

Communication from Public

Name: JAMIE T. HALL
Date Submitted: 11/03/2020 12:28 PM
Council File No: 19-1134
Comments for Public Posting: Please see the attached letter from the California Native Plant Society in support of the CEQA Appeal.

California Native Plant Society

Los Angeles/ Santa Monica Mountains Chapter
15811 Leadwell St., Van Nuys, CA 91406
November 2, 2020

Public Works & Gang Reduction Committee
c/o Ms Holly L. Wolcott, City Clerk
City of Los Angeles
Planning Commission
200 N. Spring St.
Los Angeles, CA 90012

RE: CEQA Appeal for Project Located at 11472 West Laurelcrest Drive, Council file 19-1134, BPW-2019-0508

Honorable Council Members:

On behalf of the California Native Plant Society (CNPS), Los Angeles/Santa Monica Mountains Chapter, I am writing to ask you to support the appeal of the Board of Public Work's determination that the tree removal permit for this property is categorically exempt from environmental review. We are supporting the appeal because of the environmental sensitivity of the natural resources on the site which is in the Santa Monica Mountains Zone. We agree with the appellants concerning this well-crafted and science-based appeal and urge you to support the appeal and require that a CEQA review be done before the proposed project can be considered for approval. We understand that even the Board of Public Works own chairman has objected to the project and the issuance of a tree removal permit for the property.

We note that at least six old-growth oaks on the property are targeted for destruction along with many others that will be adversely impacted should the project go forward. Destroying an old-growth native oak tree is akin to cutting down a coast redwood or a bristlecone pine. This destruction cannot be mitigated – each tree supports and sustains 300-400 animal species as well as sequestering huge amounts of carbon. Planting a boxed oak tree from a nursery does not mitigate the loss of all the fauna that were living on that destroyed tree; those creatures go into landfill. Other trees on the property (e.g., black walnuts) also have protected status. What good is a City Protected Tree Ordinance if it allows rubber stamping of native tree removal without careful review? In my experience, it is nearly impossible to recreate an oak woodland. The destruction of these oak and walnut trees cannot be undone and will have unintended, adverse ecological consequences for our City's environmental future.

The CNPS is a non-profit organization of 10,000 laypersons and professional botanists with 35 statewide chapters. Our mission is to increase the understanding and appreciation of California's native plants and to conserve them in their natural habitats through education, science, advocacy, horticulture and stewardship. For many years, we have worked tirelessly to protect the native flora of our area and oppose efforts to enable unsustainable development in the region. This project does not contribute to the environmental health of our City and would mean yet another hit on our increasingly rare urban forest. We urge you to give the native protected trees on the Laurelcrest Drive property a chance at survival.

Sincerely,


Snowy Dodson, Chapter Co-President

Email: snowdy.dodson@csun.edu Ph: 818-782-9346



Dedicated to the preservation of California native flora



Communication from Public

Name: The Hillside Federation
Date Submitted: 11/03/2020 03:28 PM
Council File No: 19-1134
Comments for Public Posting: Please see attached comment from The Hillside Federation

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Los Angeles, CA 90027
www.hillsidefederation.org

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Kagel Canyon Civic Assn.
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LFIA (Los Feliz)
Mt. Olympus Property Owners
Mt. Washington Homeowners All.
Nichols Canyon NA
N. Beverly Dr./Franklin Canyon
Oak Forest Canyon HOA
Oaks Homeowners Assn.
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Upper Mandeville Canyon Assn.
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Honorable Paul Krekorian
Los Angeles City Council
City Hall
200 N. Sprint Street, Room 435
Los Angeles, CA 90012

November 5, 2019

Re: **Appeal of BPW-2019-0508 (Council File 19-1134)**
11472 West Laurelcrest Drive

Honorable Councilmember Krekorian:

The Federation of Hillside and Canyon Associations (“Federation”) founded in 1952 represents 42 resident and homeowner associations spanning the Santa Monica Mountains. The mission of the Federation is to promote those policies and programs which will best preserve the natural topography and wildlife of the mountains and hillsides for the benefit of all the people of Los Angeles. At its meeting of October 15, 2019, the Federation voted to support the above-captioned appeal of the Board of Public Work’s determination that the tree removal permit is categorically exempt from environmental review.

In determining to support the appeal Federation members reviewed the tree permit application file, including objection letters submitted by the appellant and the Santa Monica Mountains Conservancy (“SMMC”), as well as substantial evidence regarding potentially significant environmental impacts from experts Land Protection Partners and Cooper Ecological Monitoring, Inc. Based on our review of the record, the Federation agrees entirely with SMMC Deputy Director Paul Edelman that a categorical exemption for the proposed project is inadequate and compliance with the California Environmental Quality Act minimally requires no less than a Mitigated Negative Declaration. The Federation notes that in voting against the project, Board of Public Works Chair Kevin James came to the same conclusion.

The Federation urges you to support the appeal and require adequate environmental review before the proposed project can be considered for approval.

