



July X, 2021

Re: Comments on the Proposed Ridgeline Ordinance

Dear Planning Staff:

For the past 20 years we have watched our remaining ridgelines be permanently altered or destroyed. This destruction has led to the Bel-Air Beverly Crest Neighborhood Council fighting for needed protections of our shared ridgelines. The beauty and importance of these natural resources cannot be overstated or replaced, which is why the City must take steps to ensure their preservation.

Having reviewed Planning Staff's DRAFT Ridgeline Ordinance, we are heartened to see the efforts the City is taking to protect our remaining ridgelines. However, the absence of any meaningful ridgeline protection for the past 70 years has meant streets, neighborhoods and communities have grown throughout these hillsides, causing many of these residents to express concern about the Proposed Ridgeline Ordinance and the impact it may have on their homes. These concerns are valid and should not be ignored.

We support Councilmember Koretz's effort to have the Planning Department recraft an ordinance that serves all Angelenos. That ordinance should not penalize those who have called our ridgelines home with overburdensome regulations or thrust them into uncertainty by making their home "non-conforming." Nor should a community under threat of fire and earthquake fear the inability to rebuild should the unthinkable occur.

Our primary focus has been and will always be those pristine ridgelines that remain largely untouched. Paramount to the success of this effort are:

- Ensuring continuity of regulations between the proposed Supplemental Use District and the Mulholland Specific Plan area. As currently mapped, properties along the same street next door to each other would be subject to different regulations and implementing authorities that could cause conflict and confusion.
- Crafting a Ridgeline Ordinance boundary that mirrors the Bel-Air Beverly Crest Neighborhood Council Area. This is important as we share common hillside issues, City legislation, and representation.

- Providing a DRAFT MAP that accurately depicts the RP1 Zone as being applied to pristine ridgelines, and NOT applied to largely developed hillside areas. The current mislabeling of the RP1 Zone has led to confusion and concern from many homeowners thinking their current properties will be governed by the more restrictive Zone.
- Evaluating the need and desired result of the RP2 Zone, especially as it relates to developed single-family streets. The current regulations attempt to stop the development that has already occurred, and the regulations are silent on the development that snakes down the ridgeline, which could be addressed through a limit on the cumulative cap of the envelope height in slope banding.
- Ensuring that the ordinance is clear about what constitutes “nonconforming” to avoid confusion and anxiety among property owners about the ordinance.
- Ensuring that the Ridgeline Ordinance is not overridden by other ordinances currently in development (e.g., the Wildlife Pilot Ordinance), nor should it relax the requirements of previously adopted regulations.
- Only allowing grading for projects that have been fully vested, as defined by California law. This type of vesting threshold is common in many municipalities and will stop the filing of “placeholder” projects.
- Providing clarity regarding grading and its limits. Lack of public oversight in exceptions to grading should also be addressed. The Ridgeline Ordinance should require findings with a clearly defined limit on the amount of grading permitted for any project (including remedial grading) in order to minimize grading, ensure that the graded slopes have a natural appearance compatible with the natural topography and compatible with the characteristics of the Santa Monica Mountains, and that the Department of Building and Safety has determined that grading will minimize erosion.
- Ensuring the transparency and ability of those affected to participate fully and with complete information. With the recrafting of the Ridgeline Ordinance, the community must be given additional time to review, discuss and submit thoughts to the City, including at an additional public hearing, before it is transmitted to the Planning Commission.

We thank the Council Office and the Planning Department for recognizing the need to preserve our remaining ridgelines, and the need to revisit this Draft Ordinance to address very real community concerns. We look forward to continuing this process and working through any differences. Our residents, communities and hillsides demand it.

Thank You,

Bel-Air Beverly Crest Neighborhood Council