

Deputy: Luna



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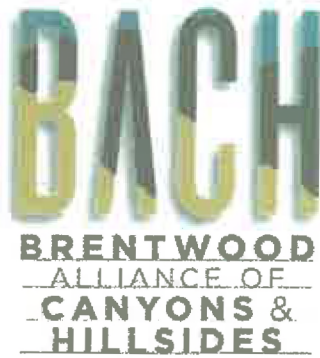


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WATERKEEPER®

the Paw
PROJECT



June 19, 2023

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

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

Dear Chair Councilmember Harris-Dawson and PLUM Committee Members:

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

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

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

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

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

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

Respectfully yours,

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

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

Marian Dodge, Chair
The Federation of Hillside and Canyon Associations

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

Gerry Han, President
Friends of Griffith Park

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

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

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

Mark Levine, Board President
Save Our Canyons

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

Randi Feilich, Wildlife Advocate,
Hollywood Hills Homeowner,
Realtor

Tom Freeman, President
Canyon Back Alliance

Dan Silver, Executive Director
Endangered Habitats League

Bruce Reznik, Executive Director
Los Angeles Waterkeeper

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

Eric Edmunds, Chair
Sierra Club Santa Monica Mountains Task Force

James Hines, Team Leader
Sierra Club California Wildlife Team

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

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

Claire Schlotterbeck, Executive Director
Hills for Everyone

Martha Camacho Rodriguez, Director
SEE (Social Eco Education)

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

Marcia Hanscom, Community Organizer
Defend Ballona Wetlands

Robert Roy van de Hoek, Wildlife Biologist
Ballona Wetlands Institute

Jennifer Conrad, DVM, Director
The Paw Project

Lisa Levinson, Campaigns Director
In Defense of Animals

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

Team Marine, Santa Monica High School

Tracy Quinn, President & CEO
Heal the Bay

Andy Shrader, Father of two

6-20-23

Regarding WILDLIFE ORDINANCE CF-14-0518

Dear council person , Dear decision makers

A :

I object to basement size and grading quantity limitations ;

We just went through major ordinance covering the hillside , in 2018. Why another attempt on further decrease in size , with a mis-named ordinance that has nothing to do with wild life. !!!

Eliminating the basement sq footage . Counting the Grading quantities from the basement. How would such a requirement help either the wild life or even the ridge line protection. Why would someone place such burden on property owners if it does not serve any of the such mentioned intentions. These grading volumes are coming from below structures and do not impact on any wild life , nor will have any visual effect consequences. But they will make many building non economical. And many houses too small. And reduce the Property tax and school tax basis. All this to the benefit of no one.

only argument supporting the basement reduction I have seen is that it creates burden on streets while exporting the dirt and also have our effect on land alteration.

1- Already there are numerous ordinances that have passed (only within the last 10 years) placing limitation on grading quantities and haul routs. where will this continues crusade stop.

this matter has already been addressed.

2- if by land alteration , one means the alteration at the property under construction , what kind of statement is this ? the alteration is happening from below footprint of the building. very illogical statement.

if it means alteration at the receiving property , those properties are usually out of the crowded city areas and do not have any impact on the city of LA. and many cases are used for fabrication flat lands in the county or outside of the county.

3- depriving the city for revenue , now and during the life of a house (for a century or so) , only to have less driving on the streets while exporting the dirt is illogical.

just think of it ;

especially if you are so pro education and pro other services that you expect the city to provide for the poor and environment.

loss of school fees at the permit stage ,

loss of property tax (almost as much as 30% of the tax revenue) for almost a century.

who loses ? Poor , students , fire , environment , and

who gains , no one

rents increase in the city , since less room to live or rent or have ADU

less space to have basement garages , and that will burden the hillside streets .

less space for family expansion.

with elimination of basement , or reduction of it , no visual gain for the city , no visible land alteration , no wild life protected ,

Please think

Why are you even considering this.

All you need to do is to have one sentence added to the previous ordinances ,. limit the basement boundaries to the footprint of the floor above it. that is it.

no other limitation is logical. not even placing grading quantity limitation , nor square foot limitations.

placing other limitations on basement size or inclusion of its grading in the grading quantities is like the city shooting her own leg, with absolutely no gain for any one nor for environment , but many many losses at many front . losses for home owner , for poor , for schools , for fire services , for other environmental services, for human services that city provides and needs the revenues for. !!!!!!!!!!!

take 1000 sq ft limitation out

take the grading quantity inclusion out

we need more space and what better way than having this space coming from below the footprint without other visual effects on the city .

Date: 6 / 20 / 23

Submitted in PLUM Committee

Council File No: 14-0518

Item No. 19

Deputy: Luna

I would think , a liberal, pro environment person would welcome and support such means. a larger basement will be all gains for such an activist .
Think Think Think

B :

Objection to preventing construction on grades exceeding 30 degree slopes.

more than half of the slope lots fall within such slopes. preventing construction on those slopes will have **many many** negative impacts on people's use of land and size of their house .
there is a better solution to a concern.

Requiring a Landscape Architect to address

plants surrounding certain distance of the buildings. with sensitivities to water saving plants.

Rather than placing a no construction on such slopes , look for constructive solutions that while addressing environmental concerns , also at the same time allow building size that is needed so badly for the city .

we need more space to live and rent and more revenues to support city services. so look for solutions. rather than just a blanket prevention of construction. That is not a solution.

allow creative minds to address legitimate concerns without losing badly needed livable space.

it is interesting that a liberal Government in the state capital is pushing for more habitable space while liberals within the city of LA are hard at work to minimize habitable space in any which way they can , without considering that such a push , will increase the rents , decrease the city revenues and no gains for environment. Environment will also loose.

please have a wider vision and evaluation of the continuous crusade on limiting the production of habitable space within the city boundaries .

you are hurting the poor and wealthy with these shallowly studied ordinance proposals.

look for a gain gain solutions,

and not for a loss loss

or for a zero sum solutions.

please. be creative. not just anti development.

