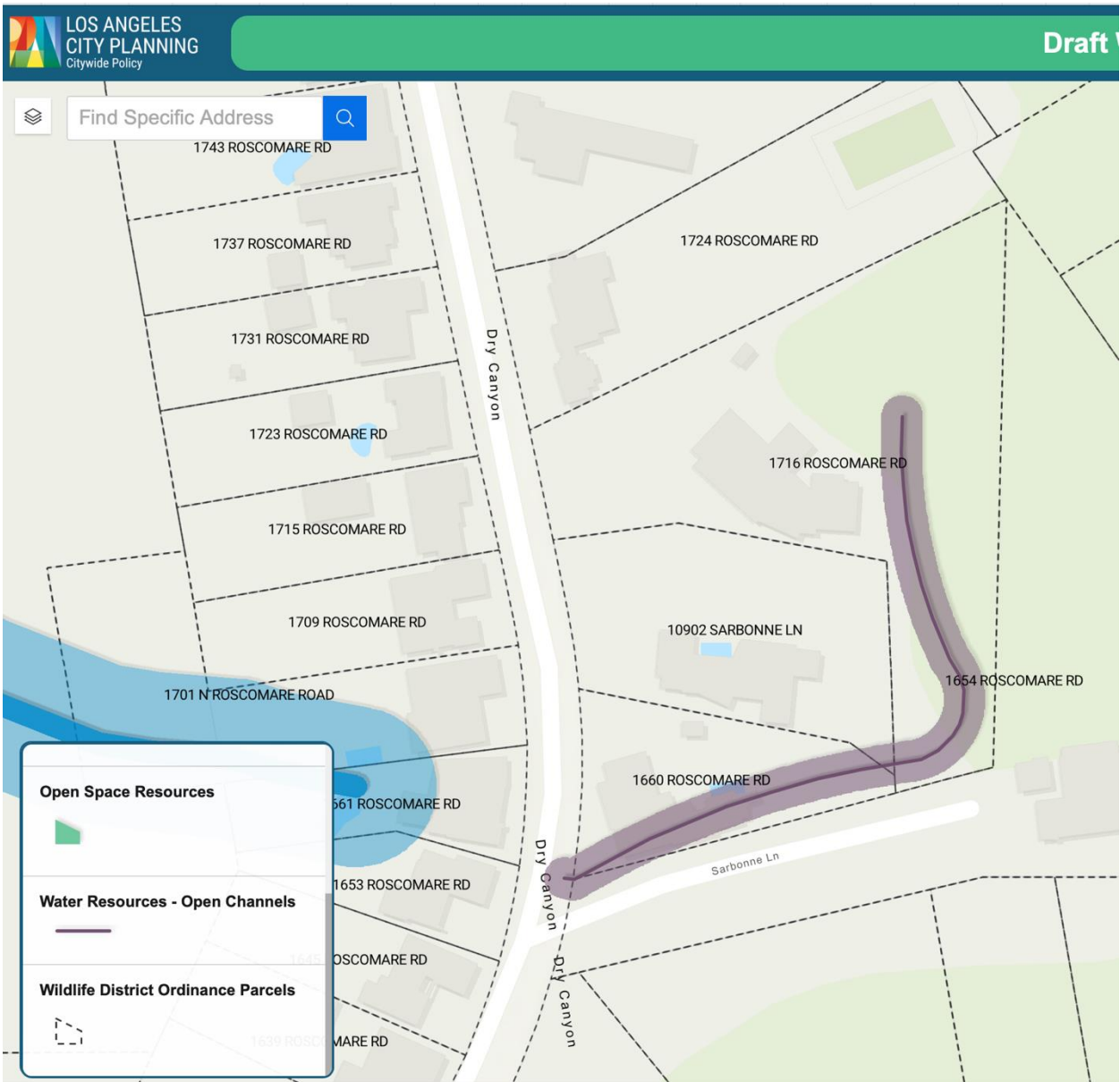
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Source: Current Planning Department Wildlife Resource Map, captured on November 14<sup>th</sup>, 2022



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## Communication from Public

**Name:** Staness Jonekos

**Date Submitted:** 06/20/2023 06:34 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 Council members 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 Council members 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

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June 19<sup>th</sup>, 2023

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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 drip line of a Significant (aka large) tree.

Where the drip line 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..

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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 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.

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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

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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** Council members 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 Council members 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,*

*Staness Jonekos & Michael Becker*

*Homeowner*

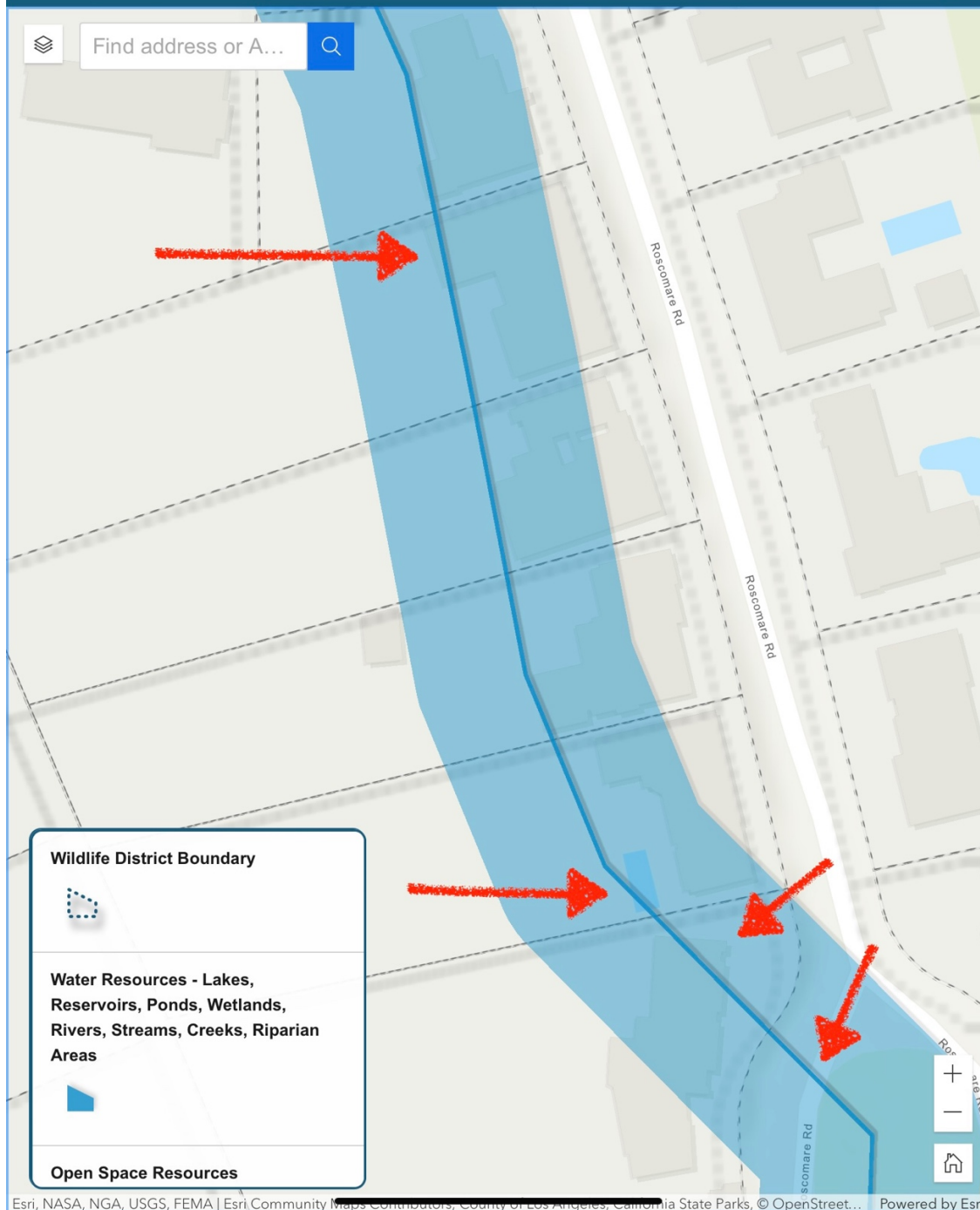
Exhibit 1

Example of Erroneous Wildlife Resource in Bel Air Hills,  
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The Wildlife Resource so depicted does not exist.

