



CITIZENS FOR  
LOS ANGELES  
WILDLIFE

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November 14, 2022

Los Angeles City Planning Commission  
200 N. Spring Street, Suite 525  
Los Angeles, CA 90012  
Via: [cpc@lacity.org](mailto:cpc@lacity.org)

**SUPPORT for Wildlife District Ordinance (CPC-2022-3413-CA and CPC-2022-3712-ZC) WITH AMENDMENTS**

Dear City Planning Commissioners:

Citizens for Los Angeles Wildlife (CLAW) is a non-profit environmental organization concerned with the wellbeing of wildlife and wildlife habitat for the City of Los Angeles and beyond. A citizenry of more than 5,000 individuals support our organization's multiple calls for practices and policy to benefit biodiversity in LA City, County, California and the globe. CLAW, therefore, joins the Los Angeles Times (editorial attached), LA Hillside Councilmembers, and thousands of hillside stakeholders who have been following and supporting the carefully crafted regulations of the Wildlife Ordinance through the years. We recognize that the ordinance supports the State's efforts to enhance biodiversity, and also helps to achieve goals and targets related to staving biodiversity loss as outlined in LA's Green New Deal.

CLAW urges the Planning Commission to support the proposed regulations of the latest draft of the Wildlife Ordinance (WO), and also make amendments to strengthen its effectiveness. Please support the following (justifications are on the next page):

1. **Wildlife Resources** – Revert to regulations in the WO draft 2; development 50 feet from open space resources must go to Site Plan Review. The current draft's reduction to a 25 foot buffer does not suffice. Further, non-contiguous buffers divided by a road should trigger Site Plan Review, as well.
2. **Lot Coverage** – Revert to regulations in the WO draft 2; make no exemptions for R1 and R2 lots. Lot coverage is an essential spatial consideration especially for narrow habitat linkages and chokepoints and the proposed exemptions are inconsistent and inequitable to neighborhoods with average-size residential lots.

3. **Residential Floor Area** – Revert to regulations in the WO draft 2; the current draft’s change will allow Severe Slopes in floor area calculations; however, Severe Slopes need to be removed to reduce the impact for projects of all sizes, especially near ridgelines.

### **1. Wildlife Resources Buffer**

Why this matters to wildlife: Resource buffers identified in the ordinance contribute to the existing habitat and wildlife corridors that run through the Santa Monica Mountains. Every time those areas are reduced or narrowed, the risk increases for bottlenecks and chokepoints. For healthy ecosystems to remain, there needs to be functioning connective habitat. In addition, nearby development needs to be regulated as an “area of Inclusion,” meaning that all nearby projects to open space should have limitations in mass, lighting, fencing, height, and impervious surfaces. Much of this can be achieved in Site Plan Review, but the reduced open space buffer from 50 feet to 25 feet will remove many projects from oversight and threaten wildlife resources. Moreover, while a 25 foot buffer will send projects on both sides of open space resources to Site Plan Review, an equally important project across the street from open space will not trigger Site Plan Review. To allow an undeveloped lot directly across the street from parkland to be exempted from Site Plan Review would be unacceptable. CLAW proposes to reinstate the 50 foot open space buffer or to make the 25 foot buffer a non-contiguous measurement, i.e. a distance that omits improved and paper roads from its measurement.

### **2. Lot Coverage**

Why this matters to wildlife: Lot coverage in the ordinance includes hardscape and other obstacles inside the lot area aside from the home. If a lot is exempted from lot coverage and permitted to fill the entire area with built environment from lot line to lot line without allowing for wildlife thoroughfare, then the property will contribute to wildlife blockages or drastically narrow passageways. These are outcomes in direct opposition to the intent of the ordinance. Lots, no matter the size, especially the last open lot on a block, and especially if abutted by developed and fenced properties, have the potential to block animal pathways unless regulated against doing so. Since the latest draft has removed setbacks, fencing, and other spatial elements from the ordinance, the R1 and R2 exemption must not be allowed. Moreover, R1 and R2 lots vary a great deal in size and using this standard is an unfair standard for neighborhoods trying to preserve wildlife connectivity.

### **3. Residential Floor Area**

Why this matters to wildlife: Historically, steep slopes (like other biological resources including water and trees) created natural thoroughfares for wildlife to cross terrain. However, with engineering advancements, building has crept up the steepest terrain of the Santa Monica Mountains and created larger homes that are contributing to blockages where wildlife used to cross. Excluding Steep Slope (60% and above) from floor area calculations would help reduce mass on all projects within the pilot district and has been included in all previous iterations of the ordinance. Given that ALL ridgeline regulations have been removed from the current ordinance draft, excluding Severe Slope becomes a necessary tool to manage mass near ridgelines and should be reinstated.

