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Via Electronic Mail

November 8, 2024

Councilmember John Lee & Honorable Committee Members
Los Angeles City Council
Planning and Land Use Management Committee
200 N. Spring Street Rm 405
Los Angeles, CA 90012

**Re: Council File 14-0518 - Draft Wildlife District Ordinance
PLUM Hearing November 19, 2024
Request To Continue Wildlife Ordinance**

Councilmember Lee,

This firm represents property owners in connection with their homes and properties that would be affected by the proposed Wildlife District Ordinance, Council File 14-0518 (the “**Wildlife Ordinance**”). Just this morning we received word that the Wildlife Ordinance is anticipated to go before the City’s Planning and Land Use Management Committee (“**PLUM**”) on November 19, 2024. **We write to respectfully request a 90-day continuance of the PLUM hearing of the Wildlife Ordinance.**

Simply put, the Wildlife Ordinance contemplates regulations affecting private properties in a large swath of the City’s hillside area without proper review. The far-reaching nature of the Wildlife Ordinance, and its potential impacts on the community and a substantial number of properties over thousands of acres, warrants a reasonable review period. Ten days is simply not enough time to understand the Wildlife Ordinance and the changes that have been made hereto without public participation, which could significantly impact this City’s residents and landscape in perpetuity.

Further, the Wildlife Ordinance, as presented, raises serious concerns regarding compliance with State and Federal laws. We understand the City is attempting to use a Class 7 or Class 8 Categorical Exemption as a purported means to comply with the California Environmental Quality Act (“**CEQA**”). Given the scale, scope, impacts, and circumstances of the Wildlife Ordinance, the application of any Categorical Exemption is a dubious proposition. Relatedly, hastily tying the Wildlife Ordinance’s consideration to the potential implementation of the City’s Downtown Community Plan and Hollywood Community Plan updates raises further questions about using a Categorical Exemption and how the City defines its project under CEQA.

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Beyond CEQA, the Wildlife Ordinance has the potential to impact the State's housing resources at a time when housing is a statewide concern. We understand that the Wildlife Ordinance has the effect of reducing the intensity of residential density and imposing subjective development standards. These impacts potentially violate provisions of the State's Housing Crisis Act. Finally, the Ordinance has the practical effect of substantially limiting a property owner's use of their land, thereby effecting a taking of property.

The City should address these concerns before rushing to act. The Wildlife Ordinance has been dormant for more than a year, without public input, and it would be an abuse of discretion to rush it to a PLUM hearing without proper stakeholder involvement. Moreover, this is a far-reaching ordinance that will affect a significant swath of the City while potentially violating State and Federal laws. As a result, we respectfully request that the Wildlife Ordinance be removed from the agenda for the November 19, 2024, PLUM Committee meeting and that the public be given 90 days to properly review the Wildlife Ordinance and understand its impacts. We reserve all rights and remedies.

Very truly yours,

/s/ *Spencer B. Kallick*

Spencer B. Kallick

SBK

cc: Councilmember Raman
Councilmember Yaroslavsky
Karen Bass, Mayor of the City of Los Angeles
Vince Bertoni, Director of Planning
Hydee Feldstein Soto, City Attorney
John W. Heather, Chief Assistant City Attorney
California Dept. of Housing and Community Development