

**SANTA MONICA MOUNTAINS CONSERVANCY**

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August 31, 2020

Vincent P. Bertoni, Director  
City of Los Angeles Department of City Planning  
201 N. Figueroa Street  
Los Angeles, California 90012

**City Planning Department Enforcement  
of California Department of Fish and Wildlife  
Advancement to Candidacy of Southern California  
Evolutionary Significant Unit of Mountain Lions**

Dear Mr. Bertoni:

The California Department of Fish and Wildlife (CDFW) is conducting a one year status review of a proposed evolutionarily significant unit (ESU) of mountain lions in southern and central coast California pursuant to Fish and Game Code section 2074.6. The status review is a result of the Fish and Game Commission's decision to accept for consideration the petition to list mountain lion populations within the proposed ESU under the California Endangered Species Act (CESA). Therefore, mountain lion populations in the proposed ESU are now a candidate species under CESA.

As a candidate species, mountain lions within the proposed ESU receive the same legal protection afforded to an endangered or threatened species under CESA (Fish and Game Code Section 2085). For locations where development impacts could have deleterious effects on a candidate species, CDFW moves from being a CEQA Trustee agency to a Responsible agency.

The City of Los Angeles boundaries encompass two of six identified sub-populations within the ESU. Those two sub-populations are the San Gabriel/San Bernardino Mountains and Central Coast South populations, the later of which includes the Santa Monica Mountains.

Mountain lion P-22's longstanding occupation of Griffith Park, the un-collared male lion captured annually in photographs in Laurel Canyon by Citizens for Los Angeles Wildlife (CLAW), the recent ill fated incursion of P-61 across the 405 freeway as shown by local television news in the Sepulveda Pass, frequent park employee sightings in Franklin Canyon

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Park, and numerous residential security camera shots of lions show that there is mountain lion habitat in the City of Los Angeles portion of the Santa Monica Mountains, both east and west of the 405 freeway. The ongoing multi-year National Park Service mountain lion tracking study has also shown lion presence in the City of Los Angeles portions of the Simi Hills, the Santa Susana Mountains, and Verdugo Mountains. No scientists question the presence of mountain lions in the San Gabriel Mountains.

The Santa Monica Mountains Conservancy is the principal State planning agency for both the Santa Monica Mountains Zone and the Rim of the Valley Trail Corridor Zone.

The Santa Monica Mountains Conservancy adopted an *Eastern Santa Monica Mountains Habitat Linkage Planning Map* in 2017 that was promptly provided to you and your Planning Department staff. That map was updated and re-adopted by the Conservancy in February 2020. The map both defines the boundaries and labels habitat blocks. The map also shows both known and probable habitat linkages between these habitat blocks. County-supplied GIS parcel data is also specifically shown such that initial potential biological development impacts on any size parcel can be ascertained.

The Santa Monica Mountains Conservancy adopted a *Griffith Park Area Habitat Linkage Planning Map* in December 2017 that was promptly provided to you and your Planning Department staff. The map both defines the boundaries and labels habitat blocks. The map also shows both known and probable habitat linkages between these habitat blocks. County-supplied GIS parcel data is also specifically shown such that initial potential biological development impacts on any size parcel can be ascertained.

The Conservancy applauds the work of your Department's Wildlife Pilot Study in the eastern Santa Monica Mountains. However, the combination of mountain lion's advancement to Candidate species status and the unceasing, rapid erosion of habitat blocks (patches) and connecting wildlife pathways used by this species in the City requires an immediate change in action by the City in its environmental assessment processes.

Without question, mountain lions make use of narrow habitat linkages and paved City streets in the Santa Monica Mountains. Thus by strong inference, mountain lions could make use of any of the 96 demarcated (numbered 1-96) habitat blocks shown on the above referenced *Eastern Santa Monica Mountains Habitat Linkage Planning Map*. Thus further by strong inference, mountain lions could make use of any of the scores of wildlife corridors shown on the above referenced *Eastern Santa Monica Mountains Habitat Linkage Planning*

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*Map.* These maps are iterative and will be progressively updated by the Conservancy because conditions change.

As an initial Departmental change, the Conservancy requests the Department not issue a Categorical Exemption for any parcel that includes, or abuts, a numbered habitat block or shown wildlife movement pathway on either the Conservancy's 2017 or 2020 *Eastern Santa Monica Mountains Habitat Linkage Planning Maps* or the 2017 *Griffith Park Area Habitat Linkage Planning Map*. There are numerous junctures in the habitat linkage system between the 405 freeway and Griffith Park (on both the north and south-facing slopes of the range) where the development of a single family resident could permanently sever the effective movement of large mammals, in perpetuity.

At a minimum, a detailed constraints analysis must be conducted for any development including fencing for any parcel that includes or abuts a numbered habitat block or shown wildlife movement pathway on either the Conservancy's 2017 or 2020 *Eastern Santa Monica Mountains Habitat Linkage Planning Map* or 2017 *Griffith Park Area Habitat Linkage Planning Map*. Such constraints analyses must also look at all relevant habitat connectivity issues that encompass adjoining parcels. Based on the Conservancy's maps, all such parcels must be assumed to have habitat value or habitat linkage value to mountain lions unless demonstrated otherwise. The National Park Service tracking data, security camera photos, and the fact that lions appear in habitat blocks with poor (must use paved streets and jump over fences) connectivity to larger core habitat areas such as Franklin Canyon, Fryman Canyon, and Hoag Canyon all show that narrow connections between houses, and paved City streets, facilitate the movement of mountain lions in the eastern Santa Monica Mountains.

Any project or development that could potentially harm or degrade the potential movement of mountain lions or key lion resources--such as secluded areas or natural water sources--in any City wildlands in the Santa Monica Mountains, Simi Hills, Santa Susana Mountains, Verdugo Mountains, or San Gabriel Mountains must be analyzed in a Negative Declaration, at a minimum. No project that adversely affects the viability of mountain lions in any portion of the City should be approved unless there is a permanent set of mitigation measures to adequately offset that damage. Such mitigation must be constructed and approved in a manner that no future development or future City approvals can degrade its function.

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With this new Candidate status for mountain lions and the above-referenced Conservancy habitat linkage maps, the City has all the necessary nexus to implement the above requirements immediately. There is no need for another millimeter of study or planning. The science and the California Fish and Game Commission are telling the City that the above-referenced constraints analyses and mitigation measures are the only way to comply with the CESA today.

Thank you for your consideration. Please address any correspondence to Paul Edelman, Deputy Director for Natural Resources and Planning at the above letterhead address or by email at [edelman@smmc.ca.gov](mailto:edelman@smmc.ca.gov).

Sincerely,

IRMA MUÑOZ  
Chairperson