Source: Current Planning Department Wildlife Resource Map, captured on November 14<sup>th</sup>, 2022

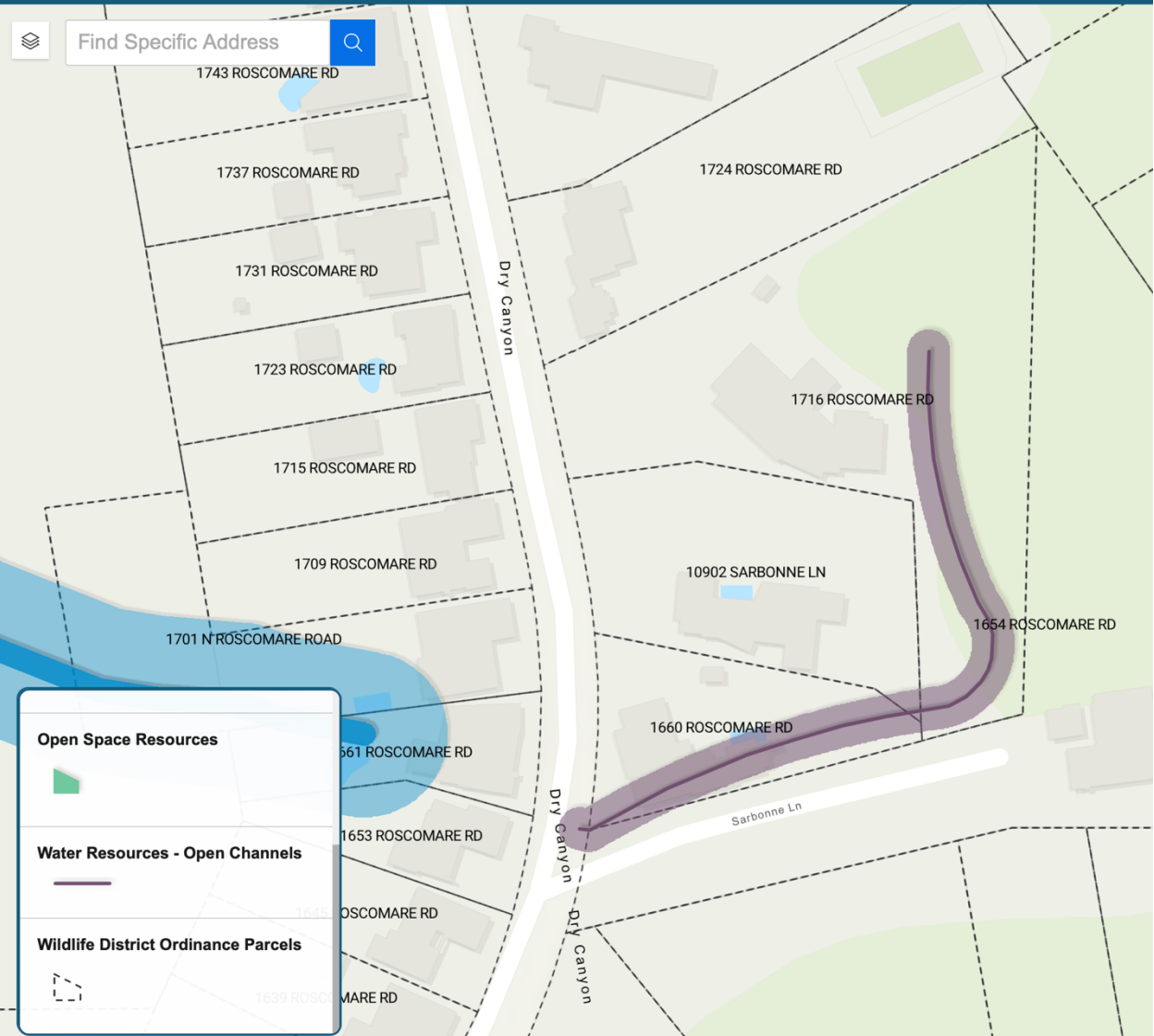




Esri, NASA, NGA, USGS, FEMA | Esri Community Maps Contributors, County of Los Angeles, California State Parks, © OpenStreet... Powered by Esri

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 19<sup>th</sup>, 2023



## **Communication from Public**

**Name:** Californians for Homeownership  
**Date Submitted:** 06/20/2023 12:15 PM  
**Council File No:** 14-0518  
**Comments for Public Posting:** Please see the attached correspondence.



June 20, 2023

**VIA EMAIL**

Planning and Land Use Management Committee  
City Council, City of Los Angeles  
200 North Spring Street  
Los Angeles, CA 90012  
Email: [clerk.plumcommittee@lacity.org](mailto:clerk.plumcommittee@lacity.org)

RE: June 20, 2023 PLUM Committee Meeting, Agenda Item 19  
*Wildlife Ordinance (Council File No. 14-0518)*

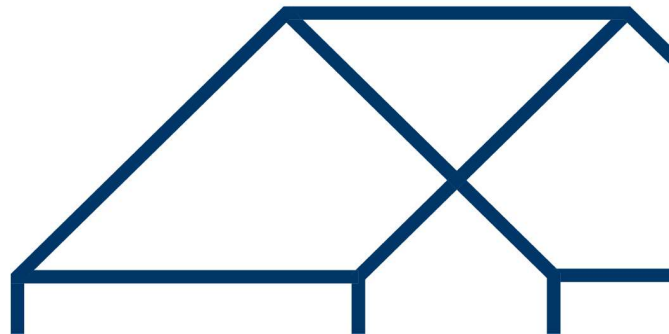
To the Members of the Planning and Land Use Management Committee:

Californians for Homeownership is a 501(c)(3) organization devoted to using impact litigation to address California's housing crisis. We are writing as part of our work to enforce SB 330, the Housing Crisis Act of 2019.

The Act generally prohibits downzonings or other zoning changes that include "reductions to height, density, or floor area ratio, new or increased open space or lot size requirements, or new or increased setback requirements, minimum frontage requirements, or maximum lot coverage limitations, or anything that would lessen the intensity of housing," with a limited exception for changes that do not create a net loss in residential capacity. Gov. Code § 66300(b)(1)(A). The staff report being presented to you appears to openly concede that the ordinance constitutes a downzoning, but suggests that the City can invoke this no-net-loss exception:

[W]hile the proposed Wildlife Ordinance does not include upzones to parcels elsewhere in the city, the City is in the process of increasing zoning allowances in various locations throughout the city, particularly in proximity to transit infrastructure, through its update to Community Plans, as well as the Regional Housing Needs Assessment/Housing Element implementation program, thereby assuring no net loss of zoned housing capacity or intensity across the city.

That is not how the law works. In order to qualify for the no-net-loss exception, the increase in residential capacity must happen "concurrently," meaning "at the same meeting of the legislative body." Gov. Code § 66300(h)(2).



June 20, 2023

Page 2

If the City moves forward with the ordinance as drafted, litigation is certain to result.

Sincerely,



Matthew Gelfand

cc: Vincent P. Bertoni, AICP, Director of Planning (by email to vince.bertoni@lacity.org)  
Nicholas P. Maricich, Principal City Planner (by email to nicholas.maricich@lacity.org)  
Conni Pallini-Tipton, AICP, Snr. City Planner (by email to conni.pallini-tipton@lacity.org)  
Katherine Superfisky, Urban Ecologist (by email to kat.superfisky@lacity.org)  
Patrick Whalen, City Planner (by email to patrick.whalen@lacity.org)

## Communication from Public

**Name:** Saul R. Smith

**Date Submitted:** 06/20/2023 12:20 PM

**Council File No:** 14-0518

**Comments for Public Posting:** June 19th, 2023 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.

June 19<sup>th</sup>, 2023

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.

