

## LA Landscape and Site Design Ordinance Comments

The intent to support the provision of additional on-site open space to encourage Outdoor Amenity Areas does address the need to provide shaded and functional outdoor areas. Already the ordinance is removing barriers by not counting these structures as counting towards floor area.

But when these outdoor amenity areas are used in required front, side and rear yards, they should not have equal points with green, living trees and landscape. What do these two have in common: they have shade in common, but trees provide groundwater recharge, oxygen, habitat, biodiversity, stormwater retention and cleaning, cooling, absorb carbon, reduction in urban heat island effect and mitigate climate change. Outdoor Amenity areas, if given the same point ranking should address ALL of the same benefits. How can we compare the two when we look at the benefits comparison? The cons are that landscape requires water, and maintenance more frequently than a built structure. This is one of the major concerns in the point system.

Since the Landscape Ordinance is being removed and incorporated into the new ordinance, I've looked at how it has someone become subordinate to the built environment. There should be a separate point system for both the site design and the landscape so that both are valued but not one or the other.

Perhaps not just requiring a minimum of eight Health Related Standards, ALSO requiring a minimum of some number of landscape standards.

### NOTES on the DRAFT Ordinance

Sec. 6. Subdivision 25 of Subsection A of section 12/21 of Article 2 of Chapter 1

P. 9

Specifically Figure 4 and Figure 5 show a reduction in landscape area in the required setback areas.

p. 13

(2) please add that common open space areas can also include planters and planting.

p. 14

Section 10. 20. Projection into Yards. (e) There is a limit of 6 feet projection into the yard, but no limit on percentage of frontage. So that a porch that runs the whole front of a building could remove a significant amount of landscaping, as well as along a sideyard (which could take up the WHOLE sideyard). This is a concern that limits the already limited landscape requirement.

P 15

Section 12. 25 (f) Menu of Incentives are disincentives for landscape. 20% decrease of width or depth with landscape points that are not specifically called out. The combination in the point system decreases the landscape and this 20% decrease further decreases the landscaped area. Why?? **This section should set a threshold for incentives to be available.**

(f) Menu of Incentives Sections 1) Yard/setback, 2) lot coverage, 3) Lot width, 6) Open space should only allow one of these incentives and a limit to the total reduction in landscape/open space (I'm opposed to all of them, but not allowing a combination). The point system should do a study of how much green space will be lost with these incentives, which incentivize the developer not the resident. This reduction reduces biodiversity, groundwater recharge, and increases the heat island effect.

Also on this section where are the numbered sections, 4 and 5???

p. 17

12.40. A. 3) The point system needs to address stormwater capture, groundwater recharge, soil health and conservation which are not incentivized in the point system

A. 5) Tree canopy is addressed, but more than tree canopy supports biodiversity, year-long habitat and this area seems to have been reduced and not increased or encouraged.

p.23

Recommend that the landscape management plan include an as-built from the contractor.

p.24

Sec. 18 F. Development Regulations. 2. (i) 3. Recommend adding plants shall be hydrozoned and irrigated appropriately.

p. 25

Section 19. F. 1. Why has this section of the original Landscape Ordinance, that addresses heat and glare of parking lots no longer included? It should be included.

*2. Vehicular Use Areas. (Amended by Ord. No. 173,268, Eff. 7/1/00, Oper. 7/1/00.)  
Notwithstanding any other provisions of this Code to the contrary, applications for landscape approval shall contain a proposal for heat and glare reduction in vehicular use areas in accordance with guidelines established by the City Planning Commission*

p.25

Section 20 A.13. 1) This section actually indicates a threshold for incentives. It should have justification based upon the balance of biodiversity, stormwater, groundwater, recharge, and other nature-based solutions and incentives.

p. 28

Section 23 91.7012.1 General. Recommend adding Hillsides shall not be planted with a monolith plant species, plants with varying root depths appropriate to slope solar orientation and soil preservation, shall be chosen.

Also, why was this section from the original Landscape Ordinance eliminated?

