

SANTA MONICA MOUNTAINS CONSERVANCY

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October 28, 2019

Los Angeles City Council
c/o Ms. Holly L. Wolcott, City Clerk
City of Los Angeles
200 North Spring Street, Room 360
Los Angeles, California 90012

Council File No. 19-1134, BPW-2019-0508, 11472 West Laurelcrest Drive

Hon. Councilmembers:

The Santa Monica Mountains Conservancy (Conservancy) supports the appeal of the above-referenced Tree Removal Permit (BPW-2019-0508) at 11472 West Laurelcrest Drive. The Conservancy is the principal State planning agency in the Santa Monica Mountains Zone. The scale and ecological damage of the subject proposed project are antithetical to the public interest.

The California Environmental Quality Act (CEQA) requires for such a proposed project with significant adverse impacts that an Initial Study and Mitigated Negative Declaration (MND) be prepared and circulated for public comment. The extensive removal of protected trees alone prevents the subject project from qualifying for a Categorical Exemption.

Conservancy staff supports the points raised by the appellant's consultants in both the letter provided by Land Protection Partners (July 14, 2019), and the memorandum from Cooper Ecological Monitoring, Inc. (July 13, 2019). The proposed removal of six established Coast Live Oak trees (*Quercus agrifolia*) is potentially significant biological impact that must be addressed in an MND. The requirement to plant replacement trees, which is a mitigation measure required under the City's Protected Tree Ordinance, should serve to demonstrate that such an action is ineligible for a Categorical Exemption from CEQA.

The subject property and the adjacent undeveloped property at 11476 Laurelcrest Drive, currently support more than a half-acre of Coast Live Oak and California Black Walnut (*Juglans californica*) woodland habitat of a density that is found nowhere else in an otherwise completely developed hillside neighborhood. The existing Oak and Walnut woodland habitat on these two properties is a valuable refuge and foraging area for deer and other wildlife that can otherwise only traverse this area on paved streets. The proposed

removal of a portion of this habitat would be a potentially significant adverse biological impact that must be addressed in an MND. No analysis of the site as a habitat refuge has been conducted.

The entirety of the subject property is located within the Santa Monica Mountains Zone (established in Section 33105, California Public Resources Code), an environmental resource of critical concern. CEQA Guidelines Section 15300.2(a), which lists Exceptions to Categorical Exemptions makes it clear that that the subject project is ineligible for a Categorical Exemption due to its location:

"(a) Location. Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located -- a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies."

Further correspondence and notice regarding this project should be sent to the attention of Paul Edelman, Deputy Director of Natural Resources and Planning, at King Gillette Ranch, 26800 Mulholland Highway, Calabasas, California 91302.

Sincerely,

IRMA R. MUÑOZ
Chairperson