

Communication from Public

Name: Jamie Myer

Date Submitted: 02/13/2023 01:35 PM

Council File No: 14-0518

Comments for Public Posting: Please put the Site Plan review trigger back to 7500sf RFA. There are already enough limits on construction in these zones, we don't need any more bureaucracy.

Communication from Public

Name: Shelley Billik
Date Submitted: 02/13/2023 08:43 PM
Council File No: 14-0518
Comments for Public Posting: Attached is the letter from the Community Forest Advisory Committee (CFAC) dated July 7, 2022.



July 7, 2022

Department of City Planning
City of Los Angeles
221 North Figueroa Street, Suite 1350
Los Angeles, California 90012

Re: Comments on Revised Wildlife District Ordinance, CPC-2022-3413-CA and CPC-2022-3712-ZC

To Conni Pallini-Tipton and staff:

The Community Forest Advisory Committee (CFAC) was formed many years ago to improve the state of our City's urban forest by convening community representatives from the 15 council districts and a Mayor's representative. Committee members are chosen by their councilmember and appointed by the Mayor to advise the City on practices & policies, and advocate on behalf of our urban forest for the betterment of all Los Angeles' residents, both human and animal. It is in this capacity that we commend the Planning Department for your painstaking efforts thus far in creating the drafts of the long-awaited Wildlife District Ordinance.

CFAC is aware of the loud pushback and fearmongering that has been peddled by the opposition who feel that the ordinance threatens property values and their way of life. While we listen to the opinions of others, the goals of the Ordinance are far too important and urgent to be stalled or diminished by these few loud voices. With the Federal directive and State goals of protecting 30% of open lands by 2030, as well as the scientific evidence that the threats to nature are upon us now, it is critical that everyone participates in protecting our public ecosystem, and living in a natural hillside community comes with a certain degree of responsibility and reasonable restrictions in order to ensure that the natural life of the hillside endures into the future. It is the City's responsibility and moral obligation to enact policies which strike a balance between personal gain and the greater good of Los Angeles. We feel that the Wildlife District Ordinance seeks to strike that balance, which for far too long has been leaning in the direction of rampant, destructive development and self-interest at the expense of natural resources, biodiversity, open space, and climate-resilience. The current and continued threats of climate change and biodiversity loss show that we do not have the luxury of caving under pressure when our last-remaining natural refuges and resources are at risk.

To that end, we offer the following suggestions to the current draft:

- 1) To Section (f) *Vegetation & Landscaping*, subsection (2) *Regulations*, (i) *Trees*, b. *Significant Tree Removal, Relocation and Replacement*, we offer the following amendment:

- a. Any proposed significant and/or protected tree removals must be approved by UFD or their assigned agents prior to deeming a permit application complete.
 - b. Any construction or grading activity requiring a permit that proposes to expand a building or structure's footprint and impacts any significant and/or protected trees, must require a site plan review with existing trees indicated, and demonstrate that alternatives to avoid impacts to these trees have been pursued, prior to final design.
 - c. Significant and protected tree maintenance shall be limited to removal of dead wood, and pruning of branches not to exceed 2 inches in diameter and 25% of live canopy within a two-year period.
- 2) In consort with the 2021 City Council Santa Monica Mountain Zone Resolution (CF 21-1284), which formally recognizes the SMMC as the CEQA trustee agency, we would also like assurances written into this ordinance that include SMMC as a trustee agency for project site plan review, as it is the SMMC who hold the natural resources of the Santa Monica Mountains in trust for the people of California, as established by the CA legislature through the Conservancy Act in 1979.
 - 3) We would also like to see the expansion of the Ordinance to include other threatened natural areas in LA, and in particular, the imperiled last remaining oak-walnut woodlands of Northeast LA, and the hillsides and canyons of the entire rim of the valley. If there is one criticism to be made regarding the Ordinance, it is that it does not include more of LA's important natural lands within its scope. While we know that the Ordinance was initiated by Councilmember Koretz, there are many more areas outside of Council District 5 that could and should fall under the same necessary regulations in order to preserve habitat and wildlife connectivity in our City, without going through a prolonged pilot phase.
 - 4) Lastly, we urge you to assign and hire adequate levels of trained staff that can ensure that the ordinance is 100% enforceable. While we appreciate the Planning Department's efforts to streamline the ordinance in the second draft, we hope that such simplification is not an indicator that there will be any lack of enforcement for ordinance infractions.

We thank you for all of your hard work, and if there is anything CFAC can do to help you advocate for this ordinance and for more funding related to hiring staff, please feel free to reach out.

Sincerely,



Shelley Billik
Chair, Community Forest Advisory Committee

CC: Vince Bertoni
Arthi Varma
Diana Kitching

Communication from Public

Name: Shelley Billik (CFAC Chair)
Date Submitted: 02/13/2023 08:45 PM
Council File No: 14-0518
Comments for Public Posting: Attached is the letter from the Community Forest Advisory Committee (CFAC) dated December 2, 2022.