Michael Mohammad Guivatchian

818 917 0025

4720 Degovia Ave

Woodland Hills ca 91364

Case Study Examples of Proposed Ordinance Impacts

Date:

6/20/23

Submitted in PLUM Committee

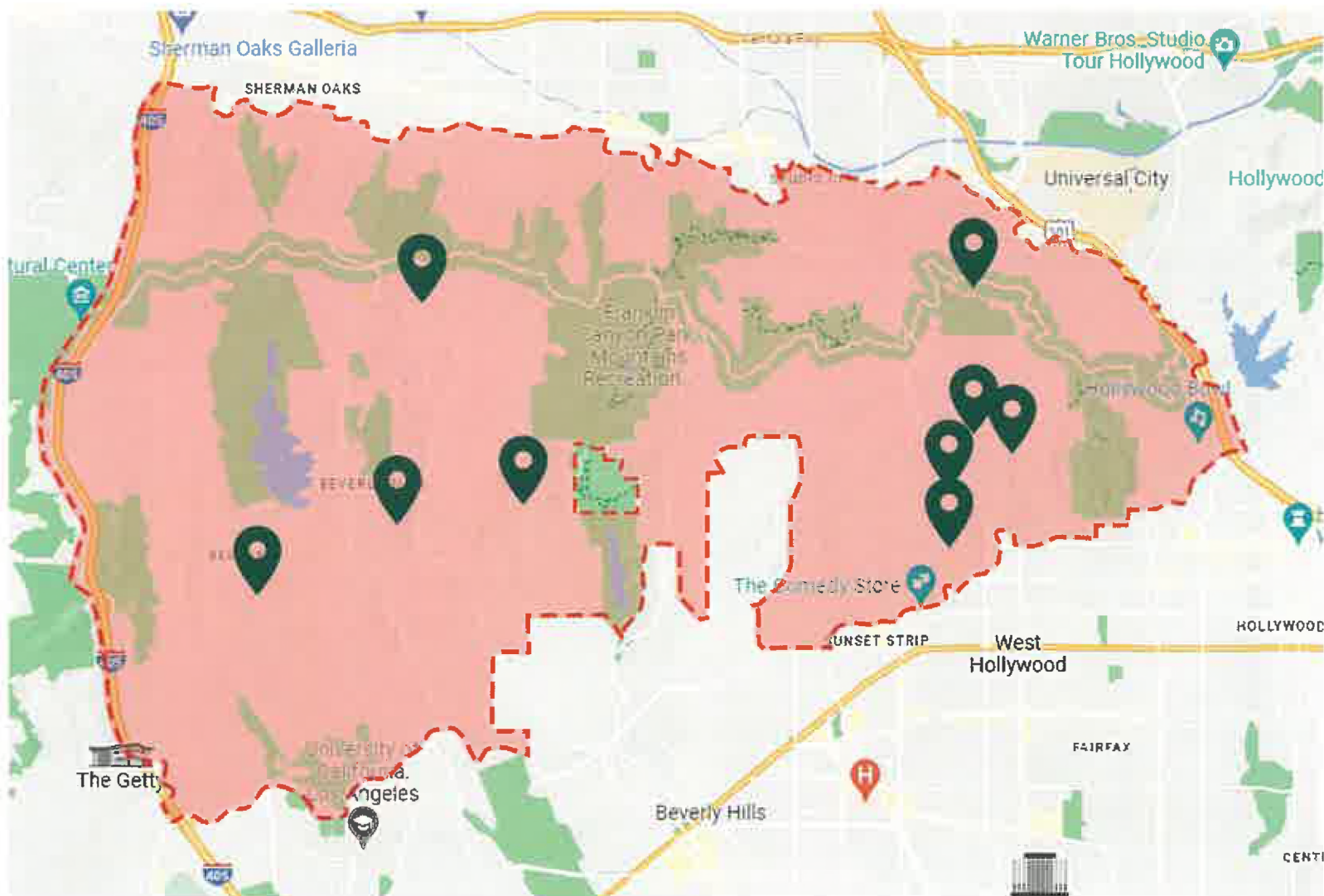
Council File No. 14-0518

Item No. 19

PLUM

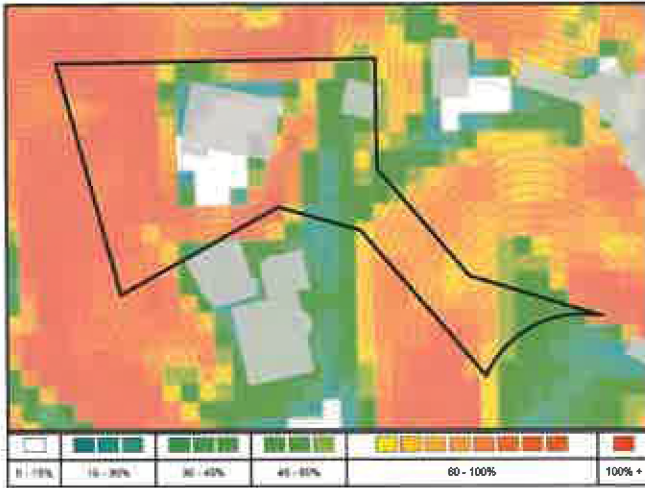
As you will see on the following pages, properties taken from multiple locations throughout the Hillside Area of Los Angeles show the square footage allowance impacts of the new proposed and modified Wildlife Ordinance.

