

SANTA MONICA MOUNTAINS CONSERVANCY

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December 14, 2015

Diana Kitching
City of Los Angeles
Department of City Planning
Environmental Analysis Section
200 N. Spring Street, Room 750
Los Angeles, California 90012.

**Abode at Glassell Park Project
Notice of Preparation Comments
ENV-2015-2354 EIR**

Dear Ms. Kitching:

The Santa Monica Mountains Conservancy offers the following comments on the most environmentally impacting project proposed in the North East Los Angeles hilltop areas in the last twenty-five years. The natural lands complex south of the 134 freeway between the Los Angeles River and the Arroyo Seco currently possesses sufficient area and connectivity to support a small bobcat population along with numerous other mammals and birds. The Mountains Recreation and Conservation Authority (MRCA) owns protected portions of three of these habitat blocks in the Mount Washington area. The MRCA also owns several small protected lots in Glassell Park west of the subject property.

The ecological capacity of this natural lands complex comes about from a series of variably connected habitat blocks. Crossing some streets, animals make their way into the lands complex from either the Los Angeles River, the Arroyo Seco, and less likely from the San Rafael Hills just north of the 134 freeway. The potential animal travel route into the lands complex have not been adequately studied or documented. The most probable animal travel routes between the array of habitat blocks in the lands complex have also not been adequately studied or documented. Whether resident or itinerant to the Walnut Canyon habitat block occupied by the subject proposed project, bobcats use the habitat. Generally if a top level predator such as bobcats use an area, it will be used or occupied by a wide range of other native mammals including coyotes, ground squirrels, striped skunks, racoons, and cottontail rabbits.

A broad view of the natural lands complex shows several large habitat blocks in Glassell

Park located west and northwest of the subject Walnut Canyon habitat block. A tight line of homes loads up Cazador Street and parallel street systems directly east of the Walnut Canyon habitat block. These multiple lines of homes decrease the probability for successful and frequent north-south wildlife movement west of the habitat block. The most obvious open wildlife movement route between the Walnut Canyon habitat block and the described habitat blocks to the northwest appears to be at the intersection of Cazador Street, Loveland Drive, and Brilliant Way. Secondly the habitat band between Sundown Drive and Brilliant Way shows potential for wildlife movement. The bottom line appears that the subject development area functions as the key wildlife movement hub between all natural land in the lands complex north of the Walnut Canyon habitat block and all natural land to the south. Sufficient adverse impacts to this connectivity would constitute a significant biological impact that probably cannot be mitigated.

The Draft Environmental Impact Report (DEIR) must address this connectivity scenario and the potential habitat connectivity impacts of the proposed project and each of its DEIR alternatives. The DEIR must address the potential systemwide adverse impacts of degrading or severing this connectivity on the carrying capacity of all mammal species present in the natural lands complex south of the 134 freeway and between the Los Angeles River and the Arroyo Seco. The DEIR must include project alternatives designed to guarantee such habitat connectivity through the site. Such connectivity can only be deemed permanent with deeded interest in land to a public agency or acceptable non-profit organization.

The DEIR must also include project alternatives designed to maximize habitat protection with the subject 32 lots. The DEIR must analyze what are the highest quality habitat sections within the subject four acres that should be permanently protected to assure some wildlife resources within the 32 lots other than narrow swaths set aside for wildlife movement. To achieve such availability of wildlife resources, some portion of the 32 lots must be 100 percent free from any brush clearance requirements from both existing homes and the proposed homes.

If it is documented that protected native trees were cut down without City approval, then the potential for a ten year moratorium on onsite development looms. A public benefit - ecologically sustainable development alternative would also include the provision of the same trail connections through the property that are now used by the public. Any lands where walnut tree planting mitigation occurs must be protected by a deeded interest to a public agency.

Because it is public record what the applicant's paid for the 32 lots, the economic feasibility

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of various DEIR alternatives should be fairly apparent.

The Initial Study incorrectly concludes that the subject lots do not at all contribute to groundwater recharge. That conclusion is founded on there being a water tight barrier between the layer of soil and the fractured bedrock.

Please direct any questions and future correspondence to Paul Edelman of our staff at the above letterhead address or at 310-589-3200 ext. 128 or edelman@smmc.ca.gov.

Sincerely,

LINDA PARKS
Chairperson