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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).

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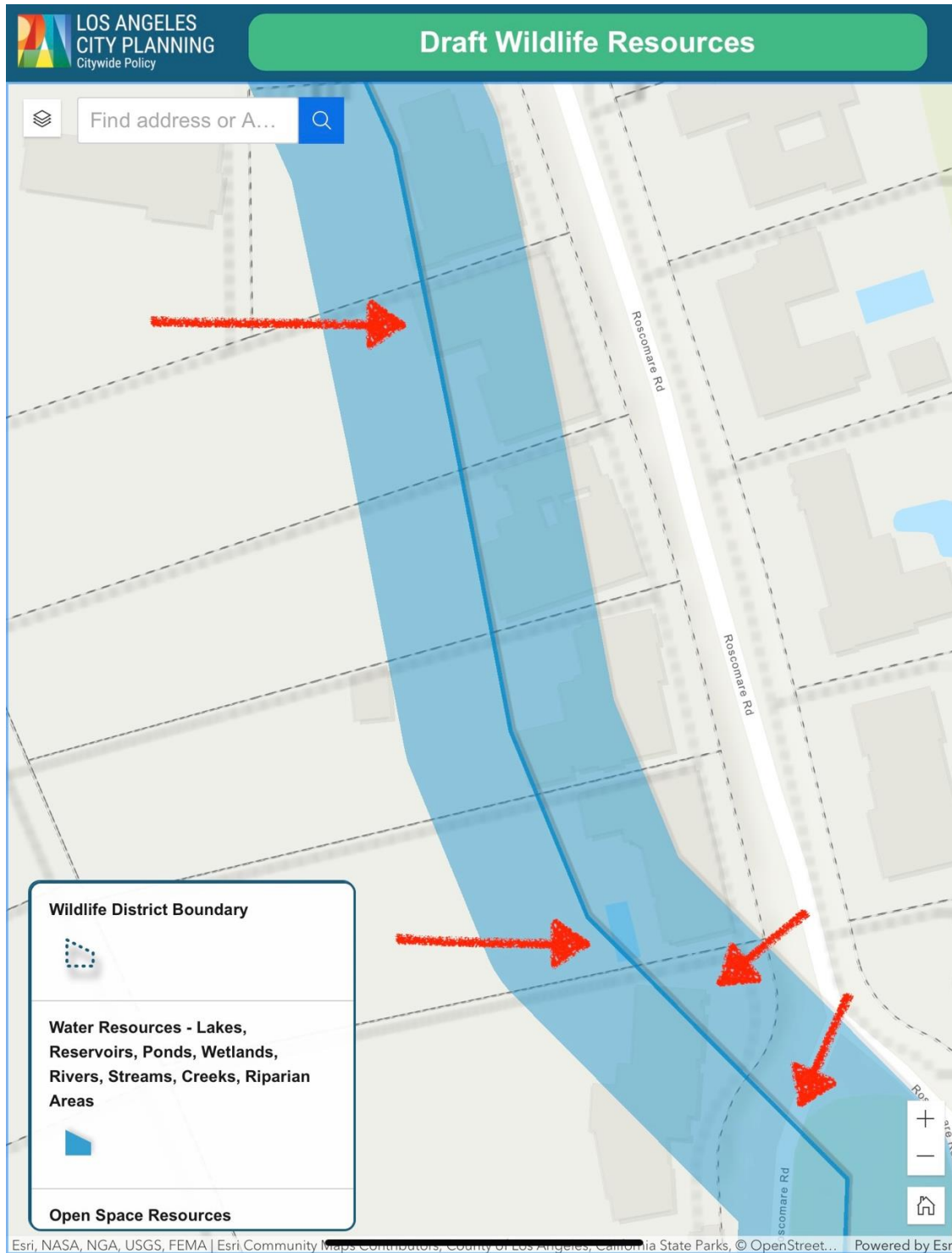
Homeowner

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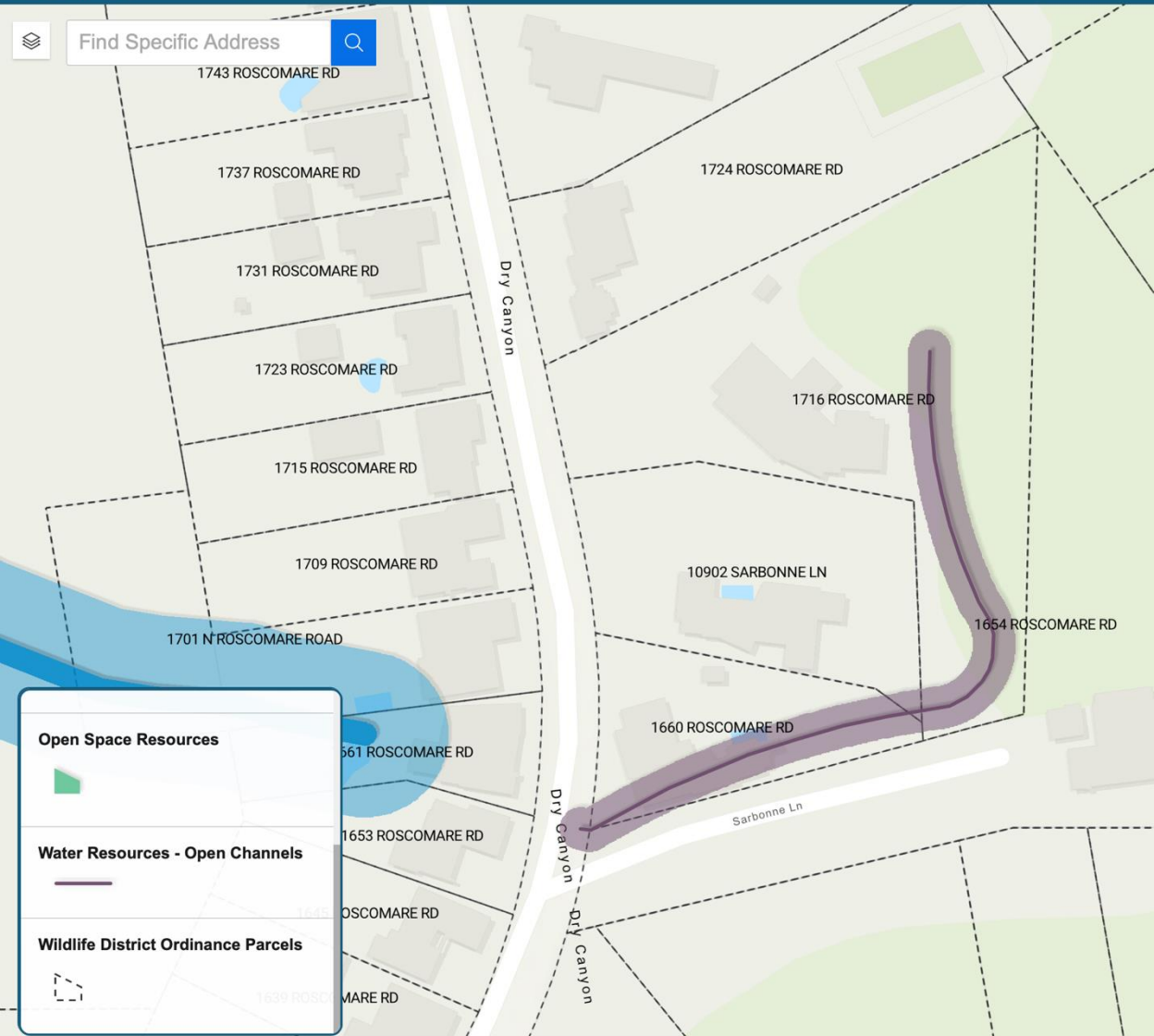
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## Communication from Public

**Name:**

**Date Submitted:** 06/20/2023 12:32 PM

**Council File No:** 14-0518

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June 20<sup>th</sup>, 2023

Via Email and Messenger

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

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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.