The data was produced through online databases which analyze allowable square footage per a slope band analysis and then reduced based on basement exemptions and an estimate of slopes of over 60%.



Case Study #1

8573 Franklin Ave, Los Angeles, CA 90069



Lot Size: 20,942 sq. ft.



Allowable Sq. Ft.: 8,090 sq. ft.

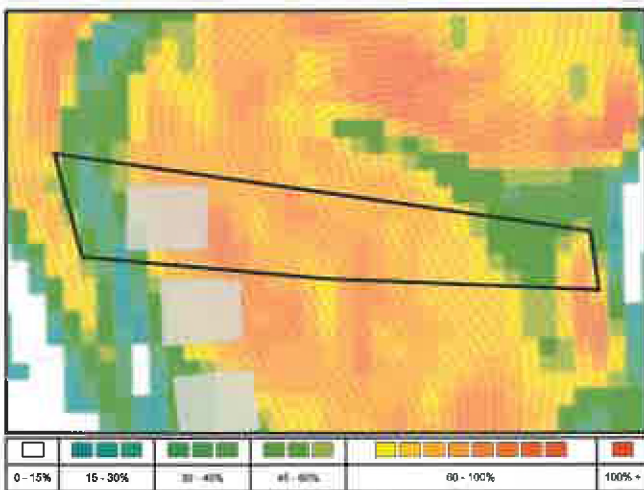


Proposed Sq. Ft.: 3,588 sq. ft.

Percent Reduction: 56%

Case Study #2

1368 Angelo Dr, Los Angeles, CA 90210



Lot Size: 14,997 sq. ft.



Allowable Sq. Ft.: 5,323 sq. ft.

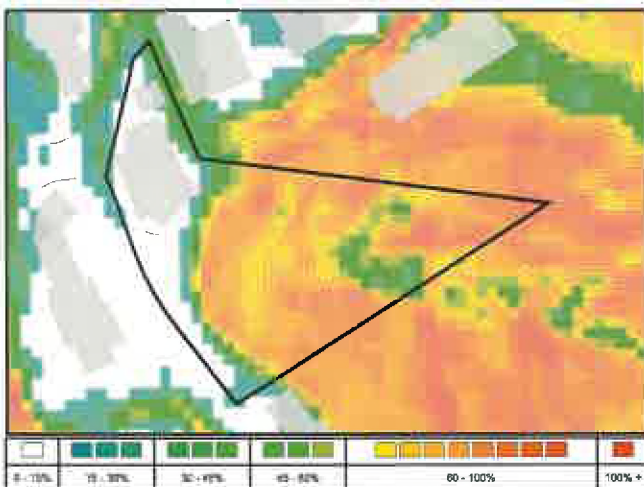


Proposed Sq. Ft.: 1,750 sq. ft.

Percent Reduction: 67%

Case Study #3

1234 Bel Air Rd, Los Angeles, CA 90077



Lot Size: 55,960 sq. ft.



Allowable Sq. Ft.: 19,027 sq. ft.

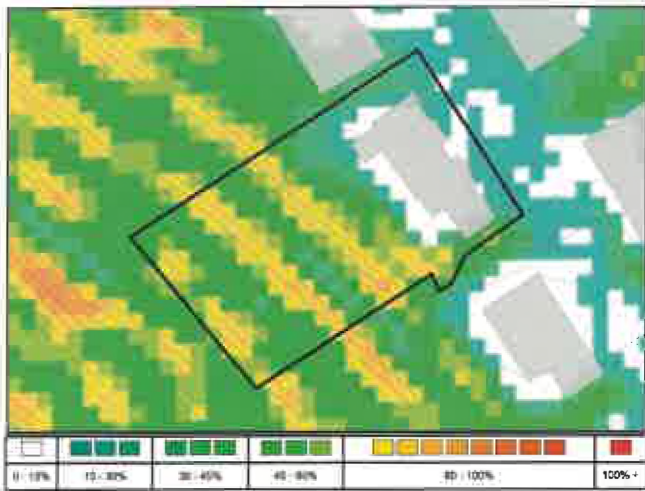


Proposed Sq. Ft.: 8,129 sq. ft.

Percent Reduction: 57%

Case Study #4

2129 Hercules Dr, Los Angeles, CA 90046



Lot Size: 27,088 sq. ft.



Allowable Sq. Ft.: 11,200 sq. ft.

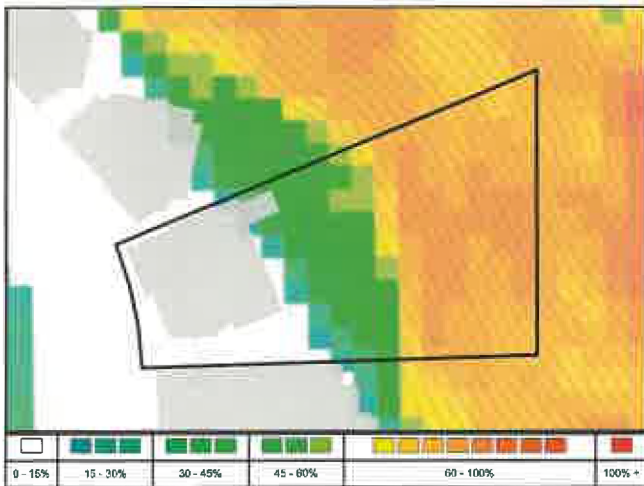


Proposed Sq. Ft.: 5,700 sq. ft.

Percent Reduction: 49%

Case Study #5

2014 Hercules Dr, Los Angeles, CA 90046



Lot Size: 16,041 sq. ft.



