

SANTA MONICA MOUNTAINS CONSERVANCY

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November 16, 2020

Ms. Linda Lou
Department of City Planning
City of Los Angeles
221 North Figeroa Street, Room 667
Los Angeles, California 90012

Hollywood Community Plan Update Comments

Dear Ms. Lou:

The Santa Monica Mountains Conservancy (Conservancy) offers the following comments on the Hollywood Community Plan Update. The Conservancy is the principal State planning agency for the Santa Monica Mountains Zone, which includes a significant portion of the Hollywood Community Plan Area.

Policy PR3.4 supports the rezoning of paper streets for open space easements that can be used to connect trails and access recreational areas. The policy should adopt a tenant of zero net loss or erosion of public foot access on paper streets. The policy should state that where unpermitted physical encroachments into paper streets have occurred that no new building permits be issued on said properties until the encroachment is cured or said full, or partial, blockage of wildlife movement or public access is permanently mitigated to satisfaction of the Planning Director. The policy must be further expanded with specific language to be effective. The following language should be inserted to provide for effective public and wildlife access:

No paper street, or section thereof, in the plan area shall be vacated without an initial study, public notice, a public hearing, and findings of no loss of potential public access or diminution of potential wildlife movement. Said initial study must reference the compatibility of the proposed action with all available planning documents that address wildlife habitat connectivity including the Santa Monica Mountains Conservancy's adopted *Eastern Santa Monica Mountains Habitat Linkage Planning Map* and *Griffith Park Habitat Linkage Planning Map*. If a paper street has any level of existing, or potential, value for either public trail access or wildlife movement, the whole of the street boundary (not a portion) should be rezoned for such purposes. Where applicable, no paper street shall be vacated if Public Resources Code Section 33207(b) applies to give the Conservancy first right of refusal.

As the primary State planning agency in the plan area, the update should reference the unique resource value and scope of both the Santa Monica Mountains Conservancy's adopted *Eastern Santa Monica Mountains Habitat Linkage Planning Map* and *Griffith Park Habitat Linkage Planning Map*. It should reference that these planning maps are iterative documents adjusted periodically to reflect new development and are re-adopted by the Conservancy. The last adoptions were in 2020 and 2019, respectively.

The plan update should include language that adopts all aspects of the City's Wildlife Pilot Study and the proposed accompanying Ordinance in advance. That may seem like backwards timing, but the outcome of that study must be reflected in the plan. Every aspect of the study will reflect a general public benefit and thus there is no risk in such an advance adoption or integration.

In the interim, the plan should emphasize the importance of maximum viewshed protection of all ridgelines (including any proposed development that comes within 50 vertical feet of a ridgeline apex); and definitively state that an all encompassing Ridgeline Protect Ordinance is essential to adequately protect public views. All ridgelines should be protected not just those deemed as prominent in a planning process.

The present draft plan policies that support the permanent protection of open space and habitat are not effective alone in achieving any such land protection. The plan must explicitly state that to the extent possible, via adequate legal nexus, that the City must require permanent deed restrictions on designated open space areas tied to any applicable building permits, without exception. Said permanent deed restrictions must explicitly prohibit any development including Accessory Dwelling Units and any fencing that can potentially inhibit movement of large and medium-size native mammals. Only with such permanent, explicitly restrictive deed restrictions can any permanent progress be made in maintaining adequate habitat connectivity in the Santa Monica Mountains. Without such deed restrictions imposed by the City, the probability of a future functioning habitat linkage leading to Griffith Park is dim.

The plan must include policies that recommend maximum avoidance of all tree and shrub species protected by City Ordinance. Such policies should explore ways of further penalizing the loss or damage to such species and rewarding development that demonstrably avoids such tree loss or damage. The plan should recommend that applicants consider granting voluntary conservation easements to the Mountains Recreation and Conservation Authority (MRCA) to permanently protect native tree habitat and simultaneously create secure habitat stepping stones for wildlife movement.

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The Conservancy is in full support of the proposed area expansion of Hillside Construction Regulations to create optimum regulation uniformity.

The plan must recognize all existing structures that allow wildlife to cross over the 101 freeway in the Cahuenga Pass—such as the Mulholland Drive overpass. The plan must recognize that for wildlife to both leave and enter the greater Griffith Park ecosystem that wildlife usage of these freeway crossing structures is essential. The plan must recognize that unless unbroken chains of protected parcels with both adequate width and topography provide wildlife access to both sides of these freeway crossing structures, that Griffith Park is in jeopardy of becoming isolated from both immigration and emigration of terrestrial wildlife necessary to maintain viable sub-populations of multiple species.

The plan must include a policy that states that the wildlife populations of Griffith Park are part of the Public Trust to be maintained to the maximum extent possible including assuring that City land use decisions do not diminish the viability of such populations.

The plan should state that public projects that reduce residential neighborhood tourist traffic in the Hollywood Sign vicinity and have no adverse ecological effects should be encouraged. The plan should recognize the value of the 18.5-acre private land holding at 2864 Cahuenga Boulevard to provides exactly such benefit. The site can provide parking outside of a residential neighborhood and provide unmatched views of the Hollywood Sign, Mount Lee, and Lake Hollywood.

The current draft plan maps are missing many fee simple open space properties owned by the Conservancy and the MRCA. The plan should also show all conservation easements and deed restrictions held by the MRCA for wildlife habitat purposes. Those can be easily provided to your staff in any desired electronic form.

Please direct any questions or correspondence to Paul Edelman, Deputy Director of Natural Resources and Planning, at King Gillette Ranch, 26800 Mulholland Highway, Calabasas, California 91302.

Sincerely,

IRMA R. MUÑOZ
Chairperson