

August 29, 2024

# VIA EMAIL (planning.urbandesign@lacity.org)

Dorothy Qian, Planning Assistant Department of City Planning 221 N Figueroa Street, Suite 1450 Los Angeles, CA 90012

Re: Proposed Landscape and Site Design Ordinance and Point System

Dear Dr Ms. Qian:

Please consider the following comments from the Bel Air-Beverly Crest Neighborhood Council, which represents the neighborhoods in the City of Los Angeles between the 405 Freeway on the west, Mulholland Drive on the north, Laurel Canyon Boulevard on the east, and Sunset Boulevard on the south.

The current Landscape Ordinance for the City of Los Angeles is obsolete — it was last updated in 1996. With the new proposed Landscape and Site Design Ordinance, the City sets out to provide a set of codes that will create a healthier and more biodiverse living environment for all communities throughout Los Angeles by ensuring that new projects provide spaces for nature, and by making streets and sidewalks more walkable.

There is pressure in our city to build new housing and to do so in a manner that reduces discretionary reviews and processing times. Unfortunately, we have seen that without environmental reviews, buildings are being built without setbacks and without green spaces. The challenge for the Department of City Planning was to develop specific standards that will ensure sustainability without the usual lengthy reviews. We believe the Department has worked diligently to meet this challenge.

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## STAKEHOLDER GROUPS

Bel Air Association
Bel-Air Crest Master Association
Bel Air Hills Association
Bel Air Ridge Association
Benedict Canyon Association
Casiano Estates Association
Doheny-Sunset Plaza Neighborhood Assn.
Holmby Hills Homeowners Association
Laurel Canyon Association
Residents of Beverly Glen

## RESIDENTIAL DISTRICTS

Bel Air Glen District

Franklin-Coldwater District
North of Sunset District
NON-RESIDENTIAL REPRESENTATION
At-Large Members
Commercial or Office Enterprise Districts
Custodians of Open Space
Faith-Based Institutions
Public Schools
Private Schools K–6 and 7–12

At the same time, State housing laws now require cities to use fixed and measurable guidelines. In response, the City designed a flexible, objective, point system. We are pleased to see that this point system is easy to understand. It awards points for nine different design areas and we are especially pleased to see that points are "subtracted" for the removal of trees. This proposed Landscape and Site Design Ordinance offers a truly comprehensive set of guidelines in approaching all elements of a healthy biodiverse environment. For example, it also awards points to builders who opt to use bird-safe glass or use landscape lights at night in a manner that is wildlife friendly.

The LANCSA (Los Angeles Neighborhood Council Sustainability Alliance) is submitting a letter with amendments to the second draft of the ordinance; its recommendations were carefully crafted by its Trees Committee which includes landscape professionals. These amendments, for the most part, are meant to clarify certain details of the guidelines to ensure that the right trees are planted, that they are planted properly, and that they have the best chance of surviving. Furthermore, the intention is to prevent any misinterpretations of the guidelines and to close any possible loopholes. For these reasons, we recommend that these amendments be considered seriously by the City and that they be incorporated into the final draft of the Landscape and Site Design Ordinance.<sup>1</sup>

The City's Tree Canopy is in decline, and we cannot afford to waste any more time in passing an updated Landscape Ordinance. We urge the City to move as quickly as possible to codify the proposed Landscape and Site Design Ordinance, and we recommend incorporating the amendments recommended by the NCSA Tree Committee.

This letter was adopted by a vote of 23 yes, 0 no, and 0 abstentions at a publicly noticed regular meeting of the Board of the Bel Air-Beverly Crest Neighborhood Council on August 28, 2024.

Thank you for consideration.

Sincerely,

Travis Longcore, Ph.D.

President

<sup>&</sup>lt;sup>1</sup> This recommendation of the NCSA letter does not represent an endorsement of the last line of the second paragraph "We have measured 30 degrees-cooler readings under tree shade versus the reading at the adjacent unshaded sidewalk on a hot July day."