Allowable Sq. Ft.: 6,025 sq. ft.

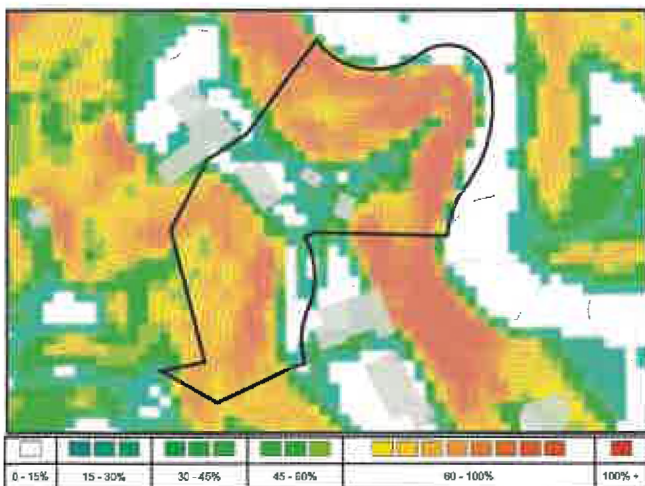


Proposed Sq. Ft.: 2,806 sq. ft.

Percent Reduction: 53%

Case Study #6

3145 Coldwater Canyon Ave, Studio City, CA 91604



Lot Size: 55,308 sq. ft.



Allowable Sq. Ft.: 19,800 sq. ft.

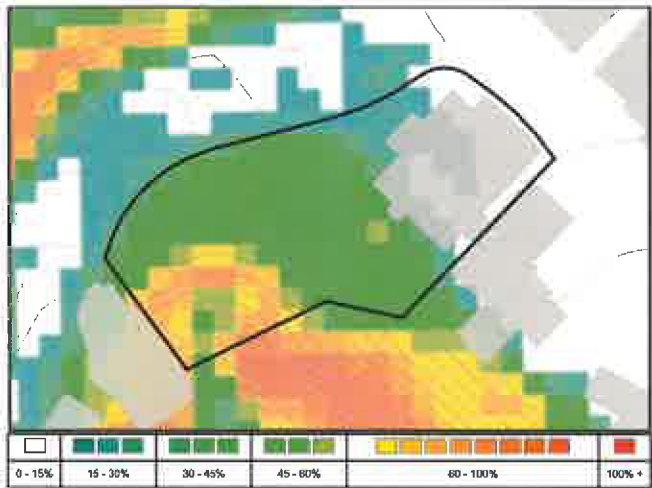


Proposed Sq. Ft.: 7,558 sq. ft.

Percent Reduction: 70%

Case Study #7

8228 Bellgave Pl, Los Angeles, CA 90069



Lot Size: 15,431 sq. ft.



Allowable Sq. Ft.: 7,000 sq. ft.

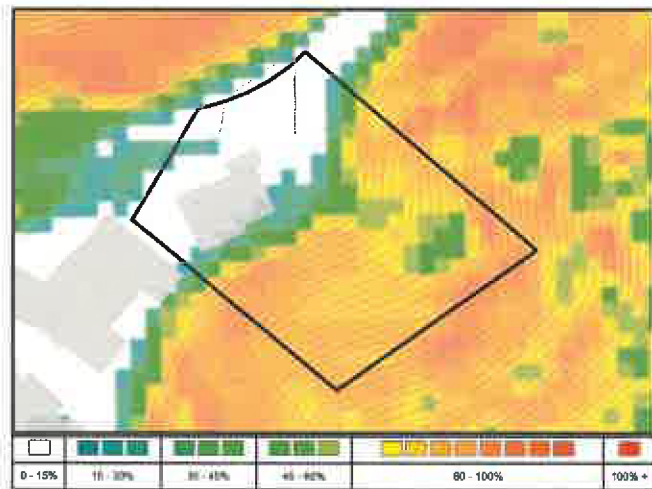


Proposed Sq. Ft.: 3,735 sq. ft.

Percent Reduction: 46%

Case Study #8

2300 Astral Dr, Los Angeles, CA 90046



Lot Size: 30,737 sq. ft.



Allowable Sq. Ft.: 10,690 sq. ft.

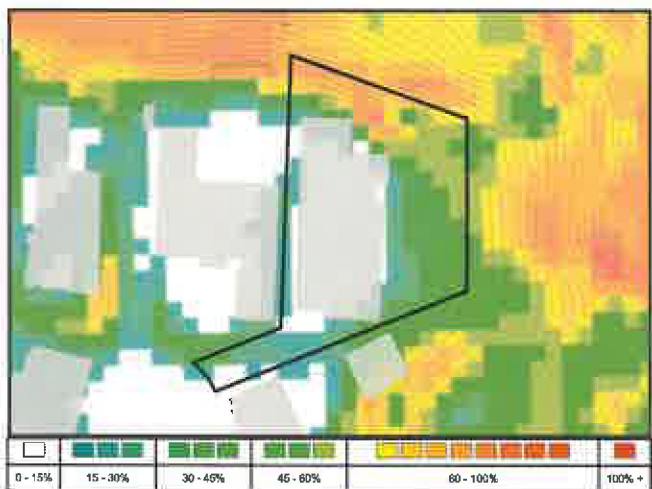


Proposed Sq. Ft.: 4,710 sq. ft.

Percent Reduction: 55%

Case Study #9

1470 Laurel Way, Beverly Hills, CA 90210



Lot Size: 18,678 sq. ft.



Allowable Sq. Ft.: 8,019 sq. ft.



Proposed Sq. Ft.: 4,738 sq. ft.