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.

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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.

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.

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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.

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.

Sincerely,  
S. Mak

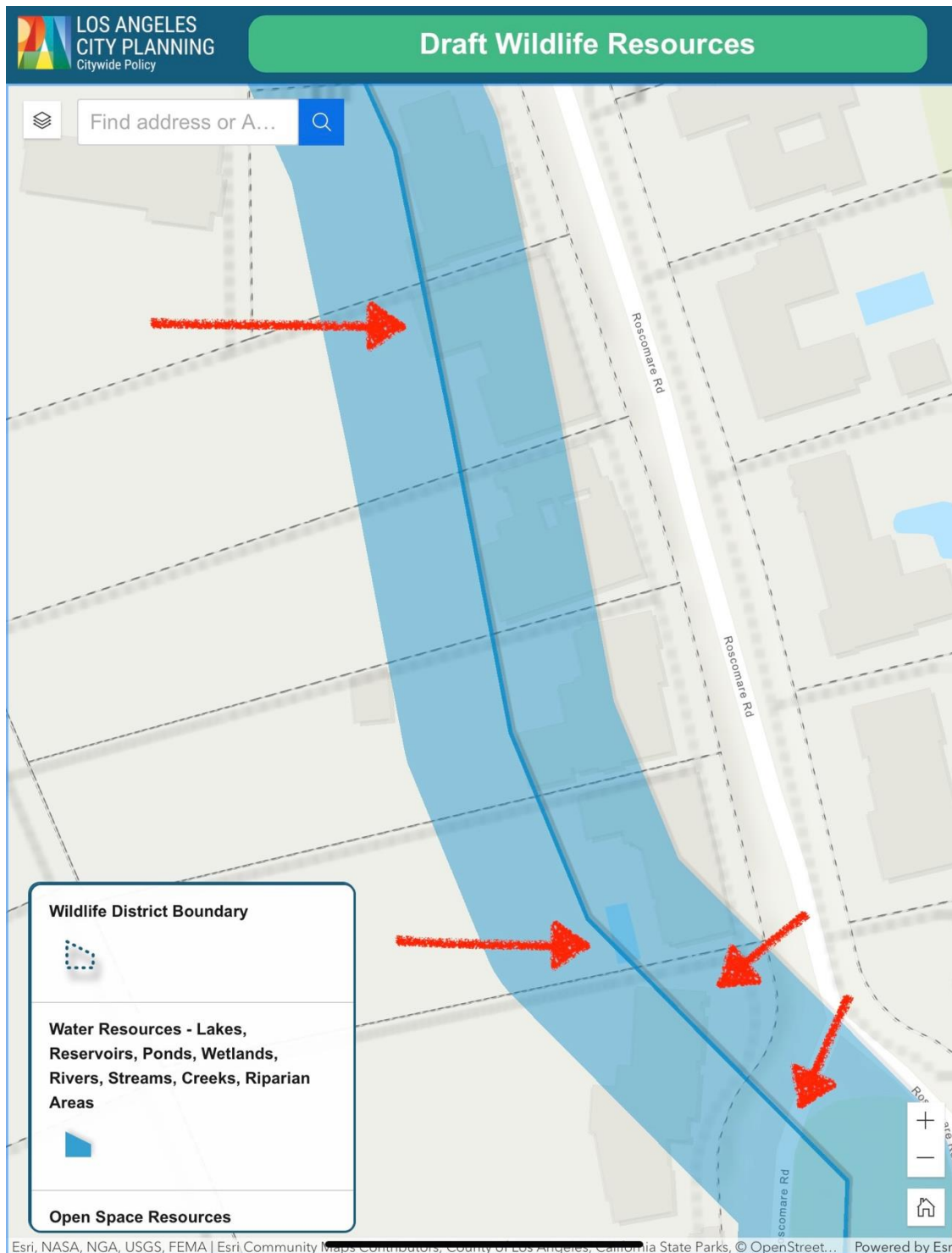
|

### 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.

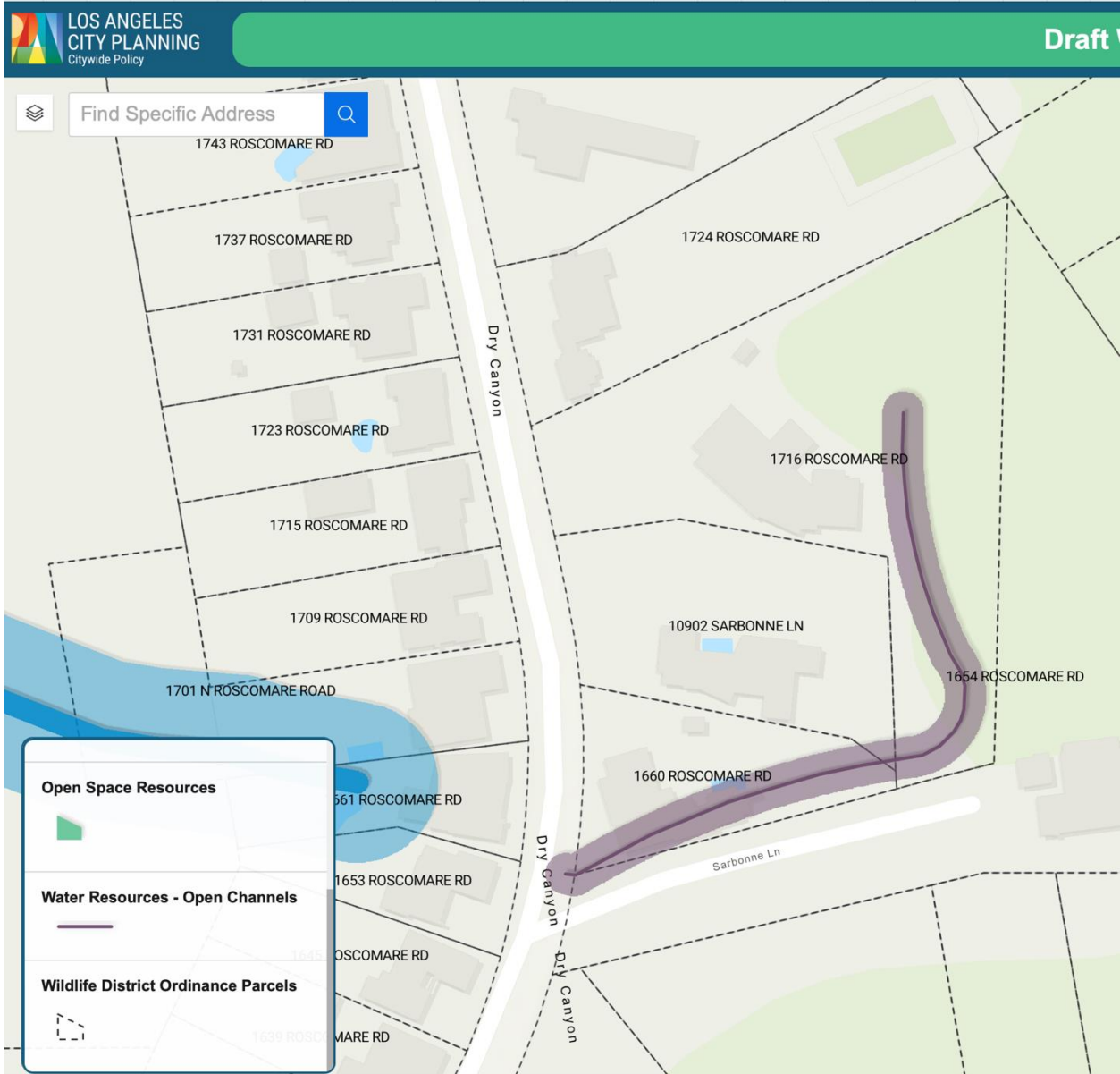
Source: Current Planning Department Wildlife Resource Map, captured on November 14<sup>th</sup>, 2022



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 19<sup>th</sup>, 2023



## Communication from Public

**Name:** Cynthia Grant

**Date Submitted:** 06/20/2023 01:12 PM

**Council File No:** 14-0518

**Comments for Public Posting:** I am reaching out to ask that you reconsider the implementation of this ordinance. We are all for saving the wildlife but not for reducing our property values. This is not good for the city!



