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**VIA ELECTRONIC MAIL**

November 14, 2022

Argyle Civic Assn.  
Beachwood Canyon NA  
Bel-Air Assn.  
Bel-Air Hills Assn.  
Bel Air Knolls Property Owners  
Bel Air Skycrest Property Owners  
Benedict Canyon Association  
Brentwood Hills Homeowners  
Brentwood Residents Coalition  
Bundy Canyon Assn.  
Cahuenga Pass Property Owners  
Canyon Back Alliance  
Crests Neighborhood Assn.  
Dixie Canyon Assn.  
Doheny-Sunset Plaza NA  
Franklin/Hollywood West Res.  
Franklin Hills Residents Assn.  
Highlands Owners Assn.  
Hollywood Dell Civic Assn.  
Hollywood Heights Assn.  
Hollywoodland HOA  
Holmby Hills Homeowners Assn.  
Kagel Canyon Civic Assn.  
Lake Hollywood HOA  
Laurel Canyon Assn.  
LFIA (Los Feliz)  
Mountaingate  
Mt. Olympus Property Owners  
Mt. Washington Homeowners All.  
Nichols Canyon NA  
Oak Forest Canyon HOA  
Oaks Homeowners Assn.  
Outpost Estates HOA  
Pacific Palisades Res. Assn.  
Residents of Beverly Glen  
Save Coldwater Canyon!  
Save Our Canyon  
Shadow Hills POA  
Sherman Oaks HOA  
Silver Lake Heritage Trust  
Studio City Residents Assn.  
Sunset Hills HOA  
Tarzana POA  
Upper Mandeville Canyon Assn.  
Upper Nichols Canyon NA  
Whitley Heights Civic Assn.

**Re: November 17, 2022, Items 9 &10; CPC-2022-3413-CA, CPC-2022-3712-ZC, and ENV-2022-3414-CE**

Dear President Millman and Commissioners:

The Federation of Hillside and Canyon Associations, Inc. (“Hillside Federation”), founded in 1952, represents 46 homeowner and resident associations with approximately 250,000 constituents spanning the Santa Monica Mountains. The Federation’s mission includes protecting the property and quality of life of the residents of the Santa Monica Mountains and other hillside areas of Los Angeles and its environs, and encouraging and promoting those policies and programs which will best preserve the natural topography and wildlife of the mountains and hillsides for the benefit of all the people of Los Angeles.

The Hillside Federation continued to strongly support the proposed Wildlife District Ordinance (“Ordinance”). However, the Hillside Federation believes that the current draft of the Ordinance has room for improvements and offers the following comments and suggested revisions:

**Addition of “Habitat Trigger” for Site Plan Review**

The new draft has not successfully achieved ensuring that development projects most likely to result in substantial loss to wildlife habitat are subjected to Site Plan Review - where a more focused, site-specific analysis can be undertaken to ensure that landform alteration is minimized, impacts to biotic resources reduced and project modifications considered.<sup>1</sup> We are therefore requesting the addition of a “habitat trigger” for Site Plan Review.

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Steve Twining  
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Brian Moore  
Gordon Murley  
Polly Ward

<sup>1</sup> See Site Plan Review Wildlife Findings at page 26 of Ordinance.

Currently, there are only three triggers for Site Plan Review in the Ordinance, which include the following: (1) 1,000 cubic yards or more of remedial grading, (2) homes of 7500 square feet or larger and (3) building within a Wildlife Resource or buffer. Unfortunately, Site Plan Review will not be triggered for many development projects that result in significant habitat loss. This is because the City has too narrowly defined “Wildlife Resource” to include only zoned or protected open space and water resources. See Table 7.2. Development can occur via this Ordinance that will result in significant habitat loss to protected species and native woodlands without ever triggering Site Plan Review. This is a problem. Substantial swaths of high-value habitat exist on large, undeveloped lots in the Pilot Study Area and we strongly contend that the development of these lots should be subject to Site Plan Review. Preventing habitat loss is a critical function of any wildlife ordinance and inclusion of a habitat trigger for Site Plan Review makes perfect sense.

We are suggesting the following habitat trigger:

- Proposed removal of 4 or more protected trees

Adding this trigger would ensure that development of lots with high habitat value is done with sensitivity towards the preservation of that habitat.

#### Reduction in Size of Home Triggering Site Plan Review

The Hillside Federation believes that the 7,500 square foot trigger for Site Plan Review should be reduced to between 3,000 to 4,000 square feet. A modern family can be fully accommodated by a home of this size.

#### Revision to Definition of Open Space

The City has proposed to delete the following sentence from the definition of “Open Space:” Open Space shall also include City-owned vacant land that, while not zoned as Open Space, meets the criteria above.” The Hillside Federation strongly opposes this deletion. City-owned vacant land in the hillsides provides abundant habitat for wildlife. The deletion of this sentence would allow development to be built *within* 25 feet of these City-owned lots without ever triggering Site Plan Review resulting in significant habitat loss. There is no legitimate basis to exclude City-owned land that meets the criteria for being considered open space from being deemed “open space.” To the extent that the City is concerned that City-initiated developments could be subjected to Site Plan Review, the Ordinance could be amended to clarify that development initiated by the City is exempt from the ordinance altogether.

Thank you for your attention in this matter.

Very truly yours,



Charley Mims  
President, Hillside Federation

CC: Councilmember Paul Koretz  
Councilmember Nithya Raman  
Councilmember Mike Bonin