

August 22, 2022

Department of City Planning
City of Los Angeles
200 North Spring Street
Los Angeles, California 90012
(Via email: ourla2040@lacity.org, alexander.linz@lacity.org, lena.mik@lacity.org)

Re: Proposed Wildlife District Ordinance (CPC-2022-3413-CA and CPC-2022-3712-ZC)

To Those Concerned:

The Bel-Air Association is disappointed by the lack of City involvement or interest in the process of educating those impacted by the proposed Wildlife District Ordinance or answering the multitude of questions coming from worried stakeholders. Many hillside community groups, residents, and associations spent tremendous amounts of volunteer time educating and outreaching to our individual communities, doing our best to understand and communicate the City's complex Municipal Code and proposed amendments the Wildlife Ordinance would bring. Yet no City department seemed to take interest in attending or directly answering the many questions stemming from the proposed ordinance. This lack of departmental involvement meant those attempting to understand and disseminate the proposal were left unable to answer many of the questions from affected residents. This left residents to formulate their own interpretations, knowing their largest investment may hang in the balance.

The Planning Department held a single two hour virtual "workshop". The first hour was a general overview of the proposal, its history and intent. The second hour was the only opportunity for property owners and residents to ask questions in the hope the Department would pick their question to answer.

By comparison, the Bel-Air Beverly Crest Neighborhood Council held 16 community meetings to review the proposed ordinance and give a forum to those needing answers and clarity. The Planning Department was invited to each meeting, but declined every one. The Bel-Air Association participated in those meetings, and even held our own webinar, hoping to further review the proposal and give an opportunity to our members to reflect on the ordinance and express their positions. The Planning Department was invited, but declined as well. Several other community-based groups held meetings and forums to discuss the Wildlife Ordinance, yet we are told no involvement from the City occurred.

In short, the collective neighborhoods were left alone to figure-out the many technical provisions of this code change, the multitude of legal implications this ordinance would have, and the impact it might have on their property. To underscore this point, the litany of questions generated by the Neighborhood Council and its members were communicated to the City, yet remain unanswered.

Based on that single department lead workshop and the extremely limited education it provided, the City then held a Staff hearing where testimony could be given by the community. At that hearing there was zero opportunity for questions to be asked or confusion to be cleared up. For nearly 4 ½ hours the City took testimony from a community that had countless unanswered questions, limited understanding, and only one hour of direct City involvement.

Those impacted by this proposal should have their questions answered, and the Neighborhood Council agrees. Additional workshops and City outreach should occur. And no further hearings should take place until the Bel-Air Beverly Crest communities understand the proposed Wildlife District Ordinance, and it's impact. Once that outreach occurs and the community has had an opportunity to understand the full intent and impact of the ordinance, new staff hearings should be scheduled.

A Better Methodology:

One key topic discussed at the Bel-Air Beverly Crest Neighborhood Council meetings on the proposed ordinance was: Why not use a biologically based land cover methodology instead of a land use mechanism established through the general Zoning Code? A biologically based strategy would mean those areas with significant wildlife resources would be identified, and ONLY those surrounding areas with direct impact would be affected by provisions designed to impact the identified wildlife. This runs contrary to the current provision that simply takes the existing area designated "Hillside" and treats it all the same regardless of its impact or value to wildlife habitats.

This type of broad regulatory application has created tremendous opposition to the proposed ordinance. Like the Ridgeline Ordinance before, the wholesale application has many homeowners asking why they are included, despite living on a fully developed street, surrounded by other fully developed streets, and living nowhere near largescale open space. This is why a land cover methodology might make more sense and remove much of the consternation towards the proposed ordinance.

During the 4 ½ hour Staff hearing it was clear that environmental organizations and individuals from outside the proposed Wildlife District were supportive of the ordinance. However, few spoke to any provision or code section they liked/understood or specifically supported. And none of them would be directly impacted by the new law.

Bel-Air Association, 100 Bel Air Road, Los Angeles, CA 90077 Phone: 310-474-3527 Email: info@belairassociation.org Website: www.belairassociation.org However, what was also made clear during the staff hearing was those who were directly impacted were far more likely to be concerned with the proposal's ambiguity, lack of clear intent, or focused nature of the district boundaries.

