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### Balancing Human Development with Wildlife Habitat and Connectivity through the Creation of Land Use Regulations for Private Property in Los Angeles, California

Kat Superfisky

*City of Los Angeles*, [kat.superfisky@lacity.org](mailto:kat.superfisky@lacity.org)

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## Balancing Human Development with Wildlife Habitat and Connectivity through the Creation of Land Use Regulations for Private Property in Los Angeles, California

Urban areas are uniquely positioned to have a significant impact on biodiversity and the health and resilience of ecosystems and therefore play an essential role in advancing conservation goals. Unlike more “wildland” ecosystems, urban ecosystems are not solely owned and/or managed by public entities or with the sole goal of ecosystem restoration. The important plants, animals and ecosystems in cities are scattered across open spaces and public parks that are already protected and being managed for conservation, as well as on private properties that often comprise the majority of land in cities, which supports the need to address biodiversity and climate resiliency at multiple scales, on various land uses, and through a diverse array of strategies. Municipal governments, such as the City of Los Angeles (City), can play an essential role in addressing biodiversity and habitat connectivity on both public and private land in cities through plans, reports and policies that can help to create more “symbiotic cities”. Since public lands are largely already protected, zoned for open space and/or managed by various municipal, county, state, federal and/or non-profit agencies, it is critical to look to private property protections to ensure a cohesive approach to managing urban ecosystems. As such, the City’s Department of City Planning is proposing a Wildlife Ordinance that will enact a set of land use regulations that aim to balance private development with the need for wildlife habitat and connectivity (via standards related to grading; residential floor area; lot coverage; vegetation and landscaping; height; fences and walls; lighting, windows; and trash enclosures). The creation of the Wildlife Ordinance will assist in the management of the urban ecosystems in Los Angeles, California, and also provide other jurisdictions in the region, across California, and around the world with a roadmap for how government entities, and planners in particular, can address biodiversity, habitat connectivity and climate resilience in cities.

### Keywords

Biodiversity, habitat, habitat connectivity, land use regulations, planning, policy, wildlife, wildlife connectivity, wildlife corridors, urban ecosystems

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## INTRODUCTION

The City of Los Angeles (City) is located along the southern coast of California in the most densely populated part of the California Floristic Province, which is one of 36 Global Biodiversity Hotspots—making the urban ecosystems in Los Angeles (LA) extremely important to protect (ESA, 2021). LA County, which the City is a part of, has over 4,200 native species of plants and animals—over 50 of which are considered to be threatened or endangered (Reid-Wainscoat et al., 2021). Biodiversity clearly exists in this urban context, but continues to be degraded and diminished by development and climate change (ESA, 2021), and is challenging to manage (Cooper et al., 2021), thereby meriting the creation of new “land management” protections and strategies to address local and global biodiversity in cities.

Urban areas are comprised of a mosaic of habitats with varying vegetation and resources (Pickett et al., 2017), and are often subdivided into ecologically-arbitrary units that are owned by many different entities and not always “managed” with ecological health and/or enhancement as the primary goal. The important plants, animals and ecosystems in LA are not only found in open spaces or public parks that are already protected and managed; in LA County, only approximately 35 percent of the land area is “protected” (Reid-Wainscoat et al., 2021). With the majority of land in LA being “unprotected” and also privately owned, it is critical to look to private property protections to ensure a cohesive approach to creating connected and healthy ecosystems through the city and across the region.

Maintaining habitat connectivity between public and private properties, “intact” or “pristine” patches of habitat, and the mountain ranges that stretch across and surround the city is extremely important for the health of the plants, animals, and overall ecosystems in LA. Connecting larger, contiguous patches of habitat provides greater ecological value than preserving isolated patches or singular pathways, since it allows for the continual mixing of populations and genes, and also provides better climate change resilience when temperature and precipitation conditions will continue to cause shifts in plant and animal’s ranges. (ESA, 2021)

The need for urban areas to address biodiversity and climate change is extremely important and timely, and is exactly what the City’s proposed Wildlife Ordinance aims to do. Municipal governments and planning departments can play essential roles in serving as “land managers” who can help to create land use regulations that balance development with the need for protecting and enhancing wildlife habitat and connectivity in and through the urban ecosystem. By minimizing the removal and disturbance of biological resources within and adjacent to water and open space resources, and by addressing land use patterns, fencing and structures that create barriers for wildlife movement, the City can better support wildlife movement and regional connectivity in this important Global Biodiversity Hotspot. Ensuring that development takes place in a more sustainable manner also helps support other important goals such as climate resilience, fire safety and watershed health.

## CITY OF LOS ANGELES’ WILDLIFE ORDINANCE BACKGROUND

The City has more than 115 adopted policies that address environmental related goals and the

conservation and protection of natural resources, but previously had no single ordinance focused solely on comprehensively addressing and implementing specific biodiversity protections (ESA, 2021). Rather than focusing on wildlife habitat and connectivity specifically, other plans and regulations have broader objectives such as aesthetic considerations, neighborhood character, view preservation, etc. The existing policies, such as those contained in the General Plan's Conservation Element, help to provide the framework for priorities and protections, with the natural progression then being the development of specific ordinances and regulations (such as the proposed Wildlife Ordinance) that help to implement and enforce the goals laid out in the other plans and policies.

Given the unique challenges associated with hillside development, in particular, there are multiple land use controls that shape development in these areas, including regulations contained in the base zoning, such as setbacks, lot size, lot coverage standards, as well as other supplemental use districts (e.g., hillside construction regulations) and specific plans (e.g., Mulholland Scenic Parkway Specific Plan). While these standards are meant to regulate the size and scale of single family housing in a suburban manner, without a more targeted set of rules to address connectivity for wildlife, housing developments have resulted in constrained or obstructed wildlife pathways, ultimately leading to increased habitat fragmentation and native habitat loss. Many of the lots that are vacant today are steeply sloped, located within landslide areas, and/or contain vegetation and wildlife habitat. Given the constraints on these properties, owners have sought to maximize their return on investment resulting in developments that tend to be larger than those in the past; involve extensive grading, tree and vegetation removal; and tend to leave little or no open space between properties as hillsides property owners seek to maximize development in constrained areas. Increasingly smaller, older homes originally designed with more contextual ecological and hazardous area considerations are also replaced following the same pattern of oversized development that irrevocably destroys unique hillside topography and vegetation.



Figures 1 and 2. The progression of a development project in the Santa Monica Mountains within the City of Los Angeles.

Some examples of developments that impede wildlife movement relate to structures or fencing built up to and continuously along property lines that make wildlife movement between properties and across the landscape increasingly difficult or impossible. Other examples of development's impact on wildlife include the high volume of grading and soil removal that destabilizes hillside landform (soils and topography) and disturbs and denudes vegetation that provides habitat. Unregulated removal or alteration of native or mature trees and degradation of watercourses and riparian areas also continue to threaten wildlife and diminish the benefits of the built and natural environment.