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.

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2 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 nonnative 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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4 OPPOSE the requirement in Section Section F.1(j) that requires trash cans to be stored in a building or special enclosure.

According to the Los Angeles Municipal Code (LAM) 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.

5 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.

6 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 difficulty of a Site Plan Review and Biological Assessment. See Exhibit 1 for examples.

7 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

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

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

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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

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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,

Cynthia Grant

1650 Bel Air Rd.

Los Angeles, CA 90077

## **Communication from Public**

**Name:** Steve Mankowski  
**Date Submitted:** 06/20/2023 01:35 PM  
**Council File No:** 14-0518  
**Comments for Public Posting:** See attached document.

June 20<sup>th</sup>, 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 do work within the proposed Wildlife Supplemental Use District ("WLD"), fully developed and well-established neighborhoods, 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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Sincerely,

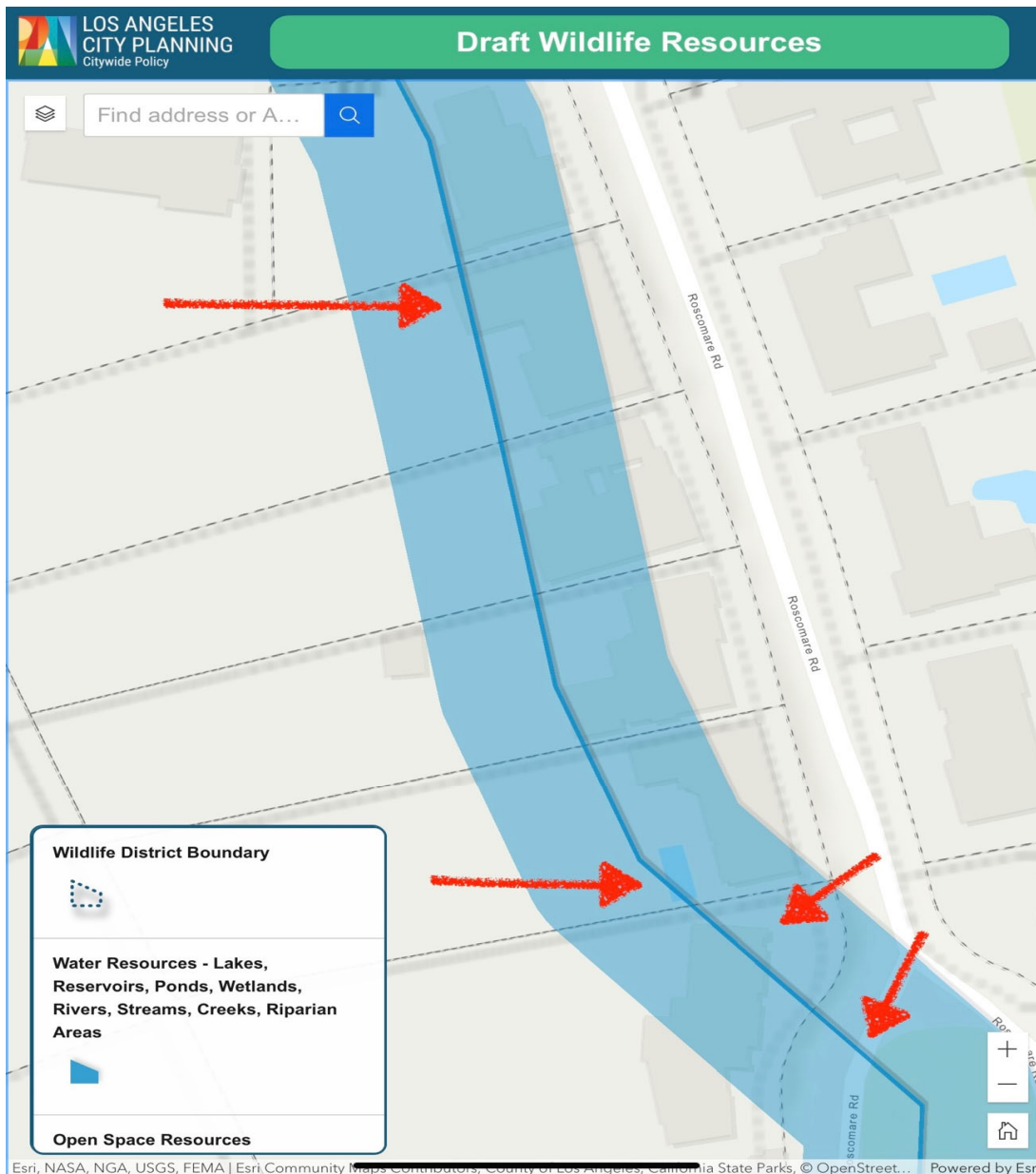
A handwritten signature in black ink, appearing to read "Stan Muli", is written over a blue horizontal line. The signature is stylized and cursive.

Exhibit 1

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

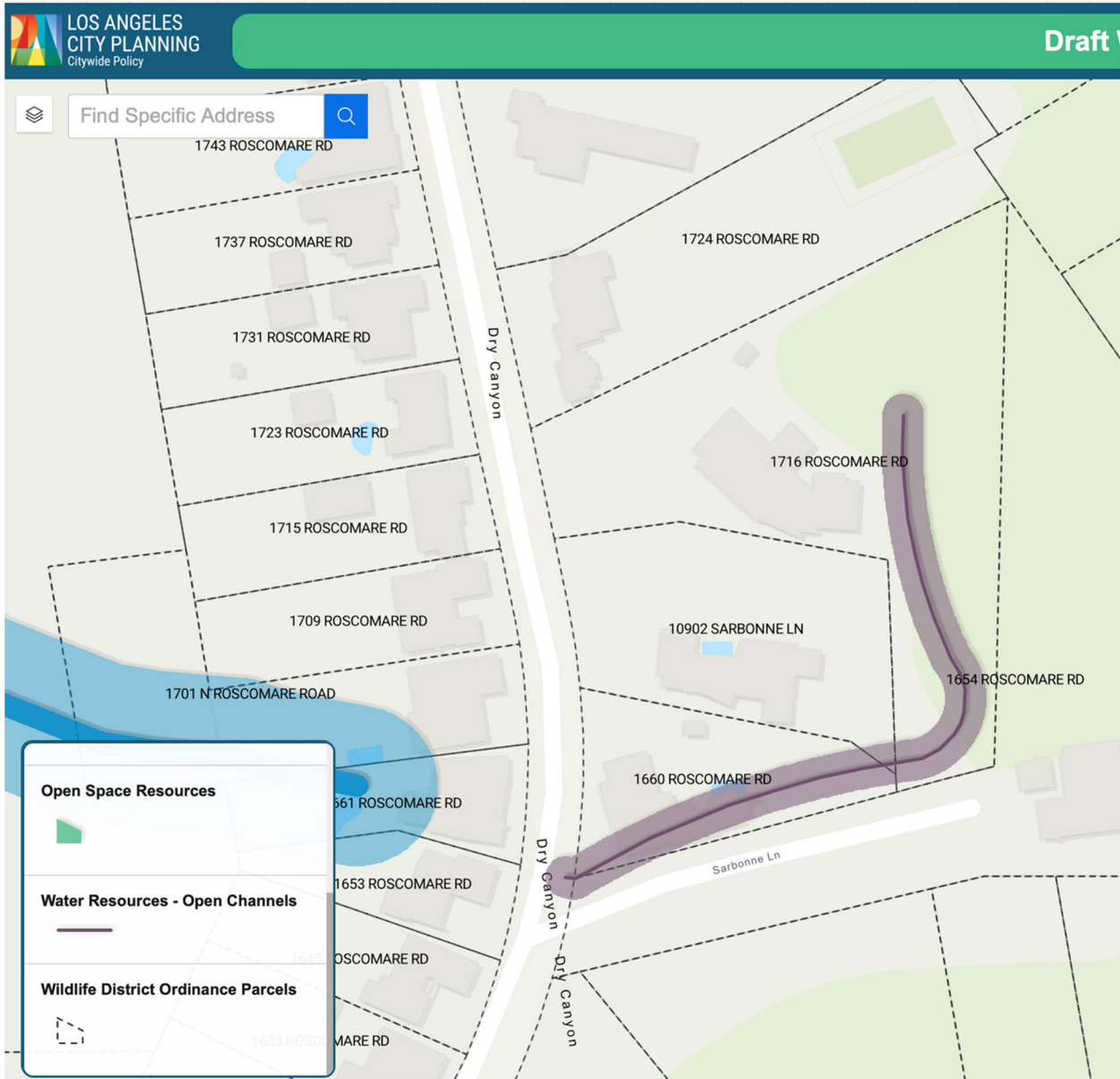
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Source: Current Planning Department Wildlife Resource Map, captured on November 14<sup>th</sup>, 2022



