



September 30, 2026

VIA EMAIL: planning.missingmiddlela@lacity.org; planning.urbandesign@lacity.org

Jeanalee Obergfell, City Planner
Danai Zaire, City Planner
Missing Middle LA Team
c/o Los Angeles Department of City Planning
200 North Spring Street, City Hall Room 750
Los Angeles, CA 90012

Re: Missing Middle LA Draft Ordinances — CPC-2025-4421-CA, CPC-2025-4430-CA, and CPC-2026-4383-CA

Dear Ms. Obergfell and Ms. Zaire:

At its September 23, 2026, meeting, with a quorum present, the Board of the Bel Air-Beverly Crest Neighborhood Council (BABCNC) voted 22-0-0 to express concern regarding the application of the Missing Middle LA initiative within Very High Fire Hazard Severity Zones. This initial letter conveys the Board's position in advance of the October 1, 2026, public hearing. The proposed ordinances will return to our Planning and Land Use Committee for a more detailed review.

BABCNC is concerned about provisions of the Missing Middle LA package that could facilitate additional density in Very High Fire Hazard Severity Zones (VHFHSZs), particularly through locally created incentives, bonuses, or development opportunities that exceed minimum state-law

OFFICERS

President
Ellen Evans
Vice President – Operations
Robin Greenberg
Vice President – Leg. Affairs
Aaron Lawrence
Secretary
Timothy Steele, Ph.D.
Treasurer
Vadim Levotman

COMMITTEES/CHAIRS

Executive – **Travis Longcore, Ph.D.**
Planning and Land Use – **Jamie Hall/Michael Kemp**
Bylaws, Rules and Elections – **Robin Greenberg**
Public Safety and Emergency Preparedness –
Vadim Levotman/Jonathan Brand
Outreach – **Robin Greenberg**
Traffic Committee – **David Christensen**
Public Works and Telecommunications –
Timothy Steele, Ph.D.
Budget and Finance – **Vadim Levotman**

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

requirements. **Much of our Neighborhood Council area lies within a VHFHSZ, and our primary concern is evacuation and emergency access.**

Our hillside neighborhoods are served by narrow, winding streets, many of which are substandard in width or have only one way in and out. During a wildfire, these same streets must accommodate residents evacuating while firefighters and other emergency personnel attempt to enter. Additional households can increase the number of vehicles and the evacuation demand placed on routes whose capacity to absorb additional households has not been demonstrated. We recognize that some additional development may be authorized by state law and therefore fall outside the City's discretion. That makes it more important—not less—for the City to refrain from creating additional local incentives, bonuses, or development opportunities in VHFHSZs unless the capacity and safety of the complete evacuation network have been established.

This evacuation and emergency-access risk is not resolved by how an individual home is built. **Fire-resistant construction and sprinklers may improve a structure's ability to survive a fire, but they do not widen a road, eliminate a bottleneck, provide an alternate exit, or establish that residents and emergency vehicles can safely travel in opposite directions during an evacuation.**

We appreciate that the draft ordinances recognize VHFHSZs in several respects. However, their treatment of fire-hazard areas is inconsistent:

- **Accessory Dwelling Units:** The draft's special fire-area restrictions for locally regulated ADUs appear to apply only to lots located in both a VHFHSZ and a designated Hillside Area, leaving other VHFHSZ lots without the same protection. In addition, the proposed roadway-width standard considers only the street along the property frontage rather than the capacity and safety of the complete evacuation route.
- **SB 9:** The draft permits SB 9 two-unit developments and urban lot splits in VHFHSZs when applicable state mitigation and safety standards are satisfied. These standards may reduce structural fire risk, but they do not necessarily evaluate the capacity of the complete evacuation route serving the property.

We respectfully urge the Department to:

- Refrain from creating additional local density incentives in VHFHSZs beyond what state law requires; and
- Evaluate the complete evacuation network, not merely construction features or roadway width at the property frontage.