## **PROCESS OF DEVELOPING THE WILDLIFE ORDINANCE**

The Department of City Planning (Planning) began working on the issue of wildlife protection and connectivity in response to a Council Motion (C.F.# 14-0518) adopted in 2016. The Motion instructed Planning to “preserve the wildlife corridors in the eastern Santa Monica Mountains (...) and to develop the necessary land use guidelines and measurable metrics to protect this region and dwindling habitat areas citywide” (Koretz, 2014, p. 1). The process of creating an ordinance that addresses wildlife habitat and connectivity took several years of research, review of best practices, consultations with environmental leaders and experts, academics as well as advocates, which are summarized in the sections below.

### **Wildlife Pilot Study**

As land use regulation experts, but not necessarily trained as ecologists/biologists, the first step Planning staff took was to hire a consultant team of biologists/ecologists to work on the Wildlife Pilot Study, which was a multi-year analysis that helped to inform the creation of the proposed Wildlife Ordinance. The Wildlife Pilot Study aimed to develop recommendations to maintain and enhance wildlife connectivity and ecology within LA. To meet this goal, a report entitled, “Protected Areas for Wildlife and Wildlife Movement Pathways Final Report” was created “1) To evaluate existing biotic conditions within the City’s boundaries and delineate important areas for habitat conservation and enhancement necessary for sustaining wildlife within the city [through the identification of Protection Areas for Wildlife (PAWs)]; 2) to identify important areas for enhancing connectivity for wildlife movement within the city [through the identification of Wildlife Movement Pathways (WMPs)]; and 3) to provide a rational basis to inform the creation of guidelines and regulations for conserving and managing biological resources within these areas” (ESA, 2021, p. 2).

### **Consultations with Other Jurisdictions and Experts**

Aside from working closely with biological/ecological consultants, the Planning staff conducted additional research and consulted with local and national experts on subject matter related to the potential Ordinance regulations. Planning staff looked to existing strategies being used to address wildlife and natural resource protection, climate and hazard planning, gleaned best practices and precedents from other jurisdictions to identify differences in applicability, thresholds, exemptions, and review processes among these jurisdictions and to inform the development of standards that protect wildlife habitat, particularly in hillsides, to the greatest possible extent. Jurisdictions consulted share the commonality of having steep hillside terrain, and include: Los Angeles, San Diego and Ventura Counties; Malibu; Calabasas; Burbank; Glendale; Beverly



Hills; and Pasadena; as well as other jurisdictions in the country, such as Seattle; Portland; and Pittsburgh.

### **City of LA Departmental Consultations**

In addition to evaluating best practices from other jurisdictions, staff created a Technical Advisory Committee (TAC) comprised of project review planners assigned to various hillside geographies, and coordinated with other City departments such as: the Bureau of Engineering (BOE), the Department of Building and Safety (DBS), the Department of Recreation and Parks (RAP), and Department of Water and Power (DWP), the LA Fire Department (LAFD), LA Police Department (LAPD), the Department of Animal Services, LA Sanitation and Environment (LASAN), and the Urban Forestry Division of the Bureau of Street Services (UFD). Regulations were discussed along with details of implementing and enforcing the regulations, since other departments play key roles in reviewing and implementing certain portions of the Ordinance and/or have experience implementing similar best practices for wildlife on City-maintained properties.

### **Urban Ecologist Position Created**

In November of 2019, the City hired the first Urban Ecologist, who is the author of this article, with the main purpose of providing the largest planning department in the country with the ecological perspective and expertise needed to complete the Wildlife Ordinance. This position has helped to bring plants, animals and ecology into planning conversations more regularly, and has helped to tie the planning department's work to the City's broader goals of climate resilience, sustainability, biodiversity, and equity.

### **Collaborations with Academic Institutions and Students**

Planning staff collaborated with landscape architecture students in a 2019 California State Polytechnic University, Pomona Landscape Architecture Urban Ecology Studio to profile wildlife species and develop design concepts and graphics that illustrated how the potential land use regulations being considered by the City could be applied to residential properties within the hillsides to effectively integrate wildlife areas and support species resilience. Staff also collaborated with institutions such as the University of California, Los Angeles and Occidental College to host informational webinars, and to connect to the latest research on topics such as biodiversity, climate change and wildlife connectivity.

### **Public Outreach and Engagement**

Throughout the Ordinance development process, community members, environmental advocates, neighborhood councils, tribal government representatives, and nonprofit organizations were consulted to gain additional insight into desired goals, outcomes, and feasibility of implementation. Beginning in 2018, a series of public workshops, presentations, informational sessions, and public hearings were held. Electronic communications with project updates, Ordinance drafts, and announcements for upcoming outreach events, workshops and hearings were sent to close to 35,000 individuals and organizations throughout the process. The Planning Newsletter also highlighted workshops and hearing dates along with the release of Ordinance drafts and hearings, and staff also notified Council District representatives of workshops and

hearings for additional inclusion in Council Office newsletters and electronic communications. Additionally, a [project website](#) was developed to share information about the Ordinance, process and timeline. During the comment period corresponding to the release of the revised draft Ordinance in April 2022 through the official comment period following the Public Hearing and ending August 22, 2022, the City received more than 1,800 comments, questions, and other public input. These comments ranged from strong support to strong opposition and represented private individuals, stakeholder groups, and technical experts. Comments took the form of individual messages; form letters; repeated communications from several groups and individuals; official letters of support or statements of opposition from stakeholder groups including residents, neighborhood councils, and environmental groups.

Altogether, the process described above represents multiple years of research and collaboration with key stakeholders, as well as City departments and other experts, that contributed to the creation of the City's proposed Wildlife Ordinance. The proposed Ordinance represents an iterative public process, which has taken into consideration the vast amount of comments and suggestions received. An initial draft of the Ordinance was released for public review and comment in Spring 2021. After taking into consideration public feedback that was received during the comment period, Planning released a revised draft of the Ordinance in Spring 2022. Additional public outreach was conducted and comments were received and evaluated during Summer 2022. The proposed Ordinance reflects alterations made in response to the feedback from community members, property owners, environmental advocates and City departments that share responsibility for implementation of the regulations.

## **WILDLIFE ORDINANCE OVERVIEW**

The proposed Ordinance regulations aim to balance human development with the need for wildlife habitat and connectivity, and are intended to be supplemental to other existing land use regulations and offer regulation for topics that have not been sufficiently covered through other zoning mechanisms. Proposed regulations would primarily apply to single family development within ecologically-significant areas of the city, and would largely address aspects of residential development that threaten or impede wildlife movement and habitats in highly vegetated and steeply sloped areas. The Ordinance aims to reduce cumulative development impacts on plants, animals and natural resources for supporting wildlife connectivity, while providing co-benefits related to biodiversity enhancement, climate resilience and public health.