The Ordinance / Unclear:

The proposed ordinance creates a tremendous amount of uncertainty for those hoping to perform even the most modest of upgrades to their properties. For example, "Wildlife Resources" are impactful, but not fully mapped. Yet the ordinance appears to suggest that an unmapped wildlife resource could be discovered and applied to a "project". If true, this provision has the potential to be used as a weapon by anyone looking to stifle an unliked yet legal "project". Claiming a previously unmapped wildlife resource exists on the property could easily be a way to impact specific properties or areas, while also signaling that future "projects" could be targeted as well.

Site Plan Review is supposed to be a mechanism used by the Planning Department to review specific aspects of a development to ensure it complies with or meets the standards of specific code provisions. However, the Wildlife Ordinance suggests using the Site Plan Review process to ensure several provisions are adhered too. Unfortunately, the Site Plan Review process is expensive, time consuming, and being used liberally within the proposed ordinance. In fact, some are suggesting further use of the planning process should be used. However, the fear is that a wave of new Site Plan Applications will be created, causing further burdening of City Departments and cost of compliance, while accomplishing little. Site Plan Review should be used to protect the surrounding community from developmental over-reach, and not a feel-good mechanism that is punitive to those who happen to qualify as having a "project".

What is also unclear in the proposed ordinance is the applicability of certain restrictions as it relates to the actions that qualify as a "project". For example, LADBS typically does not require permits for walls/fences around properties. Yet the proposed ordinance has an entire section devoted to wall/fence regulations. Also, are the window provisions only triggered when proposed additions or remodels decide to create or change existing windows, or is the change mandatory during a remodel that qualifies as a "project", regardless of intent to remove and replace existing windows? Lastly, when are the "landscaping and vegetation" provisions required? There are no permits typically needed for this work, and no "project" defining characteristics make it clear what would trigger them.

The ordinance also uses the term "grade" within the definition of "Wildlife Lot Coverage". It is important the Planning Department be deliberate in the use of grade, as the current definition of "lot coverage" intentionally uses the word "ground". The difference is, "ground" signifies the measurement of something from its top down to the dirt (ground). While "grade" denotes a possible imaginary line that floats above a structure, thereby disqualifying it from the definition "wildlife lot coverage". However,

Bel-Air Association, 100 Bel Air Road, Los Angeles, CA 90077 Phone: 310-474-3527 Email: info@belairassociation.org Website: www.belairassociation.org existing hillside language as it relates to Bonus provisions uses the term "natural grade", further signifying the importance of intentional use of ground vs. grade.

Concerns / Unintended Consequences.

The Wildlife District Ordinance has several requirements as it relates to new Fencing/Walls. It would appear clear the goal is to allow the movement of animals through established properties, but these requirements seem to run contrary to security concerns and policing goals. Mandated spacing within fences seem to negate the primary goal of having the fencing, which is for privacy and protection. Additionally, the option to have a further recessed side-yard fence/setback will become a liability if the abutting neighbor chooses the same fencing option along the same side-yard. This would mean two property owners have constructed two walls that are offset from their side-yard lot lines, thereby creating a six-foot-wide pathway to the rear of their respective properties. These unimproved pathways could easily be used for any number of nefarious activities, just as unimproved alleyways behind homes in the flats do.

The proposed ordinance places two additional restrictions as it relates to **height.** First it reduces the current height to 25 feet, using today's definition of hillside height. Additionally, the ordinance uses the previous method of measuring "hillside height" to place a secondary over-all height limit of 35 feet. This new restriction goes too far and does not take into consideration steeper sloped properties. The City should maintain the current height standards per section 12.21.C.10, and include the previous height standard and allowance of 45 feet. This would accomplish the goal of preventing developments from "snaking" down the hillside, while accommodating homes located on steep hillsides.

With the proposed inclusion of basement square footage, reduction in heights, and further limiting of lot coverage, removing the **RFA** for 60%+ slopes appear punitive and unnecessary. There are many properties that consist of steep hillsides that are significantly reduced in potential size and square footage by today's code. This provision would effectively render many of these properties either functionally unbuildable or non-conforming. Additionally, the department should conduct test-case analysis on the "Wildlife Lot Coverage" provision. Properties that are smaller in size will likely be disproportionately affected by this provision.

