

SANTA MONICA MOUNTAINS CONSERVANCY

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February 24, 2014

Ms. Catalina Hernandez
City of Los Angeles, Department of Public Works
Bureau of Engineering
1149 S Broadway, Suite 600
Los Angeles, CA 90015

Item 9(a) Draft Letter
Proposed Citywide Cat Program Ordinance, City of Los Angeles
Initial Study/Mitigated Negative Declaration, w.O E1907610

Dear Ms. Hernandez:

The Santa Monica Mountains Conservancy (Conservancy), in conjunction with our joint powers authority, the Mountains Recreation and Conservation Authority (MRCA), owns or is responsible for the maintenance of over 69,000 acres of parkland and public open space in wild and urban-adjacent areas. Many of these acres fall within, or lie adjacent to, the boundaries of the City of Los Angeles. If the proposed Citywide Cat Program were to go into effect, the resulting increase in feral cat populations would significantly adversely impact the native wildlife and habitat quality of this public land.

Comprehensive comments on the subject proposal have been submitted the Baldwin Hills Conservancy (November 1, 2013), the California Department of Fish and Wildlife (November 4, 2013), and the U.S. Fish and Wildlife Service (FWS-LA-14-B-0023-14TA0020). The Conservancy supports the comments by these agencies, and we incorporate those letters by reference in our own comments.

The biological mitigation measures included in the Initial Study and Mitigated Negative Declaration (MND) would have little, if any, affect toward protecting biological resources. Mitigation measure BIO-1 would prohibit feeding within one mile of "Environmentally Sensitive Areas", however, besides the numerous exceptions listed, the definition of an Environmentally Sensitive Area (ESA) is inadequate. The MND fails to include any of the Conservancy or MRCA-owned public parkland, public open space, or network of privately protected open space within the Santa Monica Mountains under its limited list of ESA's. The MND is deficient for these omissions.

The Conservancy recommends that all public parkland, publicly-owned open space, and privately-owned land protected under a conservation easement be included in the list of

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ESA's under the subject program. The Conservancy also supports the recommendations of the above-mentioned public agencies.

Please address any future correspondence related to this project to Paul Edelman of our staff at the above address or by phone at (310) 589-3200 ext. 128. Thank you for your consideration.

Sincerely,

LINDA PARKS
Chairperson

Attachments: A - "Outdoors in Los Angeles" Map of Parkland within Conservancy Zone