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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 19<sup>th</sup>, 2023



## **Communication from Public**

**Name:** Carl King  
**Date Submitted:** 06/20/2023 08:42 PM  
**Council File No:** 14-0518  
**Comments for Public Posting:** Please see the attached letter.

Carl King, PhD  
8574 Cole Crest Dr.  
Los Angeles, CA 90046  
(818) 501-5375  
psychking@aol.com

June 20, 2023

Via Email

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

Dear Honorablers 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.

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.

Carl King

5.

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,



Carl King, PhD

## Communication from Public

**Name:** Andrew P Harwood

**Date Submitted:** 06/20/2023 07:56 AM

**Council File No:** 14-0518

**Comments for Public Posting:** Please see the attached letter in a "pdf" file requesting a delay in discussing the Wildlife Ordinance CF 14-0518 from the PLUM Committee agenda for June 20th.

1072 Casiano Road  
Los Angeles, California 90049-1610  
June 20, 2023

Via Email

Dear Honorable Members and Los Angeles City Planning Staff;

**PROPOSED DRAFT WILDLIFE ORDINANCE (CF 14-0518)**

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. My particular home was built around 1967 and I have lived in it since 1987.

As you may detect, below I have admittedly "plagiarized" a letter prepared by a neighbor who is much more knowledgeable than I on this Ordinance and has been following its progression through the legislative process. We have been kept abreast of the situation but quite surprised to see it has reached this step in the process. Hence, my attempt to request a deferral of this topic from the June 20<sup>th</sup> meeting agenda. The more formal rationale for the delay follows.

Should you wish further background on my residence or me, please feel free to contact me at the above address or email at "[andrewharwood4@gmail.com](mailto:andrewharwood4@gmail.com)".

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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.

## **Communication from Public**

**Name:** Israel Baron  
**Date Submitted:** 06/20/2023 07:58 AM  
**Council File No:** 14-0518  
**Comments for Public Posting:** See attachment

June 19<sup>th</sup>, 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 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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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.

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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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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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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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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.

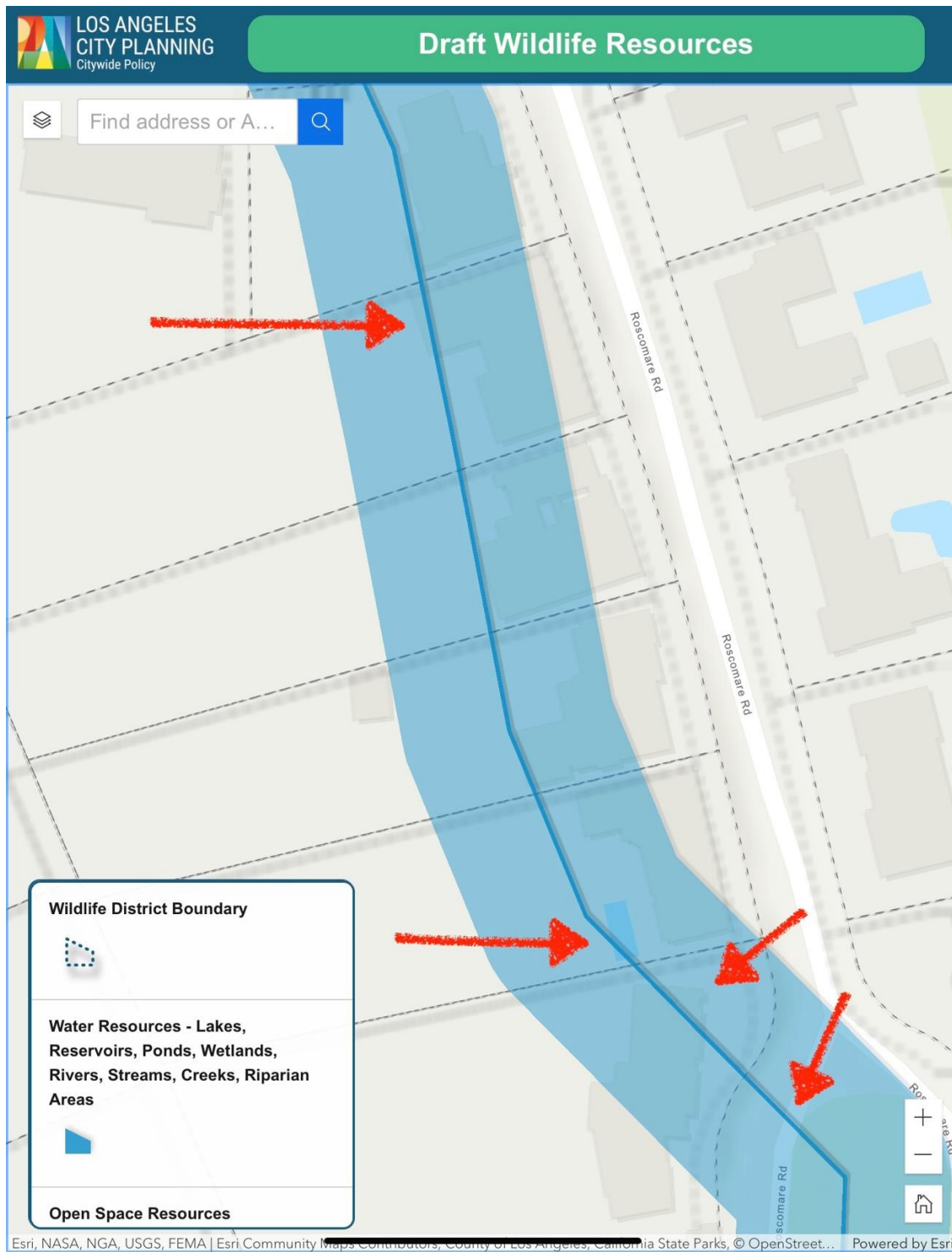
Sincerely,  
Israel Baron  
Homeowner

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.