Thank you for receiving our comments. CLAW urges the LA City Planning Commission to adopt the pilot Wildlife Ordinance. We also thank the Planning Department for making wildlife habitat and connectivity a priority through the creation of the Wildlife Ordinance.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tony T.', is positioned above a light gray rectangular box.

Tony Tucci, Chair

*CLAW is a public benefit non-profit 501(c)(3) environmental organization that works to protect and restore the environments of wildlife of Los Angeles and California from dwindling open spaces. Our mission is to promote, educate and protect the fundamental importance of wildlife, wildlife habitats and wildlife corridors everywhere.*

## Editorial: If we want wildlife to thrive in L.A., we have to share our neighborhoods with them

[latimes.com/opinion/story/2022-11-07/los-angeles-wildlife-district-ordinance](https://latimes.com/opinion/story/2022-11-07/los-angeles-wildlife-district-ordinance)

By The Times Editorial Board Nov. 7, 2022 5 AM PT November 7, 2022



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Los Angeles abounds with wildlife, and now the city is creating its first wildlife ordinance that would regulate development to protect wildlife and biodiversity unique to Southern California. Above, a deer stands on the edge of a field near a row of residences. (Citizens for Los Angeles Wildlife)

No one knows exactly how the young male mountain lion found resting near a country club on a busy street in Brentwood last month got there. But he probably left a hillside perch, made his way through a residential neighborhood, then crossed San Vicente Boulevard. Had

he never been spotted (and tranquilized and returned to the Santa Monica Mountains without incident) he would have probably hunkered down under cover of trees, waited for night and then returned to the hills.

Although a daytime sighting of a mountain lion in an urban neighborhood is rare, Los Angeles abounds with wildlife. For decades, development has encroached upon open space and hillside habitats, endangering the existence of Southern California mountain lions and other animals and species of plants. Now, the city is creating its first wildlife ordinance that would comprehensively regulate development to protect the biodiversity of Los Angeles.

Eight years ago, City Councilman Paul Koretz introduced a motion calling upon the planning department to craft a wildlife ordinance. When the necessary funding for this effort was finally allocated to the department three years ago, it began working with ecologists, the Santa Monica Mountains Conservancy and community wildlife advocates, including Citizens for Los Angeles Wildlife, to strike a balance between allowing new construction while ensuring the survival of the wild animals that are living on this land.

On Nov. 17, the ordinance goes to the Planning Commission, which can recommend approval to the L.A. City Council or ask for changes before doing so. The City Council has to vote it into law.

The proposed ordinance would create a wildlife district in the Santa Monica Mountains, between the 405 and 101 freeways that includes neighborhoods in Studio City, the Hollywood Hills and Bel-Air. Within that district, the city would dictate how much of the lot can be covered by structures, the height of homes, the type of outdoor lighting and the landscaping required. The ordinance also addresses the kinds of fencing materials allowed, so animals won't get injured, and the treatments of glass windows over a certain size to discourage animals from running into them.

The goal is to maintain and enhance habitat so that animals can travel through these areas easily without getting blocked or hurt, and to have plantings that are fire-resistant and native to the environment as well as provide food for animals.

The ordinance would apply only to new construction, extensive remodeling of the existing structures or an addition 500 square feet or more. The wildlife district could be expanded in the future to include other areas of the city with wildlife and plant populations that should be protected.

The proposal has faced opposition from some hillside residents who say they love wildlife — “I have 10 bird feeders on my property,” said one homeowner — but saw the ordinance as a violation of property rights.

It's not. The proposed ordinance places reasonable restrictions on private land located in sensitive habitat to protect the wildlife and biodiversity that are unique to Southern California. In fact, some wildlife experts argue the current proposed ordinance isn't as strong as it should be.

The planning department initially proposed restricting all houses and other structures on parcels in the wildlife zone to 50% of the lot. Owners of smaller single-family lots, however,

complained vociferously that it was too onerous to comply with. So, in the current draft, the department exempted smaller single-family lots, which make up about 6% of 23,000 acres within the proposed district.

Experts who have spent years studying wildlife connectivity paths through this area say it is the smaller parcels that, once they are built up, could close off a last remaining cut-through or pathway for wildlife. That would undermine what the city should be trying to do, which is to help the movement of animals across this entire district.

A wildlife ordinance is a necessary tool for maintaining the biodiversity in hillsides where it's dwindling. The only way to do that is to make sure these habitats don't get overbuilt. That means some restrictions on land use. Los Angeles is not the first region to create a wildlife ordinance. Ventura County passed one in the last few years that protects a chunk of the county.

If there are no corridors for wildlife movement and if excessive excavation of dirt to build bigger, taller houses erodes the slope of a hillside, then we are slowly destroying wildlife habitat. For those people fretting about what this will do to their property values — isn't open space, trees, and wildlife an amenity in these communities?

Animals need to be able to live among us and cross through our neighborhoods and spaces, without them endangering us and without us endangering them.

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