### **Wildlife District Selection**

The Wildlife Ordinance will be added to the Los Angeles Municipal Code (LAMC) as a new Supplemental Use District referred to as the "Wildlife District" and will first apply to properties within the Santa Monica Mountains bound by Ventura Boulevard to the north, Sunset Boulevard to the south, the 101 Freeway to the east, and the 405 Freeway to the west. This area is known for the various canyons (such as Laurel Canyon), Bel Air and the "Hollywood Hills". This pilot District boundary was determined based on both recommendations from the consultant team, as well as consideration of geography and the regulatory framework. This pilot area spans more than 28,000 acres and contains more than 23,500 properties that are a mixture of large publicly-protected open space, as well as private properties zoned for single family housing, making it a

relevant location to pilot the proposed regulations before expanding them to other ecologically significant areas within the city. See figure 3 below.

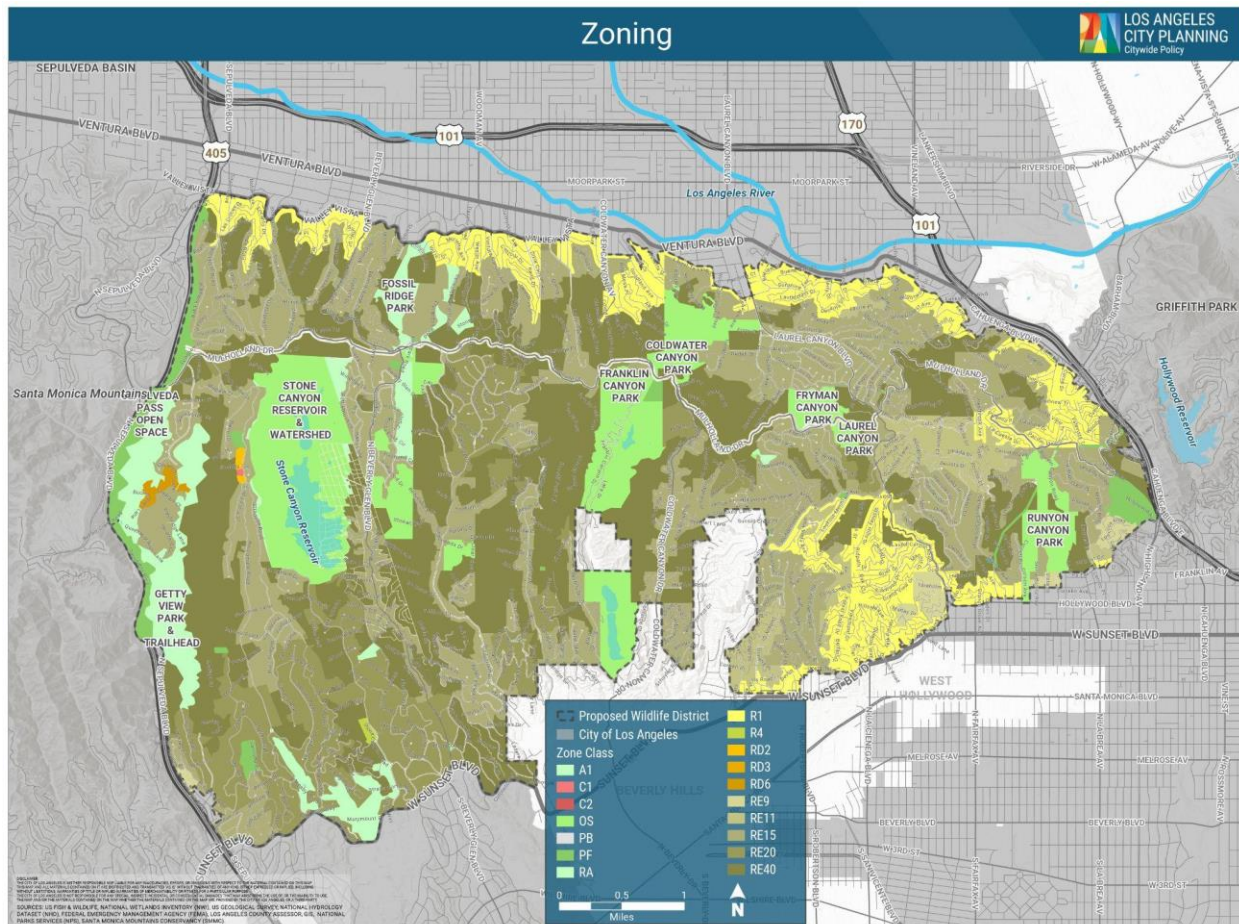


Figure 3. Proposed Wildlife District boundary and zoning, located in the Santa Monica Mountains within the City of Los Angeles, California.

This proposed Wildlife District is part of the Santa Monica Mountains Zone, and was initially identified as one of several Protection Areas for Wildlife (PAWs) by the team of consultants hired to identify resources in the city. The District's unique landform and hydrology contribute significantly to the biological and ecological value of the city by supporting critical habitat; sensitive natural plant communities; Special-Status species; linkages that facilitate wildlife movement; and areas important for preserving biodiversity. Due to this context, the District is a key stepping stone in the larger Santa Monica Mountain range and serves as an essential corridor for wildlife movement through the city and on a regional scale. (ESA, 2021)

By implementing the Ordinance first in this portion of the Santa Monica Mountains, the City can determine if these sets of regulations adequately achieve the goal of maintaining wildlife habitat and connectivity. Following the successful adoption and implementation of the Ordinance in the proposed District, the regulations are intended to be extended to other ecologically significant areas within the city, such as the proposed PAWs. See figure 4 below.