Lastly, the "Vegetation and Landscaping" provisions appear to be cumbersome and overly specific. The ordinance should propose general parameters for the homeowner to follow. Instead, the ordinance establishes "areas" and "zones" that all but guarantee the need for an arborist and landscaping professionals. This adds yet another layer in the cost and time to complete a "project". Additionally, it is unclear the role Building & Safety would have in the inspection and enforcement of these regulations. Is it the intent of this ordinance for Los Angeles Building & Safety Inspectors to evaluate plant species, canopy width, and root systems of significant trees? Or will this fall to the Department of Urban Forestry?

Bel-Air Association, 100 Bel Air Road, Los Angeles, CA 90077 Phone: 310-474-3527 Email: info@belairassociation.org Website: www.belairassociation.org

Moving Forward

Protecting our natural surroundings is a noble and needed effort for Los Angeles Hillsides. There is no perfect manner in which to pursue those efforts, but glaring opportunities exist that appear to have been omitted. Protecting existing habitats with targeted regulations is a straight-forward way to effectively accomplish the goal of protecting wildlife mobility, while removing much of the public opposition.

Blanket restrictions across large swaths of hillside, regardless of its biodiversity or wildlife habitat significance is the incorrect methodology, which is why we support the Bel-Air Beverly Crest Neighborhood Council in seeking a land cover methodology.

The continued addition of regulatory steps, need for professional assistance, and cost of procedural hurdles continue to exacerbate the cost and time expended to complete a project, thereby disincentivizing homeowners from conducting meaningful and needed upgrades to their homes, including safety upgrades.

Included in this letter are communications the Association has received regarding the proposed Wildlife District Ordinance. We submit them as well to ensure they reach your attention.

Bel-Air is a community that is enhanced by the wildlife that call it home. We must protect wildlife while also protecting the single largest investment nearly all of us have...our homes.

Thank You,

Jamie Meyer President

Bel-Air Association

Jamue Meyer

Shawn Bayliss
Executive Director

Bel-Air Association

Cc:

Vince Bertoni Vince.Bertoni@lacity.org
Kevin Keller Kevin.Keller@LAcity.org
Paul Koretz Paul.Koretz@LAcity.org

Lena Mik Lena.Mik@LAcity.org

Planning Commission CPC@LAcity.org

Nithya Raman Nithya.Raman@LAcity.org

Nury Martinez Nury.Martinez@lacity.org

Dear City Councilmembers and City Planning Department,

I am a resident and affected homeowner to the proposed Wildlife Ordinance #CPC-2022-3413-CA, CPC-2022-3712-ZC. The affected residents have not been properly notified and I am strongly opposed to the Wildlife Ordinance. I ask that the City change the terrible restrictions having nothing to do with wildlife including height limits, and delay implementation of any changes to our current building standards and zoning.

Sincerely,

Shirin Javid

SUBJECT: I oppose the proposed Wildlife Ordinance, #CPC-2022-3413-CA, CPC-2022-3712-ZC.

RESIDENT NAME: Cynthia Grant

RESIDENT ADDRESS: 1650 Bel Air Rd., Los Angeles, CA. 90077

Dear City Council Members and City Planning Department,

I am a registered voter and a resident of the area affected by the proposed new Wildlife Ordinance #CPC-2022-3413-CA, CPC-2022-3712-ZC. I am strongly opposed to the proposed Wildlife Ordinance (WO) as it would apply to the residents of the proposed "WLD" district and to my home. I ask that the City abandon and/or delay implementation of any changes to our current building standards and zoning. Further, it is deceitful, misleading, and disingenuous for the City to wrap this radical downzoning initiative in an ordinance both titled and promoted as being for "wildlife", when in fact, there have been no studies in this area to prove such a claim, and many of the regulations have little or no benefit to wildlife.

The one-size-fits-all approach inherent in the WO is wrong-headed. Unlike other areas of Los Angeles and Ventura County, the proposed "WLD" district is heavily urbanized, with major traffic corridors, residential neighborhoods, lighted traffic intersections, commercial retail, schools, country clubs, religious institutions, and bordered by MAJOR freeways.

