



clerk CIS <clerk.cis@lacity.org>

Community Impact Statement - Submission Details

LA City SNow <cityoflaprod@service-now.com>
Reply-To: LA City SNow <cityoflaprod@service-now.com>
To: Clerk.CIS@lacity.org

Wed, Jun 21, 2023 at 9:36 AM

A Neighborhood Council Community Impact Statement (CIS) has been successfully submitted to your Commission or City Council. We provided information below about CISs and attached a copy of the CIS.

We encourage you to reach out to the Community Impact Statement Filer to acknowledge receipt and if this Community Impact Statement will be scheduled at a future meeting. Neighborhood Council board members are volunteers and it would be helpful if they received confirmation that you received their CIS.

The CIS process was enabled by the Los Angeles Administrative Code §Section 22.819. It provides that, "a Neighborhood Council may take a formal position on a matter by way of a Community Impact Statement (CIS) or written resolution." NCs representatives also testify before City Boards and Commissions on the item related to their CIS. If the Neighborhood Council chooses to do so, the Neighborhood Council representative must provide the Commission with a copy of the CIS or resolution sufficiently in advance for review, possible inclusion on the agenda, and posting on the Commission's website. Any information you can provide related to your agenda setting schedule is helpful to share with the NC.

If the CIS or resolution pertains to a matter *listed on the Commission's agenda*, during the time the matter is heard, the designated Neighborhood Council representative should be given an opportunity to present the Neighborhood Council's formal position. We encourage becoming familiar with the City Council's rules on the subject. At the Chair's discretion, the Neighborhood Council representative may be asked to have a seat at the table (or equivalent for a virtual meeting) typically reserved for City staff and may provide the Neighborhood Council representative more time than allotted to members of the general public. They are also permitted up to five (5) minutes of time to address the legislative body. If the CIS or resolution pertains to a matter *not listed on the agenda*, the designated Neighborhood Council representative may speak during General Public Comments.

We share this information to assist you with the docketing neighborhood council items before your board/commission. If you have questions and/or concerns, please contact the Department of Neighborhood Empowerment at empowerla@lacity.org.

***** This is an automated response, please DO NOT reply to this email. *****

Contact Information

Neighborhood Council: Silver Lake

Name: Kevin Rutkowski

Email: kevin.rutkowski.slnc@gmail.com

The Board approved this CIS by a vote of: Yea(14) Nay(0) Abstain(1) Ineligible(0) Recusal(0)

Date of NC Board Action: 01/04/2023

Type of NC Board Action: For if Amended

Impact Information

Date: 06/21/2023

Update to a Previous Input: No

Directed To: City Council and Committees

Council File Number: 14-0518

Agenda Date:

Item Number:

Summary: The Silver Lake Neighborhood Council supports the recommendations from the Center of Biological Diversity, and will support the Wildlife Ordinance if amended.

Ref:MSG8530239



CIS Wildlife Ordinance.pdf
898K



Serving the Silver Lake Community Since 2003

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Vice Chair Daniel Weidlein
Treasurer Maebe A. Girl
Secretary Kevin Rutowski

COMMUNITY IMPACT STATEMENT

[Support if Amended] of Wildlife Ordinance
(Case Numbers CPC-2022-3413-CA, CPC-2022-3712-ZC, and ENV-2022-3414-CE)

Los Angeles City Planning Commission
City of Los Angeles
200 N Spring Street
Los Angeles CA, 90012

cpc@lacity.org
ourla2040@lacity.org
contactCD4@lacity.org
councilmember.soto-martinez@lacity.org

Dear LA City Planning Commission and Council Members:

The Silver Lake Neighborhood Council supports the recommendations from the Center for Biological Diversity, and will support the Wildlife Ordinance if amended. Please find enclosed the letter with the details of the requested amendments.

Sincerely,

A handwritten signature in black ink, appearing to read "Kevin Rutowski".

The Silver Lake Neighborhood Council
c/o Kevin Rutowski, Secretary

PRESENTED BY: Green Committee - Kristen Egermeier CoChair

SECONDED BY: Maebe A. Girl

YES: 14, NO: 0, ABSTAIN: 1

ON THIS DATE: January 4th, 2023



November 14, 2022

Re: Item #9 (Wildlife District Ordinance; case numbers CPC-2022-3413-CA, CPC-2022-3712-ZC, ENV-2022-3414-CE) -- **Support if Amended**

Los Angeles City Planning Commission
City of Los Angeles
200 N. Spring Street
Los Angeles, California 90012
cpc@lacity.org
ourla2040@lacity.org

Dear Los Angeles City Planning Commission:

A strong wildlife ordinance is a critical step in protecting the City's biodiversity and open space for both people and wildlife. In July 2022, many of the undersigned organizations urged you to adopt the [April 2022 Revised Draft Wildlife Ordinance](#) (the "April 2022 Draft") and consider inclusion of the amendments outlined in [this letter](#) submitted to the City Planning Department on August 9, 2021 (the "August 2021 Letter"). Unfortunately, the October 2022 Draft Wildlife Ordinance ("October 2022 Draft") removes many of the protections included in the April 2022 Draft, and does not incorporate the amendments outlined in the August 9, 2021 letter. **We strongly urge inclusion of the amendments proposed below, which are necessary for our support of the Wildlife Ordinance.**

I. Amendments for the Wildlife Ordinance

In order to offer our support for the Wildlife District Ordinance, we urge inclusion of the following two revisions. These two revisions would significantly expand the universe of properties for which the Site Plan Review process applies and strengthen the Site Plan Review process to ensure that it is a meaningful process to ensure consideration of wildlife connectivity.

First, the Site Plan Review process must be expanded to encompass projects that meet any of the following thresholds:

- *Any Project that creates or results in 3,000 square feet or more of Residential Floor Area ("RFA").* The October 2022 Draft establishes a threshold of 7,500 square feet or more of RFA for Site Plan Review to be required (See Page 19). This would likely exempt many extremely large homes (e.g., 7,000+ square feet) from Site Plan Review despite potentially significant impacts on wildlife and wildlife habitat. The approval of more massive homes ranging from 4,000-7,000+ square feet with no Site Plan Review

appears antithetical to the purpose of the ordinance and will not ensure protection of the sensitive resources or wildlife connectivity in the District.

- Any Project that results in the removal or destruction of a total of three or more “Significant Trees” or “Protected Trees or Shrubs” as those terms are defined in the October 2022 Draft (See page 9.). As currently written, some projects that destroy multiple large or protected trees could still be exempt from Site Plan Review. Projects that destroy these irreplaceable and rare resources should undergo a Site Plan Review process.
- Any Project within 100 feet of water features (lakes, reservoirs, ponds, wetlands, rivers, streams, creeks, riparian areas), open channels, or Open Space (zoned open space, conservation easements, protected areas). The October 2022 Draft only requires Site Plan Review for certain projects within much smaller buffers (See Table 4.1 on page 20). As outlined in the August 2021 Letter, buffers of a minimum of 100 feet are supported by multiple scientific studies, including the Sustainable LA Grand Challenge Sustainability Report Card for Los Angeles County. Moreover, the definition of “Open Space” must include Santa Monica Mountains Conservancy¹ (“SMMC”) mapped “habitat blocks”, National Park Service mapped native woodlands² and “habitat for protected species” per Government Code Section 65913.4(a)(6)(J). This proposal would not preclude all development within this buffer; it would simply require a review process to ensure protection of sensitive resources and wildlife connectivity.
- Any Project that cannot meet its Guaranteed Minimum Residential Floor Area calculations because of grading, lot coverage, slope, or height limitations.

Second, in addition to existing requirements, the Site Plan Review process should require (1) a public hearing (and adequate notice thereof) and (2) an opportunity for the public to provide written and oral comments on the project and any proposed modifications/mitigation measures. Moreover, for a project to be approved pursuant to the Site Plan Review process, the Planning Department and/or Hearing Officer must make discretionary findings based on the record that the project—with the inclusion of project modifications and/or mitigation measures—meets each of the criteria set forth on pages 21-22. These goals set forth in the October 2022 Draft include that the project is highly compatible with and will have minimal impact on any natural features or resources, will avoid substantial landform alternation, and is highly compatible with biotic resources, among other criteria. As currently stated in the October 2022 Draft, it is ambiguous whether the decisionmaker is required to make these findings, or whether an applicant can simply submit materials that *merely support* such findings. Those are profoundly different thresholds. A strong ordinance requires a public process where the decisionmaker must affirmatively make the required findings prior to approving a development proposal.

¹ Santa Monica Mountain Conservancy’s Eastern Santa Monica Mountains Habitat Linkage Planning Map is available at <https://smmc.ca.gov/wp-content/uploads/2021/12/Eastern-Santa-Monica-Mountains-Habitat-Linkage-Planning-Map-Copy.pdf>.

² The data from the mapping is publicly available and can be accessed at <https://gisucla.maps.arcgis.com/apps/instant/basic/index.html?appid=868b0af352f5426c8ecef8d31e0796f9>. The full NPS report can be accessed at <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18243>.

