

Communication from Public

Name: Lisa Hart

Date Submitted: 12/13/2022 11:05 AM

Council File No: 14-0518

Comments for Public Posting: Dear City Planning Commissioners and city leadership: The representatives to the Neighborhood Council Sustainability Alliance voted without opposition to express our concerns about the significant weakening of the proposed wildlife ordinance. Many of the proposed changes were offered without a provided rationale, and seem arbitrary. We do not understand on what basis City Planning tried to balance the goals of wildlife and biodiversity with the concerns of some property owners (which often seem short-sighted). We appreciate that the challenge has been difficult, and that this is a work in progress that can evolve as our knowledge grows. However, the value of a pilot project such as this rests in taking aggressive actions that can then be studied and adapted for a larger policy. The recent revisions do not seem consistent with this approach. Based on our current (and evolving) understanding of the revised draft ordinance, our largest concerns and suggestions are listed below. Lot size We think that by excluding all R1 and R2 lots from lot coverage standards, City Planning has done more than address the concerns about smaller lots, so exemptions based on smaller lots rather than all R1 or R2 would seem to make more sense. Fencing Permeable fencing strikes us as one of the easiest and most important ways to ensure connectivity so that wildlife can travel. We understand that security is a concern of some property owners, but we think this version is too drastic. Perhaps applying the permeable fencing requirement to undeveloped lots would help (although this is obviously not a long-term solution), or limiting impermeable fencing to only the front (which we understand to be the primary concern of some property owners). We like the Bel Air-Beverly Crest Neighborhood Council's recommendation that on lots greater than ½ an acre (if undeveloped or with a demolished house), perimeter fencing must be permeable to allow wildlife to pass through. Interior fencing may be impermeable. Ridgeline protections We are very concerned about the removal of the ridgeline setbacks. We understand that they met with resistance from some property owners, but we would like to remind you that City Planning was asked by city council to develop a ridgeline protection ordinance, which we now do not have. Site plan review process We are concerned about the reliance on the site plan review process, since we do not understand it very well.

Additionally, we agree with the Bel Air-Beverly Crest Neighborhood Council's observation that none of the triggers for a site plan review are habitat-driven and that this can be corrected with the following "habitat triggers" for site plan review on undeveloped lots in addition to those that were proposed: ? presence of woodland resources ? presence of habitat for protected species ? placement of lot in a mapped habitat block ? proposed removal of 3 or more protected or significant trees Woodlands as a wildlife resource Lastly, we recommend that woodlands be considered as a wildlife resource, in part because we are unclear about how the site plan review process will work. Thank you, Lisa Hart Board Member



November 14, 2022

Dear City Planning Commissioners and city leadership:

The representatives to the Neighborhood Council Sustainability Alliance voted without opposition to express our concerns about the significant weakening of the proposed wildlife ordinance.

Many of the proposed changes were offered without a provided rationale, and seem arbitrary. We do not understand on what basis City Planning tried to balance the goals of wildlife and biodiversity with the concerns of some property owners (which often seem short-sighted). We appreciate that the challenge has been difficult, and that this is a work in progress that can evolve as our knowledge grows. However, the value of a pilot project such as this rests in taking aggressive actions that can then be studied and adapted for a larger policy. The recent revisions do not seem consistent with this approach. Based on our current (and evolving) understanding of the revised draft ordinance, our largest concerns and suggestions are listed below.

Lot size

We think that by excluding all R1 and R2 lots from lot coverage standards, City Planning has done more than address the concerns about smaller lots, so exemptions based on smaller lots rather than all R1 or R2 would seem to make more sense.

Fencing

Permeable fencing strikes us as one of the easiest and most important ways to ensure connectivity so that wildlife can travel. We understand that security is a concern of some property owners, but we think this version is too drastic. Perhaps applying the permeable fencing requirement to undeveloped lots would help (although this is obviously not a long-term solution), or limiting impermeable fencing to only the front (which we understand to be the primary concern of some property owners). We like the Bel Air-Beverly Crest Neighborhood Council's recommendation that on lots greater than ½ an acre (if undeveloped or with a demolished house), perimeter fencing must be permeable to allow wildlife to pass through. Interior fencing may be impermeable.

Ridgeline protections

We are very concerned about the removal of the ridgeline setbacks. We understand that they met with resistance from some property owners, but we would like to remind you that City Planning was asked by city council to develop a ridgeline protection ordinance, which we now do not have.

Site plan review process

We are concerned about the reliance on the site plan review process, since we do not understand it very well.

Additionally, we agree with the Bel Air-Beverly Crest Neighborhood Council's observation that none of the triggers for a site plan review are habitat-driven and that this can be corrected with the following "habitat triggers" for site plan review on undeveloped lots in addition to those that were proposed:

- presence of woodland resources
- presence of habitat for protected species
- placement of lot in a mapped habitat block
- proposed removal of 3 or more protected or significant trees

Woodlands as a wildlife resource

Lastly, we recommend that woodlands be considered as a wildlife resource, in part because we are unclear about how the site plan review process will work.

Thank you,

A handwritten signature in black ink that reads "Lisa Hart". The signature is written in a cursive, flowing style.

Lisa Hart
Board Member