The WO fails to take into account that these heavily urbanized hills are fundamentally different from less urbanized areas in Los Angeles and Ventura County. The WO is also more restrictive than the wildlife habitat related ordinances in Los Angeles County and Ventura County.

I oppose the WO on the following additional grounds:

• The City has failed to take measures to properly inform the affected residents. Thus, the proposed regulations deny us our due process and equal protection rights.

- The proposed regulations as applied to the residents are ad hoc takings, and constitute unreasonable limitations on the use and value of the land.
- The lack of transparency and deceptive tactics on the part of the City of Los Angeles' Planning Department and City Officials in presenting the Wildlife Ordinance to the public and affected homeowners and residents.
- The regulations constitute confiscatory government conduct in violation of our due process rights.
- The regulations contain unduly burdensome permitting procedures and costly new fees that result in no public benefit.
- These regulations reduce the usability of our property without compensation or public benefit.
- We reserve all other grounds for opposition.

I overwhelmingly oppose the WO because the City has provided no evidence of environmental benefit, imposes onerous permitting requirements, unnecessary and exorbitantly expensive fees, puts our families, pets, children at risk (both from criminals and wild animals), and diminishes our property value.

Here are some of my concerns and some of the deficiencies in the planning process and proposed regulations:

- The City generated inadequate maps and includes Resources that no longer exist.
- The adoption of the WO has been fast-tracked and does not provide adequate time for public review and comment and substantive draft modifications. Residents were only notified about the ordinance three weeks ago, during the 4th of July Holiday/Summer travel season.
- · Although the city is seeking exemption from CEQA, site specific studies would provide critical and relevant information, and therefore should be completed prior to adopting the ordinance. Wildlife, natural habitats, and residents are at risk without these studies.
- The WO has many Ill-conceived requirements that will likely backfire on wildlife, natural habitat, and residents. For example:
- o The WO does not distinguish between developed and undeveloped Ridgelines. It reduces the height of existing properties on developed Ridgelines from 36ft to 25ft yet incentivizes them to excavate the hillside to gain the additional 10ft allowed in the overall structure height.
- o The Open Space Resource Buffer will incentivize property owners to keep vacant land away from conservation groups.

- o The onerous permitting process will encourage homeowners to sell to developers because they are the only ones with the patience, time, or expertise to navigate the process.
- The WO will diminish real estate values in the proposed "WLD" district. Prospective buyers will be intimidated by title constraints imposed by the ordinance, uncertainty and excessive permitting costs related to improvements and realtor disclosures which will create ambiguity and threaten sales.
- The vast majority of public residential streets are completely built out and already have their own protective measures in place. These include Hillside Regulations (BHO & HCR), Very High Fire Severity Zone, Mulholland Specific Plan, Hollywood Community Specific Plan: Slope Density, and existing Zoning.

I recognize there is always room for improvement, but without proper studies to address concerns of disease spreading through animals, crime/safety impacts to residents, fire safety, protection of small children and pets, and loss of property value, I cannot support this ordinance.

I reserve the right to add to or amend this objection later. Respectfully, Cynthia Grant 1650 Bel Air Rd., Los Angeles, CA90077

On my own behalf, and for the benefit of all ridge property owners, including my properties in Bel Air including the home at 1461 Bel Air Road, I am strongly opposed to the proposed "Wildlife" Ordinance, as written, for the reasons outlined in the attached document, including my personal comments in bold at the end of the document as follows:

While I reserve the right to add to, or amend, this objection at a later date, I also have the following personal objections and concerns:

- The proposed Ordinance should not have any blanket restrictions, but each property should be considered on its own merit since no two properties have the same elements.
- 2. Properties with contiguous neighbors should not be treated any differently than the contiguous neighbors. For example, I have a 2,000-sf home that is on a ridge and between 2 neighbors with 2 recently constructed 10,000-sf homes on comparable lots. What sense does it make to restrict the development of my property when there will be ZERO impact to wildlife/aesthetics, etc. whether I build a 10,000-sf house or not.
- 3. The proposed Ordinance fails to recognize that wildlife/aesthetic matters are the burden of all of society not just the unlucky owners of ridge properties. If society wants to place unique burdens on ridge/hillside owners, then society, not unlucky

homeowners should bear the burden of such restrictions by payment of condemnation proceeds, etc.

