



March 25, 2026

City of Los Angeles
 Department of City Planning
 200 N. Spring Street
 Los Angeles, CA 90211
planning.openspace@lacity.org

Re: Comments on the Open Space Element Preliminary Draft

To Whom It May Concern,

The Bel-Air Beverly Crest Neighborhood Council (“BABCNC”) appreciates the opportunity to comment on the preliminary draft of the Open Space Element. As a governmental body created to advocate for the roughly 25,000 Angelenos between the 405 freeway and Laurel Canyon, reaching from Mulholland to Sunset, the preservation and expansion of open space is deeply relevant to our mission.

We recognize that the City of Los Angeles (“City”) is in the process of updating its outdated Open Space Element, which was last updated in 1973. Ahead of the March 31, 2026, public comment deadline, the BABCNC submits the following proposed amendments to strengthen the draft plan and establish a more robust baseline for acquiring and maintaining open space in the City:

- **Rezone Acquired Land to Establish a Baseline:** Establishing a "baseline" of open space in the City is essential to having a functional Open Space plan. The best way to do this is for the City to rezone all land that has already been acquired by the Mountains Recreation and Conservation Authority (“MRCA”), the Santa Monica Mountains Conservancy (“SMMC”), and/or other non-profit land trusts such as the Laurel Canyon Land trust to "Open Space." The realistic value of doing so is that formal designations limit the use of these unimproved lands to the preservation of natural resources and

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Bel Air Association
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 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

outdoor recreation, protecting them from future development. As the preliminary draft notes, open space is rarely recovered once lost to development. Formally rezoning these properties secures our current environmental investments and creates an accurate starting point for the City to track progress, prevent further inequities, and measure future expansion.

- **First Right of Refusal:** The Public Resources Code already provides a first right of refusal for lands within the SMMC Zone. Specifically, PRC 33207(a) ensures that areas offered for open-space dedication or trail easements, as well as lands offered for sale because of tax delinquency, shall not be lost to public use. The conservancy serves as a repository for these lands and may accept dedication of fee title, easements, or development rights. Furthermore, PRC 33207(b) grants the conservancy the first right of refusal on any property within the zone presently owned by a public agency and scheduled for disposal as excess lands, allowing them to acquire such lands at the disposing agency's purchase price plus administrative costs. The City of Los Angeles has already codified this in the Los Angeles Administrative Code (LAAC 7.27.1(g)). The updated Open Space Element should build upon this successful framework. There are other valuable lands in hillside communities—such as those in northeast Los Angeles in Very High Fire Hazard Severity Zones—that the City could sell to conservancies or private land trusts in the event they are ever deemed "surplus land" or "remnant land." Expanding this first right of refusal to the entirety of the City's Very High Fire Hazard Severity Zones and/or hillside areas is an easy and highly effective way for the City to be an active participant in open space acquisition.
- **Identify Desirable Open Space to Create a Master Plan:** The plan should identify "Desirable Open Space" or "Most Significant Area Desirable Open Space" for private properties with high potential for acquisition based on habitat value. It is vitally important that the City work with knowledgeable parties—such as academic institutions like UCLA, the SMMC, the MRCA, private land trusts or the Resource Conservation District of the Santa Monica Mountains—to determine exactly which parcels have high resource value and should be preserved. This identification should serve as our "master plan" for open space. If we do not identify such lands now, we will never make a proper plan. Plus, without this proactive identification, the City might inadvertently greenlight the development of parcels that have exceptionally high resource value. Furthermore, we support using more precise designations such as "High Value Recreational Open Space" and "High Value Ecological Open Space."
- **Open Space Impact Fees:** The City should impose Open Space impact fees for vacant land that is developed within all hillside areas, not just the SMMC Zone. The collected fees must be explicitly dedicated to the acquisition of new open space. Historically, the City has used a lack of resources as an excuse to not be an active participant in open space acquisition, instead expecting others to do that work. Imposing this fee would remove that excuse and ensure there is an appropriate mitigation for the loss of habitat.
- **QUIMBY Fee Flexibility:** We recommend relaxing QUIMBY fee requirements so those funds can be utilized for open space acquisitions. Currently, the City unreasonably takes

the position that such fees cannot be used for open space acquisition because there must be an active recreational use (like a swing set, seesaw, etc.) on the property. This ignores the value of open space use by the public, even when there is no active recreational component to the land. Such fees can be legitimately used for such acquisitions, and the City should amend its ordinances to explicitly allow this. This would unlock millions of dollars of funding so that the City could be an active participant in open space preservation.

- **Incorporate Popular Features of the Draft Wildlife Ordinance:** The City should review the draft Wildlife Ordinance and determine what popular features of the ordinance could be implemented through the Open Space Element update. The City spent millions of dollars and many years working on this ordinance—which was ultimately never adopted. Importing the most popular provisions directly into the Open Space Element would ensure that this highly valuable work and extensive investment of resources are not wasted.
- **Identify Proposed Trail Networks:** The plan should include the explicit identification of proposed trail networks. In hillside communities, there are many informal trails currently being used by residents, often located on "paper streets" or other unused parcels. Due to the significant outdoor access and recreational value they provide to residents, they should be mapped and formally designated as trails. Formalizing these routes aligns with the draft Element's policy to support the ongoing use of paper streets and other properties to connect trails and increase access.
- **Collaborate on Park Management:** The City should formally collaborate with non-profits, such as TreePeople, for park management. In our experience, such partnerships often result in better-maintained parks and open spaces.

Thank you for your time, consideration, and efforts to modernize the Open Space Element to reflect the current ecological and community needs of Los Angeles.
Sincerely,

Dr. Travis Longcore
President
Bel-Air Beverly Crest Neighborhood Council