Our Planning and Land Use Committee will review the draft ordinances in greater detail, and BABCNC may submit further comments following that review.

Thank you for your consideration. Please enter this letter into the administrative record for the Missing Middle LA draft ordinances.

Sincerely,

A handwritten signature in black ink, appearing to read "Ellen Evans", with a long horizontal flourish extending to the right.

Ellen Evans
President
Bel Air-Beverly Crest Neighborhood Council

cc: Mashael.Majid@lacity.org
charles.turner@lacity.org
board@babenc.org

Community Impact Statement - Submission Details - City Planning Number: CPC-2025-4421-CA

'LA City SNow' via Bel Air-Beverly Crest Neighborhood Council <NC-BABCNC@lacity.org>

Wed, Sep 30, 2026 at 4:12 PM

Reply-To: cityoflaprod@service-now.com

To: eevans@babenc.org

Hello,

Your Community Impact Statement has been successfully submitted to the City Planning Commission.

As a reminder, Pursuant to Los Angeles Administrative Code Section 22.819, a Neighborhood Council may take a formal position on a matter by way of a Community Impact Statement (CIS) or written resolution. If the Neighborhood Council would like to be heard on its CIS or resolution at a Commission meeting, the Neighborhood Council representative must provide the Commission with a copy of the CIS or Resolution sufficiently in advance for review, possible inclusion on the agenda, and posting on the Commission's website.

If the CIS or Resolution pertains to a matter *listed on the Commission's agenda*, during the time the matter is heard, the designated Neighborhood Council representative will have an opportunity to present the Neighborhood Council's formal position. In the Chair's discretion, the Neighborhood Council representative may be asked to have a seat at the table (or equivalent for a virtual meeting) typically reserved for City staff and may provide the Neighborhood Council representative more time than allotted to members of the general public. If the CIS or Resolution pertains to a matter *not listed on the agenda*, the designated Neighborhood Council Representative may speak during General Public Comments.

If you have questions and/or concerns, please contact the Department of Neighborhood Empowerment at NCsupport@lacity.org.

***** This is an automated response, please DO NOT reply to this email. *****

Contact Information

Neighborhood Council: Bel Air-Beverly Crest

Name: Ellen Evans

Email: eevans@babenc.org

The Board approved this CIS by a vote of: Yea(22) Nay(0) Abstain(0) Ineligible(3) Recusal(0)

Date of NC Board Action: 09/23/2026

Type of NC Board Action: Against Unless Amended

Impact Information

Date: 09/30/2026

Update to a Previous Input: No

Directed To: City Planning Commission

Council File Number:

City Planning Number: CPC-2025-4421-CA

Agenda Date: 10/01/2026

Item Number:

Summary: At its September 23, 2026 meeting, the Bel Air-Beverly Crest Neighborhood Council voted 22-0-0 to express concern about applying the Missing Middle LA initiative within Very High Fire Hazard Severity Zones. BABCNC's principal concern is evacuation and emergency access. Many hillside streets are narrow, substandard, or have only one way in and out. Fire-resistant construction and sprinklers may protect individual structures, but they do not widen roads, remove bottlenecks, provide alternate exits, or ensure that residents can evacuate while emergency personnel enter. The draft ADU provisions appear to apply special fire-area restrictions only to properties located in both a VHFHSZ and a designated Hillside Area. The proposed roadway-width standard considers the street at the property frontage rather than the complete evacuation route. Qualifying SB 9 projects may also remain eligible under standards that do not necessarily evaluate evacuation capacity. BABCNC urges the City not to create local density incentives in VHFHSZs beyond those required by state law and to evaluate the safety and capacity of complete evacuation networks. The ordinances will return to BABCNC's Planning and Land Use Committee for further review.

To unsubscribe from this group and stop receiving emails from it, send an email to NC-BABCNC+unsubscribe@lacity.org.



BABCNC Missing Middle Letter 09-30-2026.pdf

417K