4. I fail to understand why the City or any reasonable person would prefer development restrictions on ridge or hillside properties that would encourage natural weeds/scrubs and other fire inducing and non-aesthetic hillsides over developed/manicured houses/landscaping that are far more fire resistant. I mean, while I agree protection of wildlife is noble, it is far less noble than protecting the community from fires, which is the greatest threat to our hillside homes.

For the welfare of the community and fairness to owners of properties within the Wildlife jurisdiction, I urge a NO vote on the Ordinance, as written.

Very Truly Yours,

Jeffrey A. Kaplan
Attorney at Law (inactive)
10877 Wilshire Blvd., Suite 1520
Los Angeles, CA 90024-4341
Tel. (310) 208-0075 x 109
Fax (310) 208-0571

As a registered voter and a resident of the area affected by the proposed new Wildlife Ordinance #CPC-2022-3413-CA, CPC-2022-3712-ZC, I am strongly opposed to the proposed Wildlife Ordinance (WO) as it would apply to the residents of the proposed "WLD" district and to my home. I, Pat, have attended all the Bel Air Beverly Crest Neighborhood's Ad Hoc Subcommittee on the Proposed Wildlife Ordinance meetings in May, June and July as a guest so I have spent time learning about this ordinance. Both of us are also environmentalists.

I am strongly opposed to the proposed Wildlife Ordinance for many reasons, including specifically:

1. The City has not provided strong environmental science to support all the restrictions, not even to the Bel Air Beverly Crest Neighborhood Council who has requested it. It should provide all the environmental science—supportive, unsupportive—before the City moves its process forward. Grounding the Ordinance in science, not aesthetics, might help the homeowners understand the proposed Ordinance and remove the more punitive restrictions to long-term homeowners who have smaller homes, ridgeline homes and don't live in a mansion. We recommend the Bel Air Association request this science and compare it to the Ordinance.

For example, the environmental scientist at the 7/12 Bel Air Beverly Crest Neighborhood Council's Planning and Development Committee said the animals don't care about the ridgelines—they go wherever they can pass and are insensitive to ridgelines. A City employee mentioned at the 7/13/22 meeting that the height restrictions were for aesthetics reasons. This is not an aesthetics ordinance; it is a Wildlife Ordinance. Aesthetics is not stated in the purpose of the Wildlife Ordinance so anything related to aesthetics like the 25' envelop height, no RFA for slopes greater than 60°, etc. should be removed. On the other hand, the same environmental scientist said panning windows would help the birds from dying. Follow the science, not what the average environmentalist think the animals want.

- 2. The envelope height should be removed and use the total height to restrict the number of stairstep levels on the ridgeline. We object to the 25' envelope height restriction because my house's footprint on a steep slope will most likely not allow me to build two stories under this proposed Ordinance (three professionals familiar with the Ordinance have told me this—two publicly). Use the total height restriction from top to bottom to remove levels in stairstep houses—the City doesn't need the additional envelope height to restrict levels. At the last meeting, a City representative said the ridgeline height restrictions are based on aesthetics. The envelope-height restriction won't allow homeowners on a steep slope to rebuild a two-story house because our house's footprints are on an already-developed steep slope. Very few knowledgeable people in this field understand the envelope-height restriction based on my attendance at various meetings and brush over it. The envelope height should be removed and use the total height to restrict the number of levels.
- 3. The City needs to explicitly state that homeowners are entitled to the Guaranteed Minimum Residential Floor Area per Table 12.21 C.10-3 of the Baseline Hillside Ordinance. A City representative said this would still apply in the last 7/13 public meeting. Without this explicit written statement in the proposed Ordinance, the Ordinance can be easily interpreted to not allow a homeowner to build using the RFA from the BHO. The Wildlife Ordinance says it will take precedent over all other ordinances.
- 4. We object to the RFA for > 60° slope bands to 0 RFA; please use the current BHO. The proposed Wildlife Ordinance would allow me to rebuild only about ¼ of my current small house RFA (the size of a 1-bedroom or small 2-bedroom apartment) because of the >60° slopes counting as 0 RFA and my house is on a steep slope. I respectfully request that the greater than 60-degree slope keep its current RFA allocation. The City needs to provide overwhelming environmental science to reduce my current small house that will be dropped to ¼ of its size if the current draft Ordinance is enacted.
- 5. Create less strict requirements for already-developed properties than undeveloped land, particularly on ridgelines and wildlife buffers. It should also use Santa Monica Mountains Conservancy habitat lands for determining wildlife buffers, not creek beds that have not had any water for 75 years. The Ordinance also seems to allow a house to suddenly become