December 2, 2022

REVISED LETTER

To: City Planning Commission

Re: [SUPPORT](#) for the revised Wildlife District Ordinance, CPC-2022-3413-CA, CPC-2022-3712-ZC, and ENV-2022-3414-CE.

We at CFAC strongly support the revised Wildlife District Ordinance, and request six amendments listed on the next page of this letter.

We are keenly aware of the loud and organized lobbying and misinformation campaign that has been peddled by the opposition who feel that the ordinance is “onerous.” And while we listen to the opinions of others, the goals of the Ordinance are far too important for ALL and too urgent to be stalled or diminished. **The past and ongoing destruction of native habitats that can never be replaced or restored has been very “onerous” to wildlife, biodiversity and the well-being of our entire city.** And it will continue with all of the projects already underway until the ordinance becomes effective. Furthermore, with the Federal directive and State goals of protecting 30% of open lands by 2030, as well as the scientific evidence that the threats to nature are upon us now, it is critical that everyone participates in protecting our ecosystems that provide PUBLIC benefits, even on private land. Living in a natural hillside community comes with a certain degree of responsibility and the WLD Ordinance presents reasonable restrictions in order to ensure that the natural life of the hillside endures into the future. It is the City’s responsibility and moral obligation to enact policies which strike a balance between personal gain and the greater good of Los Angeles, and the planet. **We feel that the Wildlife District Ordinance staff have done an excellent job of striking that balance, which for far too long has been favoring destructive development interests at the expense of natural resources, biodiversity, open space, and climate-resilience.** The current and continued threats of climate change and biodiversity loss show that we do not have the luxury of compromising when our last-remaining natural refuges and resources are at risk. We live in 1 of 36 global biological hotspots – equally rich in biodiversity and equally threatened. It is everyone’s duty to protect it.

The DCP staff report says it best: “Habitat connectivity between intact patches of habitat, and particularly with larger expanses of natural areas, plays a vital role for the maintenance of the wealth of species to allow natural ecological and evolutionary processes to continue. Habitat connectivity allows for greater wildlife movement, which is essential to wildlife survival for seeking food, shelter, or mates; dispersal of offspring to find new homes; or seasonal migration to find favorable conditions and/or breeding grounds. Movement is also essential for gene flow, for recolonizing unoccupied habitat after a local population goes extinct, and for species to adapt their geographic range (i.e., in response to a significant natural disaster, or global climate change). **The preservation of biodiversity within the City is important, not only for the intrinsic value of conserving the remaining natural resources and species that inhabited the area long before people altered the landscape, but also because maintaining the ecological health of these areas can provide ecosystem services that benefit people.** Open space areas near urban land uses function as a visual amenity, as a

passive recreational asset, a groundwater recharge site, and a 'storehouse' for natural species populations. The value of the ecosystem to daily life is found in the contributions toward soil erosion control, air pollution protection, crop and fruit production through pollination (via insects and birds), water quality purification, and other environmental stress reducers."

We support and commend the following elements of the Wildlife District Ordinance:

- We support and applaud the inclusion of **Significant Trees** of all species. There are many native and non-native species that provide critical food and habitat, yet have had no protections from destruction. And we heartily support the fact that tree removal is considered a project, which requires permits and review. For too long we have seen rampant destruction of trees as if they were simply outdoor furniture or an aesthetic feature that has little value.
- Closing the remedial grading loophole in the BHO by including it and setting a trigger for site plan review. Soils hold microorganisms and stored carbon and should be left undisturbed as much as possible.
- Including accessory structures, pools, sports courts, driveways and other hardscapes in lot coverage, in order to reduce impermeability and site disturbance.
- Including requirements for native landscaping, and
- Including requirements for native trees & shrubs

We ask the commission to include several amendments in order to make the WLD Ordinance more robust:

- 1) A proposed removal of 3 or more significant and/or protected trees to trigger a Site Plan Review.
- 2) Require 5 year maintenance/irrigation to accompany any tree planting, and ensure adequate planting space before approving removals (not more than one tree per planting hole).
- 3) On emergency removals require that LAFD must confer with UFD. The LAFD and their contractors don't have the background or expertise to assess tree health or pests.
- 4) Not to exempt R1 & R2 parcels from lot coverage. Small lots are often critical to habitat connectivity.
- 5) Revert to previous draft: exclude significant slopes from FAR calculations, especially since Ridgeline Protections were removed.
- 6) Revert to previous draft: development must be a minimum of 50 ft. from open space Resource Buffers, as 25 ft. is too narrow.

The Community Forest Advisory Committee (CFAC) was formed many years ago to improve the state of our City's urban forest by convening community representatives from the 15 council districts and a Mayor's representative. **We applaud the Planning Department team that has been working on this painstakingly** since the early efforts on Council File #14-0518 for Wildlife Corridors, through the first draft Wildlife Pilot Project, and now. We have been following this effort for more than 8 years! Please don't let the voices that are fueled by greed, fear and self-interest to slow this down. The time to pass this ordinance and begin implementation, with an eye towards expanding it to the rest of the city, is long overdue!

Respectfully,

Shelley

Cc: Conni Pallini-Tipton, et al