

SANTA MONICA MOUNTAINS CONSERVANCY

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December 21, 2020

Jason McCrea
City of Los Angeles
Department of City Planning
221 North Figueroa Street, Suite 1350
Los Angeles, California 90012

Notice of Preparation Comments
The Retreat at Benedict Canyon Project - ENV-2018-1509-EIR

Dear Mr. McCrea:

The Santa Monica Mountains Conservancy (Conservancy) offers the following comments on the above-referenced 59-guest room hotel project on 33 acres in the Santa Monica Mountains Zone. The Draft Environmental Impact Report (DEIR) must address the Conservancy's *Eastern Santa Monica Mountains Habitat Linkage Planning Map* for which the most recent addition was adopted in early 2020. Electronic copies of this map have been supplied to your department.

The 15 parcels that make up the proposed project are located in habitat block number 79 on that iterative planning map. Habitat block 79 is a large area that encompasses the east side of Benedict Canyon and the west side of Peavine Canyon. The subject property is located in a northern extension of habitat block 79. Habitat block 79 from north to south is approximately two miles long. At this time, mapping and aerial photography review show only one marginal west wildlife entrance into habitat block 79 and one high quality east entrance. The ongoing viability of east-west wildlife movement on the south face of the range is severely threatened by the lack of western habitat connectivity with habitat block 79.

At this time, our analysis shows that the only recognizable east-west habitat connectivity across Benedict Canyon Drive on the entire south face of the Santa Monica Mountains is via a gated private street named Lancer Court that crosses the street into habitat block 79 a short distance west of the proposed project. A Conservancy mapped crossing at Westwanda Drive was recently blocked by a new apparently by-right home. A wildlife crossing can also be made north of Liebe Drive but it is unknown if there is a connection southward into habitat block 79. The northwestern corner of habitat block 79 at the Highridge Road and Oak Pass Place intersection is the only habitat linkage that leads eastward. So any wildlife moving southward towards the project must go through the

project property to reach habitat east of habitat block 79. In all scenarios habitat block 79 is vital to east-west wildlife movement.

The DEIR must further address in detail how both the proposed project and the subject property fit into the northernmost portion of habitat block 79. The DEIR must further address the importance of habitat block 79 to east-west wildlife movement in the eastern Santa Monica Mountains. All of these existing and potential wildlife corridors connecting to habitat block 79 are shown on the attached figure.

For the record the Santa Monica Mountains ecosystem east of the 405 freeway has expanded the scientific parameters of how severely impacted and fragmented natural lands can support medium and large-bodied mammals. That ability of this landscape to support these species is one hundred percent dependent on adequate habitat connectivity and adequate habitat resources. The above analysis shows how fragile this support system is today. Last year the construction of one by-right house on Benedict Canyon Drive eliminated the only known fence-free habitat linkage to connect habitat blocks on either side of the road. It is imperative to remember that this system is what provides mountain lions, mule deer, bobcats, and grey foxes to Griffith Park in the heart of the city. The viability for these species to cross Benedict Canyon Drive is on life support.

Any project that requires a zone change and multiple variances in this fragile habitat system must not substantially degrade the capacity of this habitat linkage system that is mapped in the Conservancy's *Eastern Santa Monica Mountains Habitat Linkage Planning Map*. The proposed project spreads residential structures throughout out the subject 33 acres leaving barely a cumulative acre of hillside fragments that are not in permanent brush clearance zones. The proposed project does not call out any permanent open space or any defined and fully protected wildlife corridors.

The DEIR must include a fully analyzed Wildlife Corridor alternative that clusters the nodes of development enough to provide both for permanently protected onsite habitat located outside of fuel modification zones and for adequate dedicated wildlife corridors. There is a need for a completely onsite dedicated wildlife corridor from Hutton Drive to the open space in the southeast property corner. There is also a need for a completely onsite dedicated wildlife corridor from open space in the southwest property corner to the open space in the southeast property corner.

Wildlife corridors can be of widely varying widths as long as the most narrow sections are not too (directly or indirectly) restrictive to movement and the length-to-width-ratio

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provides adequate spacial habitat in the actual corridor. A considerable amount of habitat located at the southern flank of the subject property blends with open space on adjacent other private property. Some of that open space on this other private property has perimeter fencing. The Wildlife Corridor DEIR alternative must include contiguous adequate onsite habitat width to provide a functional east-west habitat linkage between the east and west property boundary. If other private lands add to that linkage width that is a benefit, but a benefit that cannot be counted on because properties can be fenced without permits. If some other private land can be purchased and protected via a highly restrictive conservation easement to add to these linkages that too is a benefit.

The last key element of this Wildlife Corridor alternative is the requirement of conservation easements over every square-foot of dedicated wildlife corridor. Such conservation easements must be recorded before any grading, tree removal, building permits are issued.

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