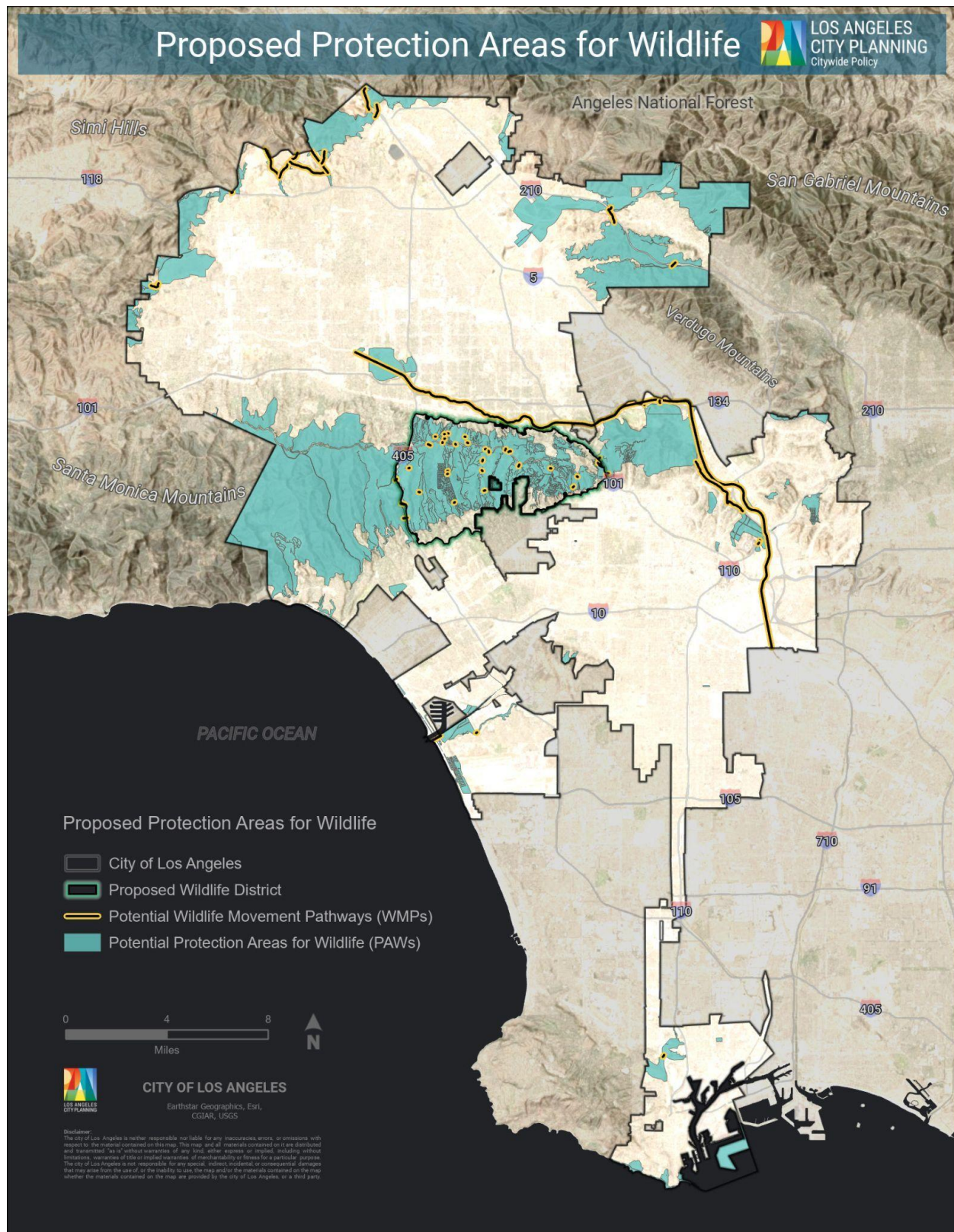


Figure 4. Proposed Wildlife District in proximity to other Protection Areas for Wildlife (PAWs) proposed throughout the City, as well as the surrounding mountains/hillsides in the region.

## **Proposed Regulations**

The proposed Ordinance includes regulations that apply to private properties within the Wildlife District, as well as requiring additional development review that applies to lots where natural resources (such as water features and/or undeveloped open spaces) are present or within close proximity. The regulations proposed in the Ordinance are intended to work holistically, to provide the strongest protection in areas that are the most ecologically significant and sensitive in the city. A summary of the proposed regulations is provided below.

### ***District-Wide Regulations***

The proposed Wildlife Ordinance contains provisions that apply to properties within the District pertaining to: grading; residential floor area; lot coverage; trees; vegetation and landscaping; fences and walls; lighting; windows; trash enclosures; and height. These regulations aim to 1) minimize land disturbance; 2) promote habitat and biodiversity; and 3) improve wildlife health and mobility.

**Minimizing Land Disturbance.** One of the primary approaches to protecting wildlife habitat and connectivity is to minimize the disturbance of land, including the alteration of landform (e.g., slopes, soils), hydrology and vegetation. The Ordinance aims to reduce land disturbance associated with residential development projects through the regulation of grading—especially on steep slopes—and by addressing Residential Floor Area (RFA) exemptions, as well as by including impermeable surfaces in the definition of Lot Coverage.

**Promoting Habitat and Biodiversity.** The Ordinance proposes District-wide standards related to trees, as well as vegetation and landscaping, with the intent of maintaining habitat and biodiversity, managing stormwater and sequestering carbon by retaining native and significant trees, and by incorporating native vegetation that supports wildlife by providing food and shelter.

**Improving Wildlife Health and Movement.** Standards for fencing, lighting, windows, trash enclosures, and height were developed with the aim to limit disturbance and hazards to wildlife, as well as human-wildlife conflicts, thus limiting injury to wildlife and improving wildlife movement and connectivity.

### ***Wildlife Resource Regulations***

Aside from the District-wide regulations summarized above, the Ordinance also proposes regulations that would apply to areas that have been identified as containing Wildlife Resources. The Ordinance defines Wildlife Resources as: “Features which provide wildlife benefits, ecosystem services, and contribute to the overall quality of the natural and built environment (...) and include: water features, such as lakes, reservoirs, ponds, wetlands, rivers, streams, creeks, and riparian areas; open space, including properties zoned Open Space, conservation easements, and protected areas; and open channels” (City of LA, 2022, p. 4). Buffers are proposed around certain Wildlife Resources to help avoid the disturbance of spaces wildlife need for habitat and mobility, and also help to address data constraints. Since development activity near waterways can still lead to their degradation and since many waterways in the District are ephemeral, a 50 foot buffer would be applied to water resources (such as rivers, streams, lakes, and wetlands) in order to protect important waterways and water bodies, and maintain overall watershed health. A

buffer of 15 feet would apply around open channels, which still provide water resources for wildlife but do not fluctuate and/or move locations (like naturalized ephemeral water resources). A 25 foot buffer would apply to open spaces to recognize that development proximate or abutting a resource can have an adverse impact. These buffer distances would help to ensure that properties that are in close proximity to water and open space resources are designed in a manner that preserves setbacks, vegetation, or otherwise maintains an unobstructed pathway for wildlife movement.

More information on the regulations proposed in the Wildlife Ordinance can be found in Appendix 1, as well as in the proposed Wildlife Ordinance (City of LA DCP, 2022) and Staff Recommendation Report for the City Planning Commission (Superfisky et al., 2022).