*D. Soil and Watershed Conservation. 1. Purpose. To conserve the unique character of the City which is largely determined by its landforms; and to encourage the restoration of such native areas as are unavoidably disturbed by development; to conserve soil and accumulated organic litter and reduce erosion by utilization of a variety of methods; and to increase residence time of precipitation in the watershed, the following regulations shall apply.*

*2. General Regulations. D (c) The Director shall take measures to ensure that the planting of slopes shall take into consideration such factors as degree of slope, slope orientation, type of soil, rooting depth of plants, fire dangers, availability of water, original native communities, depth of soil, and other relevant design factors.*

Where are these sections and their consequent benefits in the new ordinance?

#### *Section.42*

##### *A conservation of energy*

*2. Tree Planting. (Amended by Ord. No. 173,268, Eff. 7/1/00, Oper. 7/1/00.) Applications for landscape approval shall contain a proposal for shading of walls of structures in accordance with the guidelines established by the City Planning Commission.*

##### *B. Air quality Enhancement*

*1. Purpose. To ensure coordination between landscape and other features of the urban environment and to contribute to the processes of oxygen regeneration, clearing the air of harmful pollutants, and removal of air-borne particulates, the following regulations shall apply.*

*2. Procedure. (Amended by Ord. No. 173,268, Eff. 7/1/00, Oper. 7/1/00.) Applications for landscape approval shall contain a proposal for air quality enhancement, in accordance with the guidelines established by the City Planning Commission.*

#### NOTES and COMMENTS on the Point system

My greatest concern is that the combination of the site design cannibalized the landscape requirements in order to provide incentives for the design. If they are separated, there isn't one or the other, which is what is happening in the combination. BOTH are extremely important.

These are questions on the points "awarded" to items and the totals required.

1.1 **Pedestrian circulation**, Required points, 3. Total points Available 12, no landscape, biodiversity or soil conservation points .

1.2 **1.2 Quality Public Space Linkages** Total points available 12, Landscape, biodiversity or soil points ,4 points available, 1 (which is shared not a sure landscape point),

**Comment: Require mitigated trees to be planted within a certain radius of the site to focus equity and justice to areas with heat stress indicators**

2.1 **Site Context.** Required points, 3. Points available, 10. Landscape, biodiversity or soil points,

a. Why is this a point? This is a requirement! I believe b. deserves a point, but why a.?

c. Shouldn't 2 and 3, open space and the Landscape buffer have more weight? It addresses more of the conservation and human health issues than the location of parking, etc?

2.2 **Screened or reduced Vehicle Parking .** Required points, 3. Points available, 16. Landscape, biodiversity or soil points, **POSSIBLY 1!** There are multiple points given for different strategies, of which shade, stormwater retentions, groundwater recharge, and biodiversity are not addressed!

3.1 **Climate Resilient Buildings.** Required points, 3. Points available, 14. Landscape, biodiversity or soil points, Possibly 6

3.2. **Site Amenities.** Required points, 3. Points available, 5. Landscape, biodiversity or soil points, Possibly 5 (Possibly 3 mandatory points)

3.3 **Conservation** Required points, 3. Points available, 12. Landscape, biodiversity or soil points, Possibly 10 (3 mandatory points)

**Comment: With g. Native soil conservation during construction, the soil should be covered and protected from the elements, this is also a particulate matter concern, and is important in stockpiling and protect a non renewable natural resource!**

3.4 **Healthy Soil and Water Quality** Required points, 3. Points available, 10. Landscape, biodiversity or soil points, Possibly 9 (3 mandatory points)

3.5 **Biodiversity and Habitat Required** points, 3. Points available, 9. Landscape, biodiversity or soil points, Possibly 8 (4 mandatory points)

**Question:**

**How many times can a tree be part of a point system?**

**Where are there social justice points? The freeway choice of green buffer should be a social justice point or a well-being point.**

**The natural solutions should score higher, for the reasons stated. If we encourage more built environment, we should require a balance, people and nature first**

Thank you,

Stephanie Landregan, FASLA

[slandreg@unex.ucla.edu](mailto:slandreg@unex.ucla.edu)

cell:818.967.8095