- a wildlife buffer—this is a concern for homeowners that their property value and ability to rebuild can suddenly be reduced further than this Ordinance already allows.
- 6. The City must provide overwhelmingly strong evidence that the environmental science backs up all the restrictions in the proposed Wildlife Ordinance, particularly about the restrictions on the ridgelines. The Bel Air Beverly Crest Neighborhood Council Ad Hoc Subcommittee on Proposed Wildlife District has requested this from the City and has not yet received the information. Please show all the environmental science (supportive and nonsupportive) rather than only the supportive science to the residents. You may persuade or at least give homeowners an understanding for significantly reducing our property values and rights and creating cost and hardship.
- 7. Most knowledgeable people acknowledge that the existing regulation about rebuilding a house due to a natural disaster with the fewer restrictions, provided the City's cost is <75% will not happen under the proposed Wildlife Ordinance with all the new restrictions during the required 2 years to obtain a permit and the City's increased workload. No one who is knowledgeable can explain the City's calculated cost system but believe a hot wildfire will cost >75%.
- 8. This Ordinance will yield unintended consequences that harm the successful professionals who moved into this area and cannot afford to rebuild, given the cost of experts and extended time periods for getting permits due to reviews and City workload. It creates security and fire concerns. We had hoped for a peaceful retirement, but the City is creating hardship, fear, a lot of work and cost for us and significantly reducing our property value. We are not the big, bad developers. We are long-term residents in a smaller, older home—the Ordinance impacts homeowners like us more. The homeowners' rights should be balanced with the City's desire to restrict developed properties for environmental science that the City has yet to communicate for each restriction in the proposed Wildlife Ordinance.

I ask that the City abandon and/or delay implementation of any changes to our current building standards and zoning. Further, it is misleading and disingenuous for the City to wrap this radical downzoning initiative in an ordinance both titled and promoted as being for "wildlife," when in fact, there have been no studies in this area to prove such a claim, and many of the regulations have little or no benefit to wildlife.

The one-size-fits-all approach inherent in the WO is wrong-headed. Unlike other areas of Los Angeles and Ventura County, the proposed "WLD" district is heavily urbanized, with major traffic corridors, residential neighborhoods, lighted traffic intersections, commercial retail, schools, country clubs, religious institutions, and bordered by MAJOR freeways.

The WO fails to take into account that these heavily urbanized hills are fundamentally different from less urbanized areas in Los Angeles and Ventura County. The WO is also more restrictive than the wildlife habitat related ordinances in Los Angeles County and Ventura County.

I oppose the WO on the following additional grounds:

- The City has failed to take measures to properly inform the affected residents. Thus, the proposed regulations deny us our due process and equal protection rights.
- The proposed regulations as applied to the residents are ad hoc takings, and constitute unreasonable limitations on the use and value of the land.
- The lack of transparency and deceptive tactics on the part of the City of Los Angeles' Planning Department and City Officials in presenting the Wildlife Ordinance to the public and affected homeowners and residents.
- The regulations constitute confiscatory government conduct in violation of our due process rights.
- The regulations contain unduly burdensome permitting procedures and costly new fees that result in no public benefit.
- These regulations reduce the usability of our property without compensation or public benefit.
- We reserve all other grounds for opposition.

I overwhelmingly oppose the WO because the City has provided no evidence of environmental benefit, imposes onerous permitting requirements, unnecessary and exorbitantly expensive fees, puts our families, pets, children at risk (both from criminals and wild animals), and diminishes our property value.