## **DISCUSSION**

The effort to create a Wildlife Ordinance within the City of LA exemplifies the shift that cities (and departments within cities) are making to more adequately address the state of the environment and manage urban ecosystems, which have largely been overlooked. More interest in maintaining urban tree canopies, protecting native plant and animal species and utilizing nature-based solutions to address problems associated with urbanization have helped to elevate and support the approach that has been advanced by the Wildlife Ordinance. The focus of the Wildlife Ordinance on addressing climate change, biodiversity, wildlife habitat and connectivity is unique, since planners are not often thought of as “land managers”, but within urban contexts, planning departments can play key roles in guiding land use decisions that impact the environment and if done more holistically can result in benefits to that environment. The novel approach that the Wildlife Ordinance is taking has also illuminated the need for additional education to further encourage people to recognize and understand the importance of addressing biodiversity and ecosystem health in a developed and urbanized context like LA. This placed a particular onus on Planning staff to include an educational component in the development of the proposed regulations, as well as to consider how to continue to advance that informational component beyond Ordinance adoption, such as through a website to collect and present information for property owners, including but not limited to, the Ordinance provisions; building permit and review procedures; native plants and landscape maintenance; and fire-safe resources.

The authority that planners have is limited, which makes it important to clearly convey to the public what a planning department can and cannot do to manage urban ecosystems. For example, many community members encouraged the incorporation of rodenticide bans and the creation of wildlife crossings into the Ordinance, as additional strategies to benefit wildlife habitat and connectivity. Although these are complementary strategies, planning departments have the ability to regulate land use, but do not have the authority to change or dictate management practices or build capital improvement projects. Partnerships with other departments and agencies will be needed to achieve these additional recommended strategies, since they do not fit within what a zoning ordinance or a planning department can do.

The process taken to develop the City’s proposed Wildlife Ordinance is also unique compared to other ordinances, which typically focus on consulting primarily with community residents that might be impacted by a proposed ordinance. The development of the proposed Wildlife Ordinance expanded outreach and engagement efforts to also include subject matter

experts, academic research, community science, and case studies and consultations with other agencies/jurisdictions, which ultimately yielded a more collaborative and informed ordinance as a result. The public was engaged in providing feedback throughout the process of developing the Ordinance, and the robust community feedback helped to shape the initial concepts for the Ordinance beginning in 2018, and helped inform two revisions of the Ordinance (based on public drafts released in May 2021 and April 2022). A variety of concerns were raised about the Ordinance and its proposed standards—by both opponents and supporters—which were taken into consideration by staff during the process of revising the draft standards. The most prevalent community concerns that were collected through workshops, meetings and informational sessions; public hearings; and approximately 1,800 comment emails and letters include: urgency to address environmental challenges; environmental justice and equity; public outreach and noticing; privacy and public safety; property values and development rights; rebuilding after a disaster; impacts of large developments; environmental analysis; and implementation challenges and costs. Taking into consideration and incorporating the wide range of public comments provided throughout the ordinance development process posed a challenge, as finding a way to balance conflicting community desires and expectations is difficult.

Data, while helpful in informing the development of the Ordinance regulations, presented additional challenges, especially related to the identification of natural resources. Planning staff and the consultant team identified, analyzed, and utilized the best available publicly-accessible data sources from credible sources. That stated, it is important to acknowledge that no dataset is comprehensive and that all come with imperfections and limitations, contributing to another key challenge of data constraints. Data collected over various time frames, at different times of year and at various scales (regional versus parcel specific) results in datasets that may appear to have omissions. Some data sets may be updated on a regular basis while others are updated on different timelines based on the agency that manages the dataset. As such, datasets vary in levels of precision. Additionally, most natural resource datasets are not created at the parcel-specific level that planners are used to working at, but rather, are broad-brushed strokes of information that illustrate generalizations on miles or acres of mapped area, making it challenging when analyzing land at the parcel-specific level.

When identifying where water resources occur within the District, for example, there was no single source that provided a comprehensive and completely accurate dataset that identifies all water sources within the City and the District. Some of this inconsistency and incompleteness is a result of the differing methodologies used to identify water by the different agencies and the differing scales at which data was collected and mapped by different agencies, but also stems from the ephemeral nature of streams and watercourses in southern California. Additionally, many different departments and agencies reference different maps of waterways. Having no single agreed upon data source currently in use by the City to identify water resources makes it difficult to identify water resources precisely. Therefore, Planning staff compiled accessible datasets related to water to create a composite water resources.

Changes in political leadership throughout the process of developing the Ordinance have also presented challenges, as City leaders and their associated priorities and focus areas shift, and champions of certain work programs term out of office, making it difficult to maintain political support and continuity for such an effort.



## CONCLUSION AND NEXT STEPS

At the time of publication of this article, the Wildlife Ordinance is not adopted or implemented within the City of LA, and is therefore still being “proposed”. The proposed Wildlife Ordinance passed a major milestone in December 2022 after it was reviewed and recommended for approval with minor revisions by the City Planning Commission (CPC). Based on CPC’s recommendation, the Ordinance will be presented to various City Council Committees (such as the Planning and Land Use Management Committee) prior to being presented to the full City Council for final determination as to whether the proposed land use regulations will be adopted and therefore subsequently implemented in the Wildlife District.

Planning staff will continue coordinating with other City departments (e.g., BOE, DBS, Department of Animal Services, Department of Public Works, RAP, LAFD, LASAN, and UFD) to discuss wildlife habitat and connectivity objectives and determine how departments can better collaborate to promote conservation, as well as determine where conflicting objectives may occur in order to find shared solutions. To ensure the successful implementation and enforcement of the Ordinance, additional City personnel will be needed, including but not limited to UFD staff, biological/ecological trained specialists for Planning and DBS as well as additional project review staff for those departments. Additionally, ongoing maintenance and updating of data and mapping is essential for the proper identification of resources. It is recommended that procedures be developed to ensure future mapping of resources, so that existing datasets can be regularly updated, and that information be shared between City departments to support implementation and enforcement of regulations related to resources. This effort would need to be added to the City’s future work programs for multiple departments to collaborate on data collection and maintenance. Should this work program remain a priority for the City, future annual budgeting will need to be allocated to support such efforts.

Following the anticipated adoption, staff plan to conduct an evaluation of the success of the Ordinance in achieving its objectives within the pilot study area of the Wildlife District. It is also envisioned that, if effective within the initial study area, Ordinance regulations will be expanded to other ecologically significant areas within LA. A separate zone change ordinance would need to be prepared and approved by the City Council in order for the District and associated regulations to be applied to additional geographies. Future application of the Ordinance could also happen through the Community Plan update process. Any future application of the Ordinance would necessitate additional public engagement, including formal noticing requirements associated with zone changes.

Sharing the process and approach that the City of LA aims to use to manage private property within the city in a way that allows urban development without loss of wildlife habitat and connectivity will hopefully encourage other municipalities, counties, agencies, and jurisdictions to also consider how land use regulations can be used as key strategies to manage complex urban ecosystems. Although there are significant challenges associated with this approach, it is still a meaningful stride forward towards regulating projects on private property to complement efforts being taken to protect open space/natural areas, ensuring that wildlife habitat and connectivity is maintained across the city and region.