Percent Reduction: 41%



Friends of Griffith Park
P.O. Box 27573
Los Angeles, CA 90027-0573
friendsofgriffithpark.org

Date 6/26/23
Submitted in PLUM Committee
Council File # 14-0518
Item No. 19
Deputy: Wm

June 17, 2023

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

RE: Strong Support for Wildlife Ordinance

Dear Chair Harris-Dawson and Councilmembers:

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

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

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

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

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

Sincerely,

Gerry Hans, President



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

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

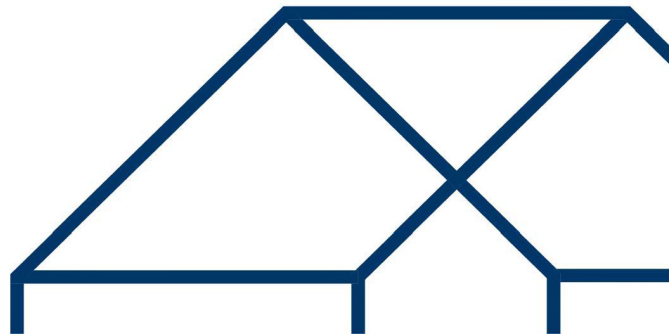
To the Members of the Planning and Land Use Management Committee:

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).



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)

June 20th, 2023

Via Email

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

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

Dear Honorable Members and Los Angeles City Planning Staff,

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

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

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

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

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

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

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

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

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

Most homes in my neighborhood have slopes greater than 60% (31 degrees), and most of these homes are relatively smaller 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 the majority 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) 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 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 the 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 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 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.

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,

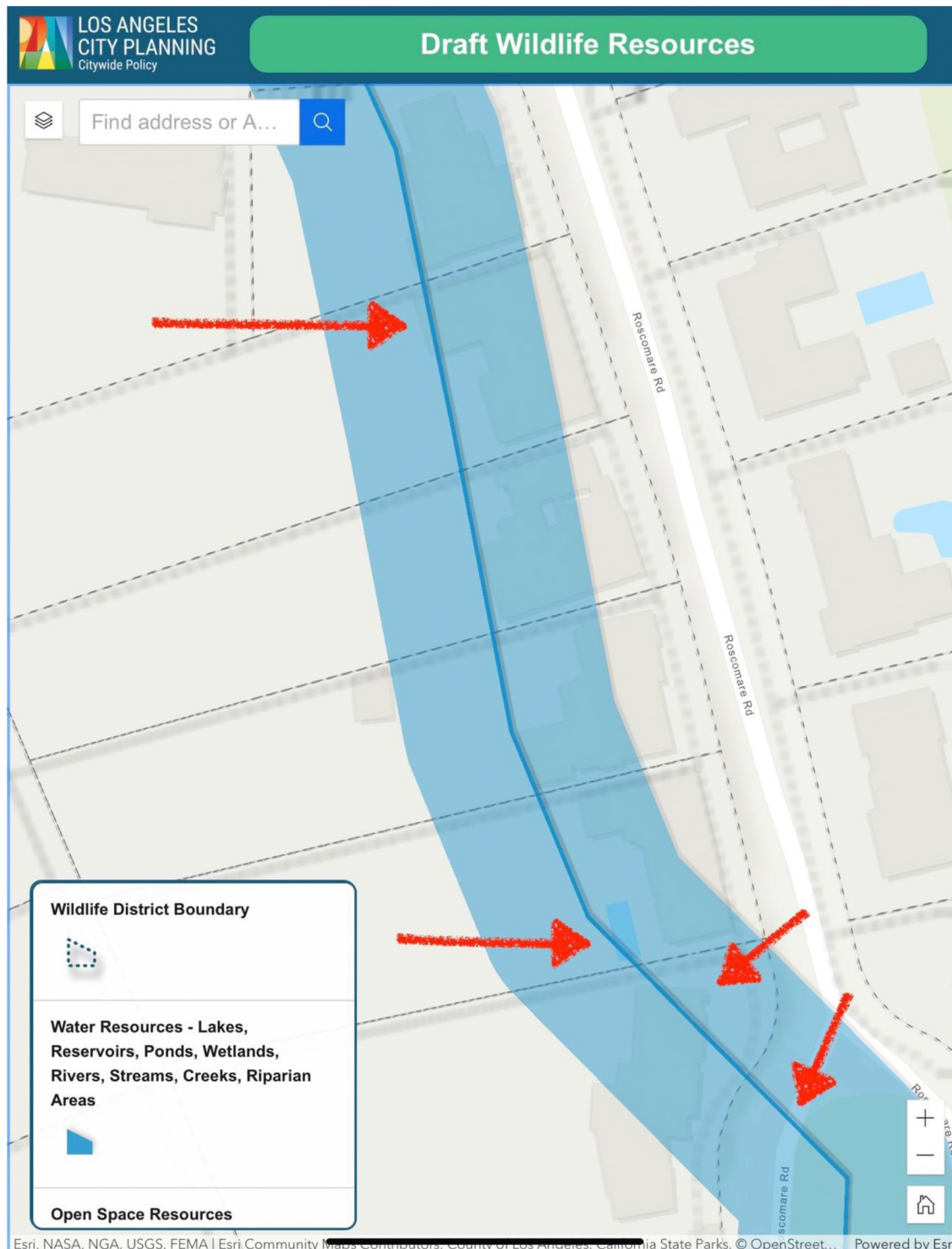
James B. Rea, Jr.
2305 Donella Circle
Los Angeles, CA 90077
Home Owner
Phone: (310) 617-9589
Email: james.b.rea@bofa.co

Exhibit 1

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

The Wildlife Resource so depicted does not exist.