Letter re Proposed Wildlife District Ordinance; November 14, 2022

II. Rationale for the Wildlife Ordinance

As outlined in our [July 2022 letter](#) to the City Planning Department, the City urgently needs a strong wildlife ordinance. Life on Earth is experiencing a sixth mass extinction, with species disappearing at a rate of more than 1,000 times greater than the background extinction rate.³ Habitat loss and fragmentation are the primary drivers of the extinction crisis. Combating this crisis requires engagement from all levels of government. In Southern California, local jurisdictions such as Ventura County have already adopted wildlife ordinances, and the City has an opportunity to join other forward-thinking jurisdictions in using its land use authority to protect wildlife and ecosystems.

In Los Angeles, local mountain lions exemplify the need for a strong wildlife ordinance. Local mountain lions are often unable to find mates, food, and shelter due to barriers caused by poorly sited development and roads. Southern California mountain lions – including the local Santa Monica Mountains population within the City – are now provisionally listed under the state endangered species act primarily due to loss of habitat connectivity. A strong wildlife ordinance will help ensure the survival of local mountain lions and advance the state’s policy of preserving threatened and endangered species.

A strong wildlife ordinance will enhance fire safety.⁴ The science is clear that increased development in high fire-prone wildlands can lead to more human-caused ignitions, as most contemporary wildfires in California are caused by human sources such as power lines, car sparks, cigarettes, and electrical equipment.⁵ Building new developments in high fire-risk areas increases unintentional ignitions and places more people in danger. Since 2015, almost 200 people in the state have been killed in wildfires, more than 50,000 structures have burned down, hundreds of thousands have had to evacuate their homes and endure power outages, and millions have been exposed to unhealthy levels of smoke and air pollution.⁶ In addition, increasing fire frequency due to development is converting chaparral and sage scrub ecosystems into non-native grasses that burn more easily, leading to a dangerous “feedback loop” of increasing fire and degraded habitats. A strong wildlife ordinance is an important step to combat these issues.

A wildlife ordinance will also foster climate resiliency. Climate change is worsening ecosystem stress and increasing variability in temperature, leaving plants and wildlife struggling to adapt. A permeable landscape allows species to adjust to shifts in resource availability and help ensure populations persist after extreme events worsened by climate change. For example, during wildfires and floods, a permeable landscape provides escape routes for animals seeking safety.

³ Center for Biological Diversity, *California Connections: How Wildlife Connectivity Can Fight Extinction and Protect Public Safety* (Aug. 2021), available at <https://www.biologicaldiversity.org/campaigns/wildlife-connectivity/pdfs/California-Connections-wildlife-connectivity-report.pdf>.

⁴ Greenbelt Alliance, “The Critical Role of Greenbelts in Wildfire Resilience” (2021), available at <https://www.greenbelt.org/research/the-critical-role-of-greenbelts-in-wildfire-resilience/>.

⁵ Center for Biological Diversity, “Built to Burn: California’s Wildlands Developments Are Playing With Fire” (Feb. 2021), available at <https://www.biologicaldiversity.org/programs/urban/pdfs/Built-to-Burn-California-Wildfire-Report-Center-Biological-Diversity.pdf>.

⁶ CAL FIRE Incidents. CAL FIRE (2015-2020), Accessed, March 15th, 2021. <https://www.fire.ca.gov/incidents>

The welfare of humans is deeply linked to nature and access to open space. Open space has been vital to many communities during the pandemic and provided community spaces for safe socially distanced gatherings. Continued preservation and increased access will help ensure all Angelenos experience the physical and mental health benefits of nature. Native landscapes help us regulate our climate, purify our air and water, pollinate our crops and create healthy soil. In addition to the direct benefits from access, preservation of our native habitats and the species that rely on them is critical to our long-term health and wellbeing.

By supporting a strong wildlife ordinance, the City can join other leaders and jurisdictions in forward-thinking efforts in biodiversity and environmental health, such as Ventura County's wildlife connectivity ordinances, Governor Newsom's 30 by 30 conservation goals, and Representative Adam Schiff's Rim of the Valley Preservation Act.

For all of these reasons, we urge you to expeditiously recommend approval of a wildlife ordinance with the amendments proposed above.

Sincerely,

J.P. Rose
Policy Director & Senior Attorney
Urban Wildlands Program
Center for Biological Diversity

Jim Hines
Team Leader
Sierra Club California Wildlife Team

Gerry Hans
President
Friends of Griffith Park

Wendy-Sue Rosen
Co-founder
Brentwood Alliance of Canyons & Hillside

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

cc:

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Letter re Proposed Wildlife District Ordinance; November 14, 2022