## APPENDIX 1: CITY OF LA’S WILDLIFE ORDINANCE OVERVIEW

The sections below are excerpts from the proposed Wildlife Ordinance and associated Staff Recommendations Report for the City Planning Commission, which provide an overview of the regulations proposed in the Wildlife Ordinance and when and where they would be applied. More information can be found by referencing the proposed Wildlife Ordinance (City of LA DCP, 2022) and the Staff Recommendation Report (Superfisky et al., 2022).

### **Ordinance Applicability**

The varying topographical features of the hillsides, irregularity of lots and the constraints of steeply sloped terrain dictate that one size and solution does not fit all. For this reason, the regulations proposed have been developed to integrate with existing regulations to provide the greatest protections for habitat preservation and connectivity potential. Proposed regulations would apply to the following types of Projects or development activities: 1) New Construction, 2) Additions, 3) Major Remodel- Hillside, 4) Grading and 5) Tree Removal. When an applicable development Project is proposed in the District, it will be reviewed for compliance with the Ordinance development standards. If a Project is proposed within an identified Wildlife Resource Area/Buffer, or if it meets additional criteria, as provided in the Ordinance regulations, it will be subject to additional development standards and review procedures, such as Biological Assessment and Site Plan Review.

### **Proposed District-Wide Regulations**

The following sections summarize the proposed District-wide regulations by grouping the regulations by general intent: minimizing land disturbance; promoting habitat and biodiversity; and improving wildlife health and movement.

#### ***Minimizing Land Disturbance***

One of the primary approaches to protecting wildlife habitat and connectivity is to minimize the disturbance of land, including the alteration of landform (e.g., slopes, soils), hydrology and vegetation. The Ordinance aims to reduce land disturbance associated with residential development projects through the regulation of grading—especially on steep slopes—and by addressing Residential Floor Area (RFA) exemptions and including impermeable surfaces in the definition of Lot Coverage.

**Grading.** The intent of addressing grading standards is to preserve natural landform, topography, and vegetation; retain watershed function; and reduce surface erosion, soil instability, landslides, and/or site disturbance by limiting grading on steep slopes. Current hillside grading standards in the city vary according to zones and overlays, and are primarily implemented by the DBS. One type of grading activity that is exempted from the calculation of overall grading allowed on a site is Remedial Grading, which is defined by the City as grading that is “necessary to mitigate a geologic or geotechnical hazard on a site,” including but not limited to seismically unstable soils, slope instability, grading to bring existing non-conforming steep slopes into conformance, and grading for access driveways (City of LA LAMC §12.03, 2022). Because Remedial Grading quantities are exempt from maximum by-right quantities, and therefore handled in a ministerial manner without discretionary review, the outcome may result

in high amounts of grading on sites that are the least suitable for development without protections or mitigations afforded through discretionary review.

The Ordinance proposes to require Site Plan Review for any project exceeding 1,000 cubic yards of Remedial Grading resulting in more discretionary review of grading projects whether they are remedial or not. Added to this, the Ordinance proposes to count Remedial Grading on slopes of 60% or more toward the by-right maximum grading quantity established in the existing Baseline Hillside Ordinance (BHO). Together, these two proposed regulations would help to address the issue that Remedial Grading is not otherwise limited in volume/quantity, nor is it subject to discretionary review. On the steepest slopes, the proposed regulations would not allow new structures to be sited on any portion of a lot where slopes are equal to or exceed 100% slope. This regulation works to ensure that any earthmoving activities and vegetation removal that are conducted in association with development would only be done to the extent necessary to accommodate proposed structures and in a manner that will not cause excessive surface water runoff, erosion, sedimentation or vegetation loss. Finally, to preserve existing landforms and minimize land disturbance, the Ordinance proposes removing two activities that are currently exempted from the maximum by-right limits introduced by the BHO: cut and/or fill for driveways and under building footprints, and fill resulting from cut underneath the footprint of the main building. The result is these activities would be counted toward the overall maximum allowable grading for a site, and proposed grading amounts above the maximums would be subject to discretionary review.

**Residential Floor Area.** The Ordinance proposes regulations to address how large a structure can be built or RFA to minimize the disturbance to and alteration of Wildlife Resources (defined and described below), slopes, vegetation, and undeveloped areas that provide wildlife habitat and connectivity by retaining existing vegetation and natural landforms. Residentially zoned properties have current limits on the total allowable RFA permitted on a lot. Current BHO regulations exempt both basements and required covered parking in the calculations of RFA, which in the hillsides can represent 1000s of square feet of development thich are not currently reviewed for impacts to wildlife or the environment. These activities contribute to land disturbance, and their exclusion from the calculation of RFA results in larger homes than would otherwise be permitted. The construction of basements, which requires significant amounts of grading, soil removal, and landform alteration, has a considerable effect on the natural environment, and exempting basements from the calculation of RFA has led to larger housing construction, which is not evaluated in its totality due to those exemptions. In some cases, such as when a house terraces or ‘cascades’ down a slope, basements that are part of the development occupy significant space and span multiple levels, requiring considerable landform alteration and earth removal to construct. In response to these environmental concerns, the Ordinance proposes to include basements in the calculation of RFA as it was previously calculated, prior to the BHO revisions which added those exemptions.

**Lot Coverage.** Currently, calculation of Lot Coverage in the BHO accounts only for the building footprint of a primary structure and does not account for accessory structures, decks, pools, sports courts, driveways, or other hardscape features. This current method of calculating Lot Coverage contributes to the overall increase of impervious surface area. The proposed Ordinance would expand the Lot Coverage definition to include the area of a parcel covered by:

any structures extending more than six feet above grade, pools, planters, sports courts, pavement, patios, decks. The coverage of such features, combined with the coverage of buildings, would be limited to a maximum of 50% of lot area. The Ordinance also proposes a cap of 100,000 square feet of Lot Coverage for properties within the District, which aims to limit future paving and hardscape to improve stormwater management, limit erosion, and preserve natural landscapes and vegetation in the District.

### ***Promoting Habitat and Biodiversity***

The Ordinance proposes District-wide standards related to trees, as well as vegetation and landscaping, with the intent of maintaining habitat and biodiversity, managing stormwater and sequestering carbon by retaining Native and Significant Trees, and by incorporating native vegetation that supports wildlife by providing food and shelter. Native plants provide other ecosystem services, such as stabilizing soils on hillsides/slopes, providing tree canopy, sequestering carbon, filtering pollutants from and slowing stormwater runoff, increasing permeability, and reducing temperatures, among many other ecological and societal benefits (ESA, 2021). Although many types of vegetation can provide such ecosystem services, native plants in particular have evolved with local native wildlife species and provide habitat and resources to animals existing in the city and region, and require less water and maintenance than non-native landscaping plants (ESA, 2021).