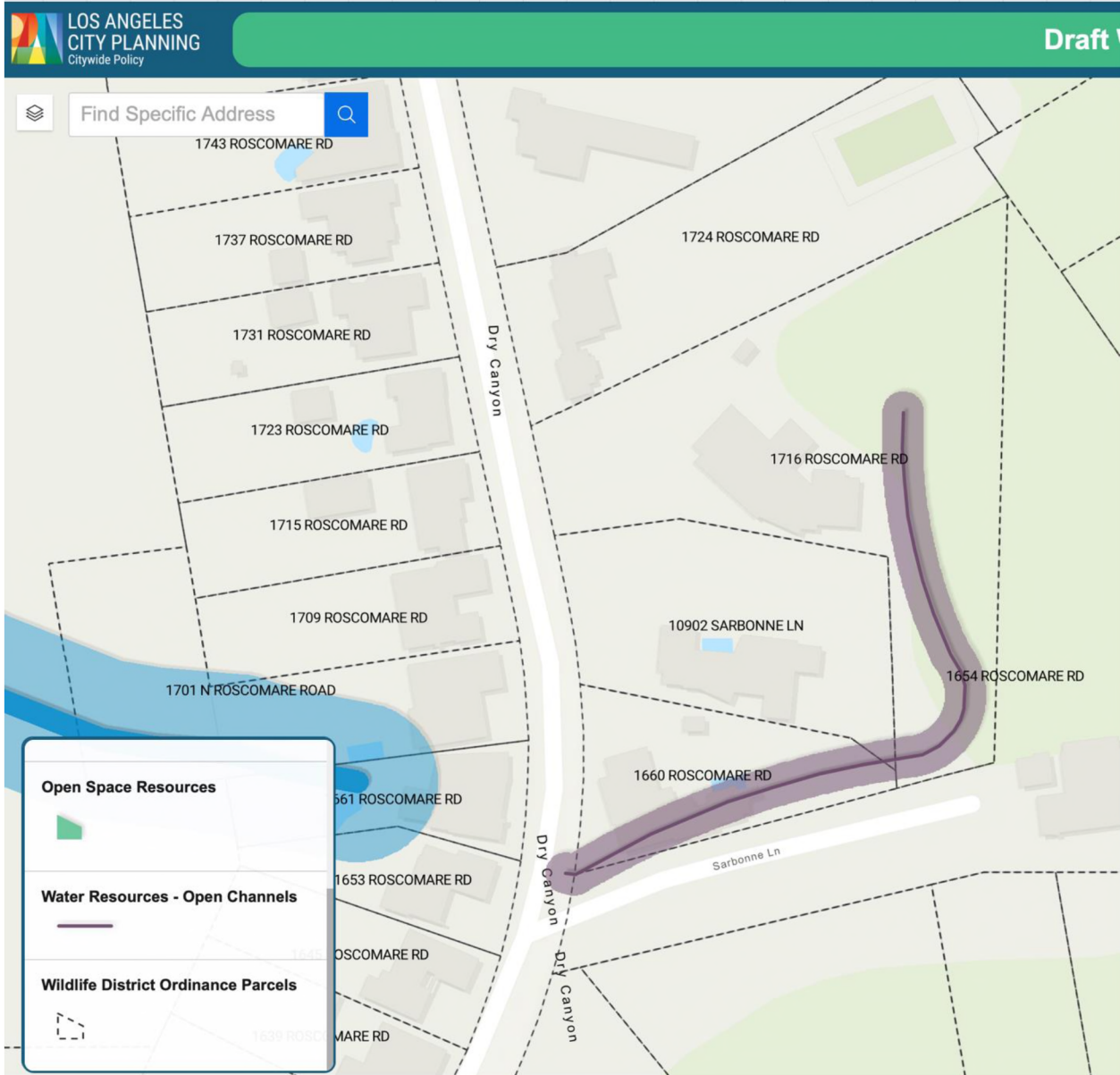
Source: Current Planning Department Wildlife Resource Map, captured on November 14th, 2022



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

The Wildlife Resource so depicted does not exist.

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





Daniel Luna <daniel.luna@lacity.org>

Public Comments Not Uploaded LET PEOPLE IN THE MEETING!!! - Re: CALL TO ACTION Wildlife Ordinance Meeting on June 20th

APEX Real Estate Designs <apexredesigns@gmail.com>

Tue, Jun 20, 2023 at 2:43 PM

Reply-To: clerk.plumcommittee@lacity.org

To: clerk.plumcommittee@lacity.org

See attached pics of the line outside.

Let more people into the meeting!!!

This should not be done without the appropriate public comment period!!!

Everyone is already talking about class action if this goes through in this manner.

Killing the economy should be done in the open if it's done at all.

This bill will kill the economy.

PLEASE OPEN THE DOORS FOR PUBLIC TO COME IN!!!

Thank you

On Mon, Jun 19, 2023, 11:21 AM APEX Real Estate Designs <apexredesigns@gmail.com> wrote:

Hi LA City Leaders,

As a lifelong resident who was born at UCLA in 1980, I am scared of this new proposal that will drag the city down a dark path of investment flight, a lower available city fiscal budget and even more extreme homelessness.

At a time when housing shortages are in all of the news stories, 2 councilmembers are looking for ways to hurt the property owners and developers of the city.

Like many other issues recently, trying to rashly adjust one problem many times only leads to a host of other problems.

This plan on the new wildlife ordinances brings very little benefit but causes great harm to the communities that it's claiming to help.

The tax paying property owners who fund these ideas are directly affected financially by these half baked ideas and threaten their investments and retirement savings.

