

Communication from Public

Name: Valley Industry & Commerce Association

Date Submitted: 11/14/2024 09:49 AM

Council File No: 14-0518

Comments for Public Posting: Re: C.F. 14-0518: Wildlife Corridor/Santa Monica Mountains Zone Change - OPPOSE Dear Planning & Land Use Management Committee, The Valley Industry and Commerce Association (VICA) writes to express our opposition to the proposed Wildlife Ordinance Draft Report, which we believe will impose undue burdens on property owners, developers, and local businesses while failing to adequately balance wildlife protection with the housing and economic needs of Los Angeles. The proposed ordinance extends new, restrictive regulations to broad areas under the guise of preserving wildlife corridors, yet it lacks concrete evidence to justify these constraints. Simply designating large areas as “Wildlife Districts” fails to account for the complex nature of urban habitats. Applying a sweeping ordinance based on general assumptions about wildlife corridors does not offer meaningful protection and instead risks stalling housing development.

1. The Ordinance Unreasonably Restricts Property Rights Across a Wide Area By categorizing large swaths of land as Wildlife Districts without individual assessments, this ordinance could prevent property owners from making reasonable improvements or developing much-needed housing. The ordinance restricts land use based on generalized assumptions rather than specific environmental assessments of each parcel. Much like in Woodside, where generalized claims of habitat were used to restrict housing under SB 9, such broad restrictions without case-specific evidence fail to demonstrate a “real and substantial” relationship to conservation goals.

2. Disproportionate Impact on Housing and Economic Vitality Local restrictions that limit development must offer a net benefit to the community. This ordinance does not account for Los Angeles’s severe housing shortage, a crisis that requires new developments to meet demand. Restricting development under loosely defined wildlife protection measures will exacerbate housing shortages, likely driving up housing costs and increasing sprawl into sensitive areas. Such outcomes would harm, not enhance, both wildlife conservation and regional economic stability. VICA urges the City Council to reconsider this ordinance considering its broad and its potential negative implications for housing and property rights. Wildlife conservation should be pursued through targeted, data-driven measures that respect property rights and

align with Los Angeles's urgent housing needs. Stuart Waldman
VICA President



November 13, 2024

Planning & Land Use Management Committee
Los Angeles City Council
200 N. Spring Street
Los Angeles, CA 90012

Re: C.F. 14-0518: Wildlife Corridor/Santa Monica Mountains Zone Change - OPPOSE

Dear Planning & Land Use Management Committee,

The Valley Industry and Commerce Association (VICA) writes to express our opposition to the proposed Wildlife Ordinance Draft Report, which we believe will impose undue burdens on property owners, developers, and local businesses while failing to adequately balance wildlife protection with the housing and economic needs of Los Angeles.

The proposed ordinance extends new, restrictive regulations to broad areas under the guise of preserving wildlife corridors, yet it lacks concrete evidence to justify these constraints. Simply designating large areas as "Wildlife Districts" fails to account for the complex nature of urban habitats. Applying a sweeping ordinance based on general assumptions about wildlife corridors does not offer meaningful protection and instead risks stalling housing development.

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Local restrictions that limit development must offer a net benefit to the community. This ordinance does not account for Los Angeles's severe housing shortage, a crisis that requires new developments to meet demand. Restricting development under loosely defined wildlife protection measures will exacerbate housing shortages, likely driving up housing costs and increasing sprawl into sensitive areas. Such outcomes would harm, not enhance, both wildlife conservation and regional economic stability.

VICA urges the City Council to reconsider this ordinance considering its broad and its potential negative implications for housing and property rights. Wildlife conservation should be pursued through targeted, data-driven measures that respect property rights and align with Los Angeles's urgent housing needs.

A handwritten signature in black ink, appearing to read "Stuart Waldman", with a stylized flourish at the end.

Stuart Waldman
VICA President

Communication from Public

Name: John Bowman
Date Submitted: 11/14/2024 02:10 PM
Council File No: 14-0518
Comments for Public Posting: See attached letter requesting continuance.

November 14, 2024

Councilmember John Lee, Chair
and Members of the Planning and Land Use
Management Committee of the
Los Angeles City Council
200 N. Spring St.
Los Angeles, CA 90012
Via LACouncilComment.com

Re: Proposed Wildlife Ordinance
Hearing date: November 19, 2024
Council File 14-0518
Request for Continuance

Honorable Chair Lee and Members of the Committee:

This firm represents Gilcrest Properties, LLC (“Gilcrest”). Gilcrest owns properties that would be affected by the proposed Wildlife District ordinance (“Wildlife Ordinance”) and is strongly opposed to the Wildlife Ordinance in its present form.

Although this matter has been dormant for over a year, it has just come to our attention that the Wildlife Ordinance was recently scheduled for further consideration by the Planning and Land Use Management (“PLUM”) Committee on November 19, 2024. In order to ensure adequate time for Gilcrest and other interested parties to comment on the proposed ordinance, **we respectfully request that the PLUM Committee continue the hearing in this matter for a period of at least 90 days.**

As set forth in our letter to the PLUM Committee dated June 16, 2023, the Wildlife Ordinance would impose overly restrictive and unnecessary development regulations that would not advance the ostensible purposes of the ordinance. The Wildlife Ordinance would also subject property owners to a costly, time-consuming, burdensome, and unnecessary discretionary review process. Furthermore, the potential environmental impacts of the proposed ordinance have not been adequately evaluated, and approval of the Wildlife Ordinance based on a categorical exemption would violate the California Environmental Quality Act.

Chair Lee and Members
of the Planning and Land Use Management Committee
November 14, 2024
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For these and other reasons, the PLUM Committee should not rush its consideration of the Wildlife Ordinance but should instead take the time that is needed to carefully review the proposed ordinance and address the many procedural and substantive issues that have been raised by members of the public.

The proposed ordinance was just recently released by the City Attorney's office, and Gilcrest and other stakeholders were not given sufficient time to review and comment on the proposed ordinance. In order to ensure that all members of the public have a meaningful opportunity to comment on the proposed ordinance, the PLUM Committee should remove the Wildlife Ordinance from the PLUM Committee's November 19, 2014 agenda and should continue the matter for at least 90 days.

Thank you for your consideration.

Very truly yours,



JOHN M. BOWMAN
Elkins Kalt Weintraub Reuben Gartside LLP

Cc: Candy Rosales, Legislative Assistant (clerk.plumcommittee@lacity.org)

JMB:JMB