Here are some of my concerns and some of the deficiencies in the planning process and proposed regulations:

- The City generated inadequate maps and includes Resources that no longer exist.
- The adoption of the WO has been fast-tracked and does not provide adequate time for public review and comment and substantive draft modifications. Residents were only notified about the ordinance three weeks ago, during the 4th of July Holiday/Summer travel season.
- Although the city is seeking exemption from CEQA, site specific studies would provide
 critical and relevant information, and therefore should be completed prior to adopting the
 ordinance. Wildlife, natural habitats, and residents are at risk without these studies.
- The WO has many Ill-conceived requirements that will likely backfire on wildlife, natural habitat, and residents. For example:
 - The WO does not distinguish between developed and undeveloped Ridgelines. It reduces the height of existing properties on developed Ridgelines from 36ft to 25ft, yet incentivizes them to excavate the hillside to gain the additional 10ft allowed in the overall structure height.
 - The Open Space Resource Buffer will incentivize property owners to keep vacant land away from conservation groups.

- The onerous permitting process will encourage homeowners to sell to developers because they are the only ones with the patience, time or expertise to navigate the process.
- The WO will diminish real estate values in the proposed "WLD" district. Prospective buyers
 will be intimidated by title constraints imposed by the ordinance, uncertainty and excessive
 permitting costs related to improvements and realtor disclosures which will create
 ambiguity and threaten sales.
- The vast majority of public residential streets are completely built out and already have their own protective measures in place. These include Hillside Regulations (BHO & HCR), Very High Fire Severity Zone, Mulholland Specific Plan, Hollywood Community Specific Plan: Slope Density, and existing Zoning.

I recognize there is always room for improvement, but without proper studies to address concerns of disease spreading through animals, crime/safety impacts to residents, fire safety, protection of small children and pets, and loss of property value, I cannot support this ordinance.

I reserve the right to add to or amend this objection at a later date.

Sincerely,

Patricia K. Zingheim and Jay R. Schuster 1541 Bel Air Road, Los Angeles, 90077 310-770-7105 cell 310-471-4865 landline sz@schuster-zingheim.com

Dear City Councilmembers and City Planning Department,

I am a registered voter and I own several homes in the Bel Air area affected by the proposed new Wildlife Ordinance #CPC-2022-3413-CA, CPC-2022-3712-ZC. I am strongly opposed to the proposed Wildlife Ordinance (WO).

I ask that the City abandon and/or delay implementation of any changes to our current building standards and zoning. Further, it is deceitful, misleading, and disingenuous for the City to wrap this radical downzoning initiative in an ordinance both titled and promoted as being for "wildlife", when in fact, there have been no studies in this area to prove such a claim, and many of the regulations have little or no benefit to wildlife.

The one-size-fits-all approach inherent in the WO is wrong-headed. Unlike other areas of Los Angeles and Ventura County, the proposed "WLD" district is heavily urbanized, with major traffic corridors, residential neighborhoods, lighted traffic intersections, commercial retail, schools, country clubs, religious institutions, and bordered by MAJOR freeways.

The WO fails to take into account that these heavily urbanized hills are fundamentally different from less urbanized areas in Los Angeles and Ventura County. The WO is also more restrictive than the wildlife habitat related ordinances in Los Angeles County and Ventura County. I oppose the WO on the following additional grounds:

- The City has failed to take measures to properly inform the affected residents. Thus, the proposed regulations deny us our due process and equal protection rights.
- The proposed regulations as applied to the residents are ad hoc takings, and constitute unreasonable limitations on the use and value of the land.
- The lack of transparency and deceptive tactics on the part of the City of Los Angeles' Planning Department and City Officials in presenting the Wildlife Ordinance to the public and affected homeowners and residents.
- The regulations constitute confiscatory government conduct in violation of our due process rights.
- The regulations contain unduly burdensome permitting procedures and costly new fees that result in no public benefit.
- These regulations reduce the usability of our property without compensation or public benefit.
- We reserve all other grounds for opposition.

I overwhelmingly oppose the WO because the City has provided no evidence of environmental benefit, imposes onerous permitting requirements, unnecessary and exorbitantly expensive fees, puts our families, pets, children at risk (both from criminals and wild animals), and diminishes our property value.