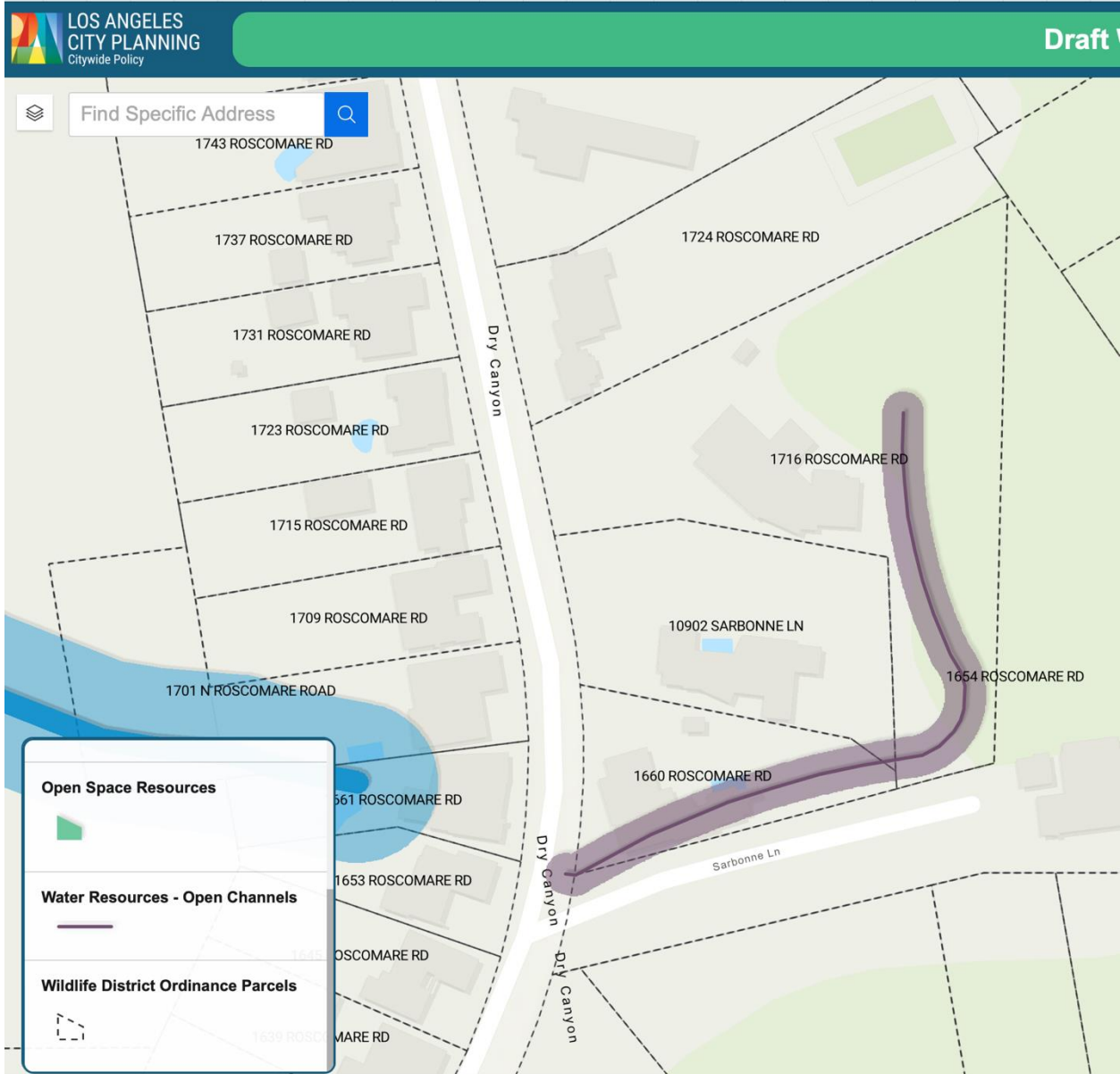
Source: Current Planning Department Wildlife Resource Map, captured on November 14<sup>th</sup>, 2022



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 19<sup>th</sup>, 2023



## Communication from Public

**Name:** Shannon Millard

**Date Submitted:** 06/20/2023 08:48 AM

**Council File No:** 14-0518

**Comments for Public Posting:** June 20th, 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 1960’s 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. Additionally, this should be voted on by the communities that will be impacted, not just the City Council. 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 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 20<sup>th</sup>, 2023

Via Email and Messenger

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

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 trashcan enclosures would be considered structures and thus prohibited inside 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 trashcans 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 trashcans 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 difficulty 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.

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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.**

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 taking property away from the residents of the community.

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,

*Shannon Millard*

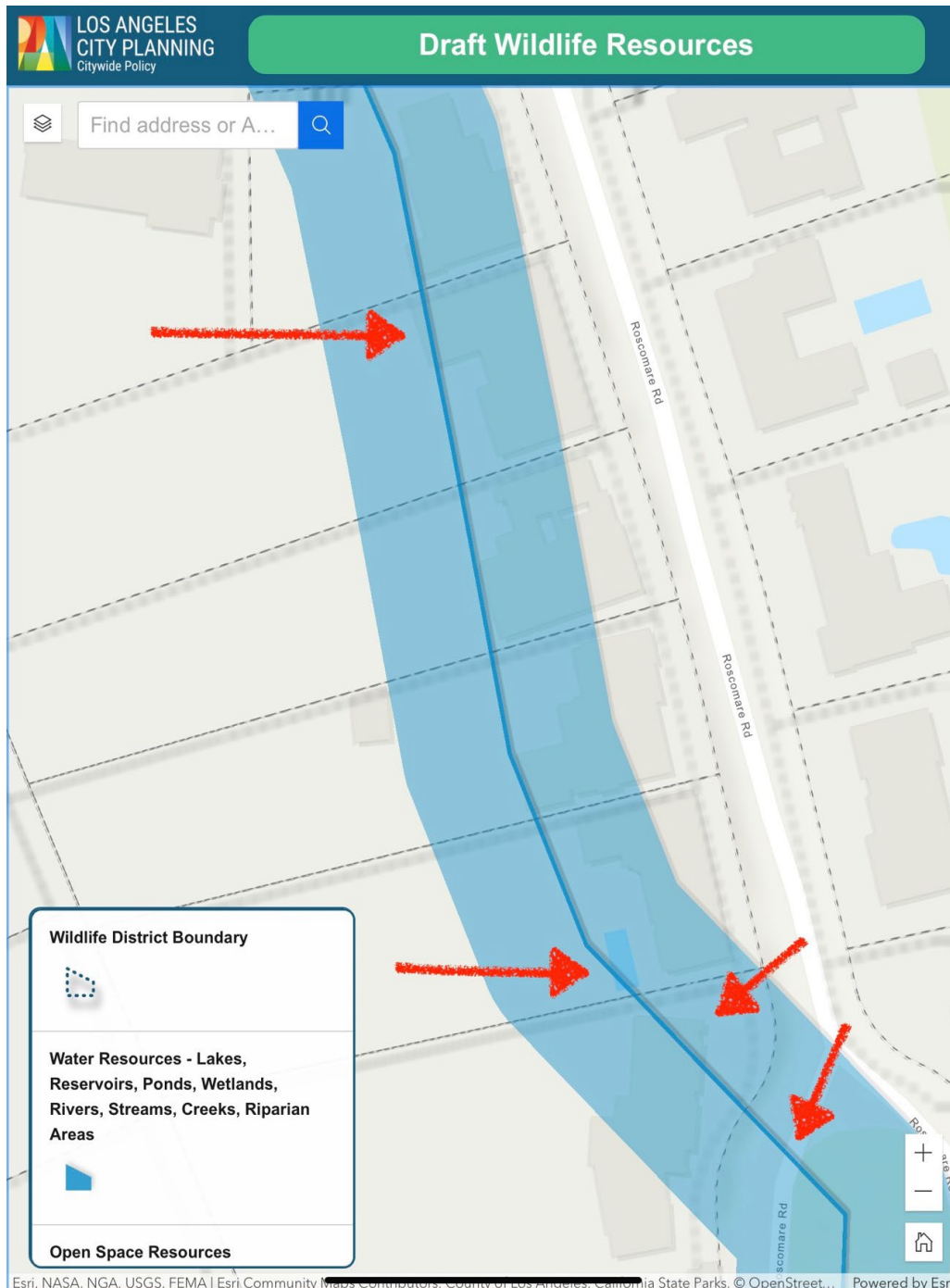
Shannon Millard  
Homeowner  
2121 N Beverly Drive