The trickle down affect ends up being that these property owners will have less funds to contribute to extra housing for the poor, less tax revenue for the city and overall less ability to hire and help those in need.

Remember the old quote of "high tide lifts all boats" while also understanding the opposite of a low tide lowers all boats.

Please don't bring a low tide to the city's housing and real estate needs. We know you mean well. Unfortunately some of the best intentions go horribly wrong.

Please save our city from this potential downfall.

And yes, we are stake holders who can promise you that the potential consequences of this proposal will be dire.

This will cost a lot of money to a lot of people and also put a lot of developers who are currently interested in building affordable housing in a different mind set where their investments will go elsewhere.

We are asking the city not to shoot itself in the foot...

Not to mention, according to state law this whole idea is illegal to begin with. Please don't bog the city down in a costly and lengthy legal fight over something that hardly any real stakeholder wants.

It's not good for the homeless, home owners, construction workers with supporting businesses, and anyone else who wants to live on a thriving city.

Many of those people need the city's support but unfortunately if this passes the city will have less revenue from permits, material sales, wage taxes, professional services taxes, lunch time restaurant revenue loss, less beds for people to sleep on and many more...

This proposal will have the UNINTENDED CONSEQUENCE of hurting all of these people as well. Is that something that the council really wants to take credit for (especially considering how the writers strike is hurting people not even in the film industry but a support business).

When debating this proposal all i ask is you to keep in mind all of the SUBSTANTIAL UNINTENDED CONSEQUENCES this law will have.

Please think of all of the people of city and not just a limited few squeaky wheels...

There are a lot more points to be addressed but I will keep this email brief. Please just know, in the end this proposal will do more overall harm than good to the city by more than a factor of 10!
I'm sure nobody wants to be associated with those type of terrible numbers.

Thank you for taking the time to read our concerns - I hope you make the helpful choice for your constituents and currently the great city of Los Angeles...

Paul

Apexredesigns@gmail.com


----- Forwarded message -----


From: **LA Land Man | Shawn Kormondy** <info@skorreg.com>

Date: Mon, Jun 19, 2023, 6:02 AM

Subject: CALL TO ACTION Wildlife Ordinance Meeting on June 20th


To: <apexredesigns@gmail.com>





LA-LAND-MAN.COM
THE AUTHORITY IN LAND SALES

SHAWN KORMONDY
323-638-7567 WWW.LA-LAND-MAN.COM



Dear Neighbors,

The Wildlife Ordinance is scheduled to be heard this coming Tuesday, June 20th, at 2pm, and NO public notice has gone out. Behind closed doors newly appointed Councilwoman, Katy Yaroslavsky, and Nithya Raman have created and submitted a joint letter to the Planning and Land Use (PLUM) Committee to make the proposed Wildlife Ordinance **MORE RESTRICTIVE** and burdensome for property owners.

Example: xxxx Loadstone Dr. in Sherman Oaks is a lot that is just under 8,500sf lot. The current home is single level, just over 2,500sf and currently can be renovated or replaced with an approximate 2-story 4,250sf home (about half the lot size). If the Wildlife Ordinance passed with the councilwomen's additional restrictions, the new total buildable area could only be 2,300sf (which includes the garage). This is a reduction of approximately 46%, and smaller than the current home. There are thousands of examples with similar losses!

Not only did the councilwomen submit the attached letter (https://clkrep.lacity.org/online/docs/2014/14-0518_misc_06-13-23.pdf) without notifying their constituents, Yaroslavsky's office did not disclose the letter or the upcoming hearing when I specifically asked about the hearing this past Monday...AND...insiders,

such as members of the Hillside Federation, have known about this upcoming hearing for at least a week!

It's time to get into action! Over the next few days, we each need to set aside 10-30 mins of our time to contact the PLUM committee members and our councilwomen. We are supportive of the measures in the ordinance that are directly related to properly protecting wildlife, but **reducing people's buildable size by 50% is an outrageous downzoning, extremely financially harmful and completely unnecessary.**

Here is our quick 2-part request:

1. Email & call the PLUM committee members, your Councilmember, City Attorney and any other city official contacts you have. Contact information is below. Let them know you would like them to remove the Wildlife Ordinance from their June 20th meeting agenda until proper outreach has been conducted with their constituents, not activist groups that endorsed their campaigns. Get those calls in today! Send emails over the weekend! Call again on Monday! Your voice matters!

2. PLEASE SHOW UP TO ASK THE CITY TO APPROVE THE WILDLIFE PROTECTION MEASURES WHICH EVERYONE SUPPORTS AND STOP THE NEARLY 50% OR MORE REDUCTION IN ALLOWABLE SQUARE FOOTAGE UNTIL PROPER DISCUSSIONS AND RESEARCH HAS BEEN DONE WITH APPROPRIATE PUBLIC OUTREACH.

CHANGE WILL ONLY HAPPEN IF YOU SHOW UP!!

PLANNING AND LAND USE MANAGEMENT COMMITTEE

TUESDAY, JUNE 20, 2023 2:00 PM

JOHN FERRARO COUNCIL CHAMBER

ROOM 340, CITY HALL

[200 NORTH SPRING STREET, LOS ANGELES, CA 90012](#)

The Committee will take public comment from members of the public in person only; there will be no public comment by teleconference.