Here are some of my concerns and some of the deficiencies in the planning process and proposed regulations:

- \cdot $\;$ The City generated inadequate maps and includes Resources that no longer exist.
- The adoption of the WO has been fast-tracked and does not provide adequate time for public review and comment and substantive draft modifications. Residents were only notified about the ordinance three weeks ago, during the 4th of July Holiday/Summer travel season.
- · Although the city is seeking exemption from CEQA, site specific studies would provide critical and relevant information, and therefore should be completed prior to adopting the ordinance. Wildlife, natural habitats, and residents are at risk without these studies.
- The WO has many Ill-conceived requirements that will likely backfire on wildlife, natural habitat, and residents. For example:
 - o The WO does not distinguish between developed and undeveloped Ridgelines. It reduces the height of existing properties on developed Ridgelines from 36ft to 25ft, yet incentivizes them to excavate the hillside to gain the additional 10ft allowed in the overall structure height.
 - o The Open Space Resource Buffer will incentivize property owners to keep vacant land away from conservation groups.

- o The onerous permitting process will encourage homeowners to sell to developers because they are the only ones with the patience, time or expertise to navigate the process.
- The WO will diminish real estate values in the proposed "WLD" district. Prospective buyers will be intimidated by title constraints imposed by the ordinance, uncertainty and excessive permitting costs related to improvements and realtor disclosures which will create ambiguity and threaten sales.
- The vast majority of public residential streets are completely built out and already have their own protective measures in place. These include Hillside Regulations (BHO & HCR), Very High Fire Severity Zone, Mulholland Specific Plan, Hollywood Community Specific Plan: Slope Density, and existing Zoning.

I recognize there is always room for improvement, but without proper studies to address concerns of disease spreading through animals, crime/safety impacts to residents, fire safety, protection of small children and pets, and loss of property value, I cannot support this ordinance.

I reserve the right to add to or amend this objection at a later date.

Respectfully,

Jeffrey A. Kaplan
Attorney at Law (inactive)
10877 Wilshire Blvd., Suite 1520
Los Angeles, CA 90024-4341
Tel. (310) 208-0075 x 109
Fax (310) 208-0571

I just wanted to lend some perspective to the wildlife situation, which goes to the very core of the need, or rather lack of it, for an ordinance to protect wildlife in Bel Air.

I grew up in this neighborhood and over the 60 plus years here, now back permanently, understand better than the average resident what's going on here.

There is absolutely no need for wildlife protection or corridors!

Back in the 1970s, they allowed bow hunting in Bel Air. Hunters kept the deer population from proliferating. Fewer deer, fewer coyotes. There were stories of mountain lions out in the hills towards Malibu but that's it. Stories. I'm sure they were true but there was no significant impact on the surrounding communities due to their existence.

Now, I see so much wildlife in these hills it's a little hard to fathom how much change has occured. I hike on the Casiano Fireroad frequently and even during the daytime, you see coyotes running around, even up and down the street. Wildlife is so prevalent in comparison. In the past, you hardly ever saw a deer or coyote, if you did, they ran in panic. Now, they compete for space and are vastly more emboldened and aggressive. That's a product of having TOO much wildlife.

Here's a more important facet of the proposed ordinance:

I'm not sure what the current ordinance says but the previous one essentially amounted to property confiscation. We're not Communists or Marxists and private property still exists. Make no mistake about it, this isn't about protecting wildlife, it's about moving us from a peace-loving free America to a top-down, ruling class government that will take away, if we let them, every last vestige of our property rights. That should scare you to the core, because it certainly is a frightening prospect.

Sincerely,		
Fred		
Casiano Road		

Dear City Planning:

Why can't you leave good enough alone

It is nonsensical that after permitting mega mansions in the \$100 to \$500 million price range you want to create a wildlife zone to protect the wildlife that already exists here!

You should be protecting your constituents. This is a great disservice to the people who live here and have lived here for decades.

You can't turn back time by taking away rights and expectations that have become the norm in our neighborhoods and add on additional restrictions on our future plans as yet unfulfilled.

This is not a wildlife preserve and the wildlife that still lives here has reached an equilibrium state without any regulations.

This idea should have been implemented at the time Bel Air subdivision plans were submitted not now.

You can't and you shouldn't continuously change the rules on us.

Paul Mir Resident of Bel Air Rd since 1989