



Fwd: Council File Number 22-0600-S54

1 message

Office of the City Clerk <cityclerk@lacity.org>

Thu, Aug 24, 2023 at 8:11 AM

To: City Clerk Council and Public Services <clerk.cps@lacity.org>

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

From: **Stephanie Landregan** <landregan@att.net>

Date: Thu, Aug 24, 2023 at 8:03 AM

Subject: Council File Number 22-0600-S54

To: CityClerk@lacity.org <CityClerk@lacity.org>

To: Energy and Environment Committee

Honorable Council members YAROSLAVSKY, McOSKER, RAMAN, BLUMENFIELD and HERNANDEZ

Dear Council members,

After reading the Bureau of Sanitation's report, in response to the City Council's request on why there is a backlog of LID permits, I am astonished at the proposed solution: to weaken the LID! None of the supplied reports from BOS indicate problems with the LID's protection of the watershed, stormwater management, or it's efficiency. The problems indicated are with processing the volume of development permits!

Here is a list of issues:

1. - LA San wants to remove certain projects from having to meet stormwater BMPs to address backlog and to help expedite permits
- 2.- The current LID ordinance includes "Small Scale" projects of 4 units or less
- 3.- LA San wants to exempt small-scale projects from their LID thresholds
- 4.- Small scale projects are not subject to MS4 Permit requirements but are and should continue to be regulated by the City's LID Ordinance. Annually, the LID Counter receives approximately 9,500 new projects, of which about 5,800 (61%) are Small Scale projects.
- 5.- The proposed solution to the backlog is LOWERING the threshold to align with MS4 requirements, which requires only projects that exceed 1 acre in size or involving changes of 10,000 sf or more of impermeable area will be subject to LID requirements, unless located in an environmentally sensitive area (most of the city is not designated as such)
- 6.- We all know that Los Angeles is a highly urbanized, impervious city, this change would leave out a very large segment of single-family homes, small scale multifamily development, and mid-sized lots.
- 7.-While streamlining is important, there are other ways to address the backlog. Our LID goal should be to ensure greater permeability, landscaping, and open space in site design to avoid

runoff and pollution, which are straining our stormwater systems, compromising our watershed, biodiversity and soil health!

8.- Each lot has the potential to hold several thousands of gallons of stormwater each year, through active and passive stormwater systems

9.-- Streamlining can be achieved without compromising critical sustainability goals

10- In 2012, when the LID ordinance was adopted Los Angeles demonstrated leadership in going beyond the minimum LID requirements established by the State of CA. Los Angeles has set an example of responsible stewardship of our watershed through our strong LID requirements which are applied at various scales.

Exempting such a large swath of projects will jeopardize the City's watershed goals precisely at a time when we need to be thinking about climate change and scarce resources. Within all the reports, the LID's effectiveness has never been questioned! The efficiency of BOS processing permits has!

The change in the definition of "Redevelopment" proposed is evidence of the minimizing of the strong guidance the present LID provides. Comparison of the original definition and the watered-down proposed definition is drastically different.

From:

"Redevelopment" means land-disturbing activity that results in the creation, addition, or replacement of 500 square feet or more of impervious surface area on an already developed Site. Redevelopment includes but is not limited to: the expansion of a building footprint; addition or replacement of a structure; replacement of impervious surface area that is not part of routine maintenance activity; and land disturbing activity related to structural or impervious surfaces. It does not include routine maintenance to maintain original line and grade, hydraulic capacity or original purpose of facility, nor does it include emergency construction activities required to immediately protect public health and safety. (2011)

To:

"Redevelopment" means the reconstruction or rehabilitation of any residential, industrial, commercial, retail, or other non-residential land use projects, including any private or public agency projects. (Proposed 2023)

Applying stormwater principles at various scales through the original LID ordinance has been a success for Los Angeles, creating responsible developments.

I urge the committee to work with the Bureau of Sanitation on finding efficiencies in processing and leave the present LID as it stands.

As elected officials you have accepted the duty to promote sustainable practices in the exercise of policy. Please embrace that duty in this situation.

Thank you,

Stephanie V. Landregan, FASLA, MSPM, LEED® AP BD+C
CA Landscape Architecture license #4093

UCLA Extension

Program Director, Landscape Architecture Program and
Horticulture and Gardening Program

UCLA Extension, Department of the Arts

310.825.9414 O/310.825.1735 direct line

UCLA Extension Mission: "To provide knowledge and connections for people to achieve their personal and professional goals"