If you need some bullets to formulate an email to send to the city officials, here are some recommendations:

1. Property owners are not opposed to good policy for promoting wildlife and open space protection. However, these new regulations do not work to preserve large open spaces. They don't create corridors between these open spaces that are as free from potential human contact as possible. In fact they do very few things that are actually good for wildlife. This ordinance will gravely affect small property owners, not the mega mansion developers they are claiming to be going after.
2. This set of regulations sets the City in a direct path towards confrontation within the state. This is down-zone plain and simple and thus will run afoul with State law—including CEQA, HAA and other rules regarding zoning. It will end up tying the city up in lawsuit knots- for no reason. It will make our housing shortage worse. It will cause more population outflows. And without truly helping wildlife in the region.
3. Due process—this ordinance has been pushed by bureaucratic insiders. It has yet to be fully vetted or even discussed in an open and honest way. Most people in the hills still don't realize what is happening. There have been no major studies on the environmental, economic and housing impacts of this ordinance. There has been no effort made to track down who will be negatively impacted—and how badly. Instead this ordinance continues to be shuttled around the back hallways of City Hall without being truly and openly debated.
4. We ask the PLUM Committee send this ordinance back to the planning department to be fully vetted, to have the parts of the rules removed that don't directly help wildlife and to expand those elements that truly help our wildlife—by formally designating our open areas, to plot out how to connect these habitats and corridors in a way that keeps wildlife out of harm's way (i.e. away from people), and efforts that true wildlife experts have suggested will help LA maintain its unique and wonderful access to nature.

Although we are rushed, we have to work with what we have, so start typing and dialing like your home depends on it!

PLUM Committee:

MEMBERS: COUNCILMEMBER MARQUEECE HARRIS-DAWSON,

CHAIR COUNCILMEMBER MONICA RODRIGUEZ COUNCILMEMBER KATY

YAROSLAVSKY COUNCILMEMBER JOHN S. LEE COUNCILMEMBER HEATHER HUTT

(Candy Rosales - Legislative Assistant - (213) 978-1078
Questions can be submitted to clerk.plumcommittee@lacity.org)
Submit written comment at LACouncilComment.com

Councilwomen:

Katy Yaroslavsky District 5: 213 473-7005
Nithya Raman District 4: (213) 473-7004

City Attorney:

Hydee Feldstein Soto: (213) 978-8100

EMAIL LIST:

kevin.keller@lacity.org
jarrett.thompson@lacity.org
jenelle.henderson@lacity.org
Councilmember.Yaroslavsky@lacity.org
contactCD4@lacity.org
mayor.helpdesk@lacity.org
cityatty.help@lacity.org
councilmember.harris-dawson@lacity.org
councilmember.rodriguez@lacity.org
cd10@lacity.org
councilmember.Lee@lacity.org

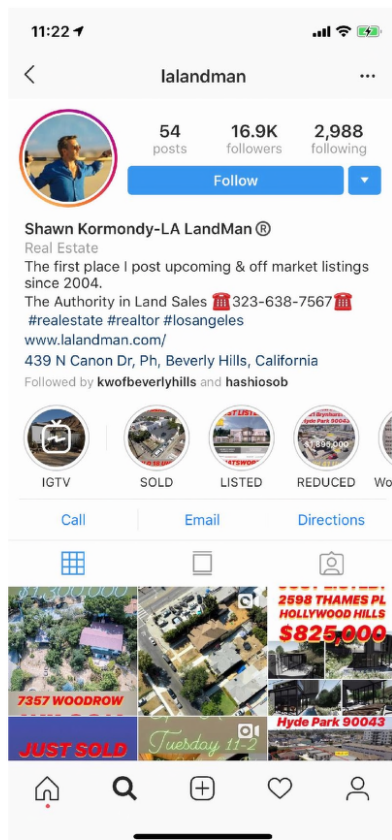
** If you are attending the hearing please respond to this email.

If you need additional information please reply to this email.

See below for the Ordinance;

<https://planning.lacity.org/plans-policies/wildlife-pilot-study>

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SHAWN KORMONDY
323-638-7567 WWW.LA-LAND-MAN.COM



Skor Real Estate Group | [439 N Canon Dr](#), Penthouse, Beverly Hills, CA 90210

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2 attachments



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3213K





CITY HALL



Daniel Luna <daniel.luna@lacity.org>

Public Comments Not Uploaded Proposed Wildlife Ordinance1 message

'Sam Ghahremanpour' via Clerk-PLUM-Committee <clerk.plumcommittee@lacity.org>

Tue, Jun 20, 2023 at 2:00 PM

Reply-To: clerk.plumcommittee@lacity.org

To: clerk.plumcommittee@lacity.org

Cc: kevin.keller@lacity.org, jarrett.thompson@lacity.org, jenelle.henderson@lacity.org, Councilmember.Yaroslavsky@lacity.org, contactCD4@lacity.org, mayor.helpdesk@lacity.org, cityatty.help@lacity.org, councilmember.harris-dawson@lacity.org, councilmember.rodriquez@lacity.org, cd10@lacity.org, councilmember.Lee@lacity.org

Dear Mrs. Yaroslavsky, council members, and representatives,

I am writing you to inform you of my displeasure regarding the proposed ordinance on wild life and open space protection. Although I am a big proponent of preserving wildlife and appropriate open spaces, the proposed new regulations do not work to preserve large open spaces. This ordinance will gravely affect small property owners like myself.

This set of regulations sets the City in a direct path towards confrontation with its constituents like myself.

Furthermore the lack of due process and transparency by the proposing counsel members is a disappointing reflection that our newly elected leaders are representing their own beliefs and not their constituents. This ordinance should be fully vetted or even discussed in an open and honest way. Most people in the hills still don't realize what is happening. There have been no major studies on the environmental, economic and housing impacts of this ordinance. There has been no effort made to track down who will be negatively impacted—and how badly. Instead this ordinance continues to be shuttled around the back hallways of City Hall without being truly and openly debate.

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

Best,

Sam Ghahremanpour
Homeowner in 90024

Sent from my iPhone