**Trees.** The Ordinance proposes supplementary regulations in addition to the City's Protected Tree Ordinance (PTO) requirements to preserve native and rare species that are difficult to replace. The PTO is an existing set of regulations which have not been implemented evenly because tree removal has not triggered building permit review. Those rules are supplemented by additional requirements to regulate tree removal as a project as well as expanding the type of trees subject to protections to include mature trees beyond those recognized in the PTO. Below is an excerpt of the proposed tree regulations:

*Native Tree Requirement* - One tree (of a minimum size of 15 gallons) would be required to be planted on site for every 1,000 square feet of new floor area introduced to the lot, with a minimum of one (1) Native Tree required. This provision acts as an incentive to retain on site native trees which would be counted towards this requirement.

*Significant Tree Removal, Relocation, and Replacement* - The Ordinance proposes to expand the PTO protections in the District to also include Significant Trees, which are categorized as any tree measuring 12 inches or more in diameter or more than 35 feet in height. Any Significant Tree that is removed or relocated would be required to be replaced by two (2) new trees (of a minimum size of 15 gallons) selected from the Preferred Plant List. The definition and inclusion of Significant Trees in the Ordinance acknowledges that large, mature trees of all types provide habitat benefits including shelter for wildlife, as well as important ecosystem services for people (ESA, 2021).

*Significant Tree and Protected Tree or Shrub Dripline limitations* - No Project related grading or construction activity would be allowed within the Dripline of a Significant Tree or Protected Tree or Shrub, in an effort to minimize the negative impact that construction activities have on trees and the root systems that sustain and anchor them.



*Treatment of Dead or Fallen Trees* - Any dead or fallen tree which is identified by a Tree Expert in a Tree Report of a Protected Tree or Shrub species would be required to be replaced per the Significant Tree replacement ratio of 2:1. Dead trees provide habitat value to many wildlife, making it important to retain rather than remove, from properties (ESA, 2021).

*Emergency Removal* - Emergency removal would continue to be allowed if a visual inspection by LAFD determines removal is necessary due to a hazardous or dangerous condition (e.g., disease, potential for spreading pest and pathogen infestation to other trees, blocking public roadways, etc.).

**Vegetation and Landscaping.** New Construction, Major Remodel-Hillside and Grading Projects would be subject to the Vegetation and Landscaping standards in the Ordinance. The proposed Vegetation and Landscaping standards were created to be consistent with State of California, LA County and LAFD brush management protocols, which aim to regulate the size and location of vegetation in particular “Zones” around structures. The Ordinance does not address or alter brush management protocol, but rather, aims to regulate the type of vegetation being incorporated into properties—promoting the reduction of invasive plant species and the incorporation of native plant species to provide wildlife habitat and benefit. Below is an excerpt of the proposed Vegetation and Landscaping regulations:

*Planting Zones* - Vegetation and Landscaping standards proposed in the Ordinance are developed to be specifically aligned with existing Brush Clearance Zones. In Zone 1 (which extends 30’ from a structure), a minimum of 50% of the total area of any new landscaping would be required to be planted with native species chosen from among the species listed in the Preferred Plant List (which is described below). A minimum of 75% of the total area of any new landscaping in Zone 2 (which extends from the edge of Zone 1 to the property line) would be required to be planted with native species chosen from among the species listed in the Preferred Plant List. These native plant coverage percentages ensure that newly landscaped areas incorporate the most beneficial plant species that are adapted to LA’s climate and support the wildlife in the City and region.

*Prohibited Plants* - To reduce the spread of invasive plant species and risk of brush fires in the hillsides, the Ordinance proposes a list of plants that are prohibited for use within the District on newly landscaped properties. A list of Prohibited Plants was developed for the Ordinance, and is composed of species identified by the California Invasive Species Plant Council (Cal-IPC) as having moderate to highly invasive characteristics.

*Plant Lists* - Both the Prohibited and Preferred Plant Lists associated with the Ordinance are synthesized from existing vetted plant lists within the region—including lists of plants from the California Native Plant Society, the City of Malibu, the City of Santa Monica, the California Invasive Plant Council (Cal-IPC), among others—as well as Plant Lists currently being used by the City of LA, such as the Mulholland Specific Plan. Once the synthesis of these lists occurred, the lists were then reviewed by internal City of LA landscape architects and the biodiversity

team, as well as external botanists, horticulturalists, and landscape architects to provide feedback that then resulted in the Preferred and Prohibited Plant Lists.

### ***Improving Wildlife Health and Movement***

Standards for fencing, lighting, windows and trash enclosures aim to limit disturbance and hazards to wildlife, as well as human-wildlife conflicts, thus limiting injury to wildlife and improving wildlife movement and connectivity.

**Fences and Walls.** The intent of regulating fences and walls is to minimize potential for wildlife injury and entrapment by prohibiting materials and design features that present threats to wildlife and as well as to limit the introduction of new barriers to wildlife movement in the District due to the design, configuration, and/or location of fences and walls. Early regulations proposed to regulate fence location and require fence permeability to facilitate wildlife movement and separate buildings with larger setbacks, also addressing fire considerations. After receiving extensive feedback and concerns from property owners on permeable fencing design standards and location requirements the fence regulations are now proposed to only prohibit specific materials and design features that are harmful to wildlife, such as barbed wire, plastic mesh, concertina wire, razor wire, spikes, sharp glass, and uncapped hollow fence posts.

**Lighting.** Lighting, and light pollution, can have significant negative impacts on wildlife, such as disorienting nocturnal species, and disruption of mating, feeding, migrating, and predator-prey balance (ESA, 2021). To minimize the impacts to wildlife created by outdoor lighting, the Ordinance proposes additional lighting regulations including regulating the height (with a maximum of 20 feet or no higher than the height of a fence or structure for affixed lighting and a maximum of two feet for freestanding lighting) and design of outdoor lighting, as well as establishing new lighting maximums of 800 lumens per luminaire and 2,600 lumens for security lighting and outdoor recreational lighting. These lighting standards would result in better nocturnal habitats for wildlife, which would lead to healthier ecosystems and a better, healthier environment within the District.

**Windows.** Windows, doors, and large expanses of uninterrupted glass can be harmful, or even lethal, for birds (ESA, 2021). To improve avian safety and reduce avian injuries and death, the Ordinance proposes to restrict large expanses of reflective and transparent windows. For new development, expanses of glass exceeding 40 square feet would be required to incorporate at least one of five features to promote avian safety, including: fritted glass; angled glass (recommended minimum of 20 degrees); UV reflective glass; frosted, stenciled, etched, or sandblasted windows (with recommended pattern dimensions of at least 1/8 inch wide and at maximum spacing of 4 inches, and horizontal elements at least 1/8 inch wide and at a maximum spacing of 2 inches); and architectural features (such as overhangs, louvers, awnings, screens, or other elements that layer, recess, or otherwise visually break up large expanses of reflective or transparent surfaces into segments smaller than 24 square feet).

