P.O. Box 27404 Los Angeles, CA 90027 www.hillsidefederation.org

PRESIDENT
Charley Mims
CHAIR
Marian Dodge
VICE PRESIDENTS
Mark Stratton
Jamie Hall
SECRETARIES
Julie Kremkus
Robin Greenberg
TREASURER
Don Andres

Argyle Civic Assn. Beachwood Canyon NA Bel-Air Assn. Bel-Air Hills Assn. Bel Air Knolls Property Owners Bel Air Skycrest Property Owners Benedict Canvon Association Brentwood Hills Homeowners **Brentwood Residents Coalition** Cahuenga Pass Property Owners Canyon Back Alliance Crests Neighborhood Assn. Dixie Canvon Assn. Doheny-Sunset Plaza NA Franklin Ave./Hollywood Bl. West 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 Canvon NA Oak Forest Canyon HOA Oaks Homeowners Assn. Outpost Estates HOA Pacific Palisades Res. Assn. Residents of Beverly Glen Save Coldwater Canyon! Save Our Canvon 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 Canvon NA Whitley Heights Civic Assn.

CHAIRS EMERITI Shirley Cohen Jerome C. Daniel Patricia Bell Hearst Alan Kishbaugh Steve Twining CHAIRS IN MEMORIAM Brian Moore Gordon Murley Polly Ward



Patrick Whalen, City Planning Associate 200 N. Spring Street, Room 701 Los Angeles, CA 90012 patrick.whalen@lacity.org

June 22, 2021

Re: Ridgeline Protection Ordinance

Dear Mr. Whalen:

The Hillside Federation, founded in 1952 and representing 45 resident and homeowner associations spanning the Santa Monica Mountains, has been anticipating a Ridgeline Protection Ordinance for more than twenty years. It has been our dream to get an ordinance similar to the one that Los Angeles County has enjoyed for years. We were so excited when it was announced that such an ordinance would be released soon.

Imagine our disappointment when the Ridgeline Protection Ordinance was finally released and informational webinars revealed that what we were being offered was merely a Ridgeline Protection *Supplemental Use District*, not a true *citywide* ordinance. It is instead only a pilot program in the Bel Air - Beverly Crest area and a small portion of the Hollywood Community Plan. Why do we need a pilot program for something the County has been successfully doing for decades and something for which the Hillside Federation has been begging the City for at least as long?

The ordinance should apply citywide now. It is simply nonsense that each community plan has to individually request the addition of the Ridgeline Protection Ordinance. Why should each area have to beg and grovel to get protections to which they are rightfully entitled? The Ridgeline Protection Ordinance should automatically be included in every Community Plan.

We all remember how, after a lengthy planning process (2005-2012), the Hollywood Community Plan ended up being rescinded in 2014 due to a lawsuit. Hollywood has reverted to its 1988 community plan while update attempts are still dragging on. In all likelihood a very similar scenario will play out here: a lawsuit will be filed against the current version of the HCPU2. That means that although we have requested that the Ridgeline Protection Supplemental Use District be added to the Hollywood Community Plan Update 2, we will be further delayed in getting these desperately needed protections – if indeed we ever do get them. Meanwhile, developers are free to continue destroying our ridgelines.

An additional disappointment was the creation of separate rules for ridgelines that have already been disturbed. As you accurately pointed out in the webinar, the vast majority of ridgelines have already been disturbed. That is no reason to allow those ridgelines to be further degraded. On the contrary, they are all the more environmentally sensitive because of what has already been done to them and it is all the more imperative that any new construction, addition, or remodel stay within its current footprint or comply with the parameters established for RP1. Of course existing buildings should be allowed to remain. However we see no reason why a property owner should be allowed to further degrade the ridgeline just because it is already partially degraded. RP1 should be the only model.

And one other very big question remains: how will the Ridgeline Protection Ordinance be enforced? Enforcement is always the elephant in the room.

Unfortunately, like so many of the Planning Department's recent decisions, the Ridgeline Protection Ordinance's slow motion rollout and lack of enforcement provisions seem designed not to protect our ridgelines but to give developers more leeway and reduce community input and participation in the process. In order to truly protect our ridgelines, the following very precise and <u>timely</u> actions are required:

- 1. The Ridgeline Protection Ordinance must be applicable citywide to all ridgelines *not a pilot program*.
- 2. The Ridgeline Protection Ordinance must be included in every Community Plan.
- 3. RP1 should be the only model.
- 4. Rigorous enforcement must be included.

Then, and only then, will we have an ordinance worthy of the City of Los Angeles. If all these conditions are not met and met quickly, by the time the Ridgeline Protection Ordinance is actually implemented, there won't be any ridgelines left to protect.

Sincerely,

Charley Mims

Charley MMins