### Exhibit 1

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

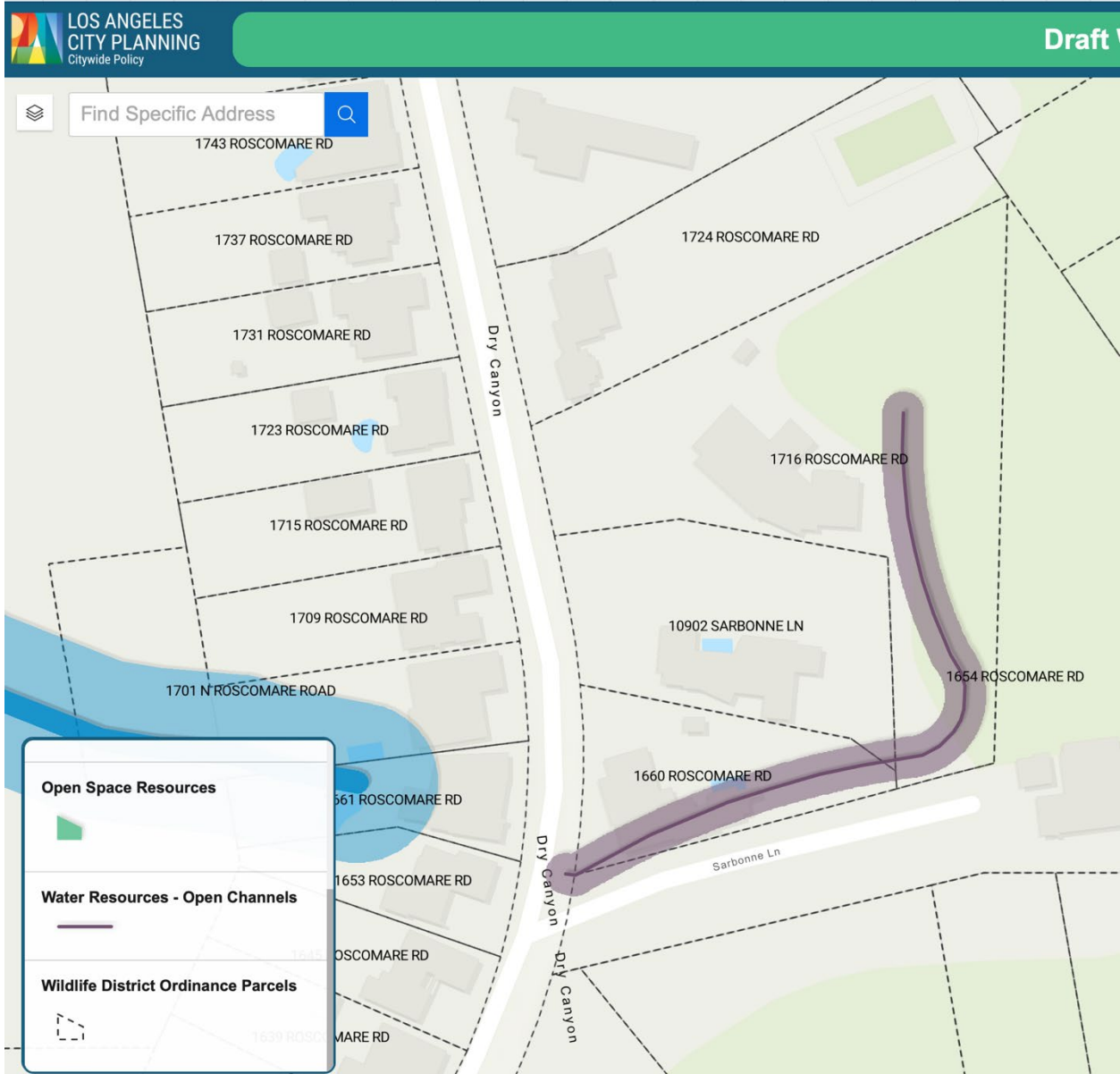
The Wildlife Resource so depicted does not exist.

Source: Current Planning Department Wildlife Resource Map, captured on November 14<sup>th</sup>, 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.

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## Communication from Public

**Name:** ofer resles  
**Date Submitted:** 06/20/2023 09:02 AM  
**Council File No:** 14-0518  
**Comments for Public Posting:** Letter is attached

June 19<sup>th</sup>, 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 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.

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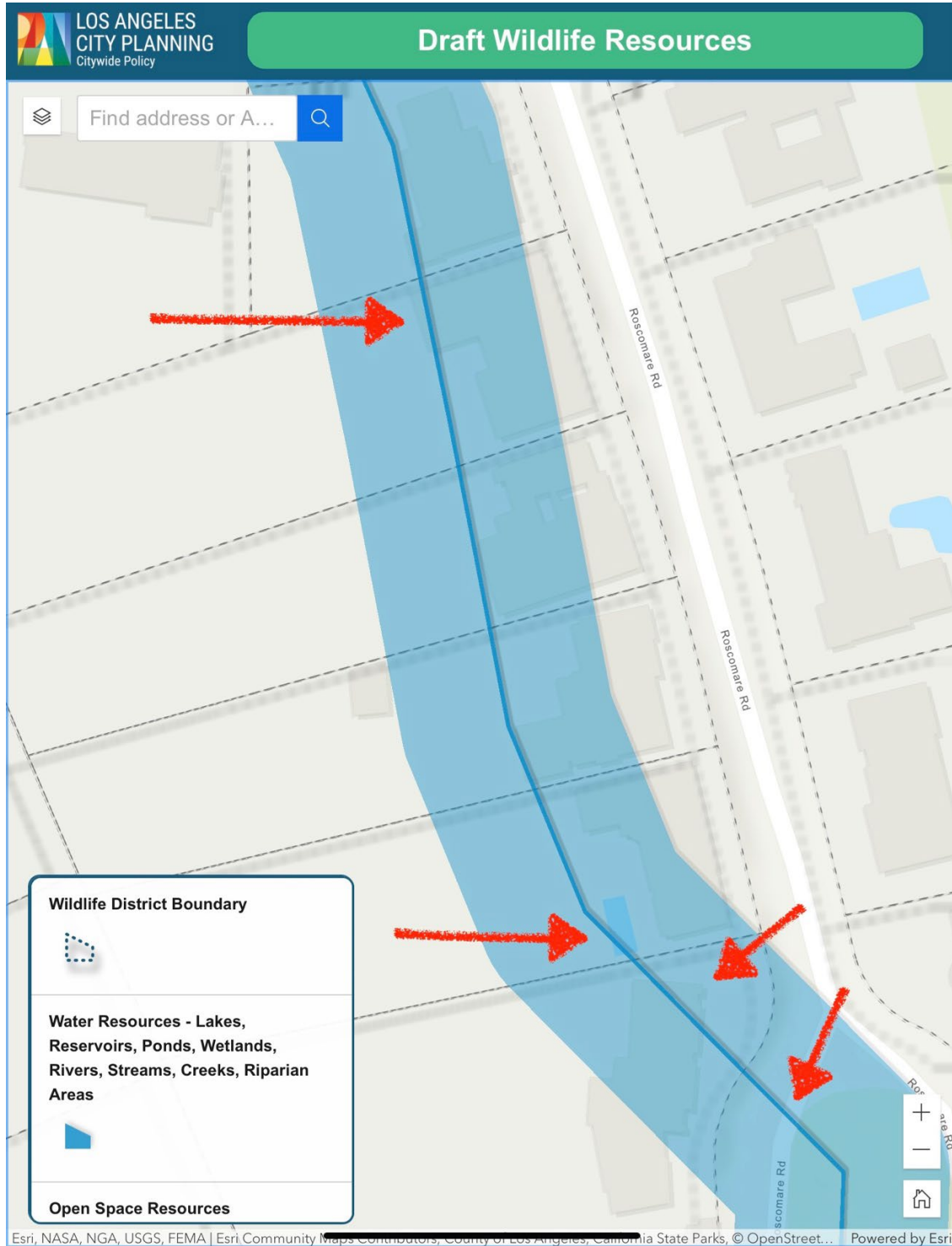
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Sincerely,

Ofer Resles - Homeowner

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