**Trash Enclosures.** Improperly secured or poorly designed trash enclosures can present hazards for wildlife, and can lead to unwanted occurrences of human-wildlife interaction (ESA, 2021). The Ordinance proposes design standards to restrict access to unsecured trash, by identifying acceptable and prohibited materials (such as flammable materials like wood), and

establishing design standards for trash enclosures that will help minimize attractive nuisances for wildlife (such as being stored inside a building or within an enclosed structure).

**Height.** There are two primary issues that height regulations seek to address in the Wildlife Ordinance: 1) reducing the height of structures to reduce the prevalence of inadvertent bird strikes, and 2) limiting the overall height of structures so as to reduce the amount of grading and landform alteration required to construct cascading, or terraced structures. As such, an overall height limit of 45 feet is proposed for all buildings and structures within the Wildlife District, excluding remodels and rebuilds after a disaster.

### **Proposed Wildlife Resource Regulations**

One of the goals of the Ordinance is to protect natural resources for wildlife habitat and movement. In addition to the District-wide standards described above, the Ordinance also contains a set of regulations focused on protecting the natural resources that are known for being critical components of local wildlife habitats. The proposed regulations intend to protect Wildlife Resources that provide wildlife habitat and connectivity opportunities by buffering from waterways and open spaces and limiting disturbance to soils, waterways, vegetation, and habitat areas.

#### ***Wildlife Resources and Buffers Requirements***

The Ordinance defines Wildlife Resources as: “Features which provide wildlife benefits, ecosystem services, and contribute to the overall quality of the natural and built environment (...) and include: water features, such as lakes, reservoirs, ponds, wetlands, rivers, streams, creeks, and riparian areas; open space, including properties zoned Open Space, conservation easements, and protected areas; and open channels” (Wildlife Ordinance, 2022, p. 4). The Ordinance proposes buffers around certain Resources to help avoid the disturbance of spaces wildlife need for habitat and mobility, and also help to address data constraints. Specifically, Resource Buffers serve to: limit disturbance to soils, waterways, vegetation and habitat areas and reduce the impacts of projects on waterways; improve wildlife connectivity opportunities along waterways and between and through open, undeveloped spaces; and retain open space land for recreational and educational opportunities.

Since development activity near waterways can still lead to their degradation and since many waterways in the District are ephemeral, a 50 foot buffer would apply to water Resource datasets (such as rivers, streams, lakes, and wetlands) in order to protect important waterways and water bodies, and maintain overall watershed health. A buffer of 15 feet would apply around open channels, which still provide water resources for wildlife but do not fluctuate and/or move locations (like naturalized ephemeral water resources) so do not require as large of a buffer. A 25 foot buffer would apply to open spaces to recognize that development proximate or abutting a resource can have an adverse impact. This buffer distance would also ensure that properties that are in close proximity to these habitat patches and have the potential to impact wildlife connections to open space areas are designed in a manner that preserves setbacks, vegetation, or otherwise maintains an unobstructed pathway for wildlife movement. Although larger buffer sizes would achieve greater ecosystem benefits, sizes had to be reduced in this urban ecosystem context to avoid deeming properties undevelopable (which could be considered a “taking”).

The regulations associated with Resources flag a parcel in proximity to Resources and require discretionary review (through a Biological Assessment and, subsequently, Site Plan Review). This approach requires a Qualified Biologist to go to a Project site, perform a detailed mapping and analysis of the resources present on the site to provide a more accurate description and assessment of the Resources that are present on that site, and the potential impact that Project will have on those Resources, and ultimately address wildlife habitat and connectivity.

Regulations pertaining to setbacks, ridgelines and locational fence standards were proposed in former drafts of the Ordinance and were removed in the latest version of the proposed Ordinance, but could still be worth considering in the expansion of the regulations to other parts of the city, and for inclusion in ordinances by other jurisdictions that aim to address wildlife habitat and connectivity.

### **Proposed Wildlife Ordinance Implementation and Enforcement**

Upon adoption, the Ordinance would only apply to Projects that are filed after the effectuation date of the Ordinance. The Ordinance would not apply retroactively, so Projects that were either completed, in progress, or filed and approved by the effectuation date would not need to comply with the proposed regulations.

#### ***Implementation - Ministerial Projects***

Ministerial or by-right Projects that are subject to the Ordinance will be reviewed either by DBS, UFD, or Planning depending on the scope of work. Currently, projects are evaluated for compliance with existing zoning regulations by these entities, and the Ordinance does not propose to change these processes for review. Planning would review Ministerial Projects for District-wide standards and provide an Administrative Clearance for projects that satisfy the applicable Ordinance requirements.

#### ***Implementation - Discretionary Projects***

While the District-wide regulations contained in the Ordinance are proposed to be reviewed ministerially, projects exceeding a certain size or scope, as well as those proposed within identified Resources or Resource Buffers, would be subject to Site Plan Review, which is a discretionary review process. The proposed Ordinance indicates the following types of Projects would require a Site Plan Review:

- any Project that involves 1,000 cubic yards or more of Remedial Grading,
- any Project that creates or results in 7,500 square feet or more of new Residential Floor Area (RFA), and/or
- any Project proposed within an identified Wildlife Resource or its Buffer (requires Biological Assessment first).

Site Plan Review is used to “control or mitigate the development of projects which are likely to have a significant adverse effect on the environment” (City of LA LAMC § 16.05, 2022). Findings must be prepared to indicate that the Project will not have unavoidable adverse impacts on the environment, including identified Wildlife Resources. In addition to the findings that must be made for all Projects evaluated through Site Plan Review, the Ordinance proposes



additional, supplemental findings related to the specific concerns of the Ordinance that also must be made in order for a Project to be approved. The Site Plan Review process allows Projects to meet the intent of a regulation through consistency with findings, and affords the City an opportunity to take a closer look at Projects that have a higher probability of having impacts on Wildlife Resources and wildlife connectivity.

### ***Enforcement***

The regulations and procedures for review proposed in the Ordinance were developed with implementation and enforcement as key considerations. District-wide regulations are ministerial in nature, and Project applicants would be able to demonstrate compliance with the regulations through a checklist that would identify where information is contained on plan sets that are reviewed through the plan check process.

Following adoption of the Ordinance, additional administrative materials would be created to assist Project applicants with submittal requirements (such as plot plans, biological assessments, landscape plans or tree reports).

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