Sincerely,

Charley Mims
President
The Hillside Federation

Communication from Public

Name: Jamie T. Hall
Date Submitted: 11/03/2020 08:19 PM
Council File No: 19-1134
Comments for Public Posting: Please see the attached letter in support of the CEQA Appeal for the above referenced project.

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November 3, 2020

VIA ELECTRONIC MAIL

Public Works and Gang Reduction Committee
City of Los Angeles
200 North Spring Street
Los Angeles, California 90012

**Re: CEQA Appeal for 11472 West Laurelcrest Drive, Los Angeles, California; CF
19-1134**

Dear Chair Blumenfield and Committee Members:

This firm represents Sunshine Hill Residence Association ("Appellant" or "Association"). This letter is intended as a rebuttal to the recommendation report filed by the Urban Forestry Division ("UFD" or "City") pertaining to the above-referenced appeal.

I. The Project is Not Eligible for Class 32 Exemption

The City asserts two primary arguments in the recommendation report. First, the City asserts that the Project is subject to the Class 32 Urban Infill Exemption. This exemption is intended for "environmentally benign projects." However, the City cannot the following required finding: "the project site has no value as habitat for rare, endangered, or threatened species." Initially, it should be noted that the City must find that the project has no value - not that the project has a less than potentially significant environmental impact. The Project must have *no value at all*. Further, the City must determine that the project has no value as habitat for rare, threatened, or endangered species. The project site need not necessarily have rare, threatened or endangered species located on the property. Rather, the question is whether the project site has value as habitat.

a. The Southern California Black Walnut is a Rare Species

The City errs in the Recommendation Report by assuming that the presence of a dead Southern California Black Walnut on the property necessarily means that the project site cannot possibly have value. As evidenced in the attached expert report authored by a trained academic and environmental professional, the presence of the dead black walnut demonstrates just the opposite – that the project site does have value for rare, threatened, or endangered species. Further, The Southern California Black Walnut qualifies as a rare species. Again, the fact that the species previously existed on the property is evidence that the project site has value as habitat for that species. As explained by Dr. Travis Loncore in the attached expert report, a tree can die for a variety of reasons, and that does not mean that the project site has no value as habitat for rare, threatened, or endangered species. Also, there are Southern California black walnuts that are located on the adjacent properties which demonstrates that the soil and other environmental conditions provide habitat for the black walnut.

The Southern California Black Walnut meets the criteria to be considered a “rare” species. CEQA Guidelines 15380(d) states as follows: "A species not included in any listing identified in subdivision (c) shall nevertheless be considered to be endangered, rare or threatened, if the species can be shown to meet the criteria in subdivision (b)." The criteria in CEQA Guidelines 15380(b) are as follows:

(b) A species of animal or plant is “rare” when either:

(A) Although not presently threatened with extinction, the species is existing in such small numbers throughout all or a significant portion of its range that it may become endangered if its environment worsens; or

(B) The species is likely to become endangered within the foreseeable future throughout all or a significant portion of its range and may be considered “threatened” as that term is used in the Federal Endangered Species Act.

The Southern California Black Walnut is assigned a California Rare Plant Rank (CRPR) of 4.2 by the California Native Plant Society. The California Department of Fish and Wildlife (CDFW), a trustee agency, has concluded that the Southern California Black Walnut meets the definition of a “rare, threatened or endangered species.” CDFW has published a documented entitled “*Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Nature Communities.*”¹ CDFW states at page three of that document that plants tracked by the California Natural Diversity Database and California Native Plant Society as California Rare Plant Rank 3 or 4 meet the definition of rare or endangered under CEQA Guidelines 15380, subdivisions (b) and (d) and warrant consideration under CEQA on the basis of declining trends, recent taxonomic information and other factors.

Moreover, there is an abundance of academic research that supports the conclusion that the Southern California Black Walnut is “rare.” Many articles have been authored regarding the species’ special status. One article is the United States Department of Agriculture’s Index of

¹ This document is available at <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline>.

Species Information² (“Index”). The Index notes that the species does not have a federal status, but states under “Other Status” the following: “Southern California walnut woodland is severely threatened by urbanization. The Nature Conservancy, in cooperation with the state of California, is giving high priority to acquiring vegetative/habitat data on the woodland. They list it as one of California’s rare and imperiled natural communities.” The Index contains 38 reference articles, many of which are scientific and scholarly articles regarding the status of the Southern California Black Walnut.³

The following excerpts are from three of these articles:

“Due to urban sprawl much of the California black walnut woodland has been destroyed or is threatened, and it is considered to be one of California’s rare and imperiled natural communities. (Jones & Stokes Associates 1987).”

Keeley, Jon E. 1990. Demographic structure of California black walnut (*Juglans californica*: Juglandaceae) woodlands in southern California. *Madrono*. 37(4): 237–248. (available via Dropbox link provided)

“California walnut woodlands have been seriously diminished by developments in southern California. Many scientists consider it an endangered community. However, the species itself does not have endangered classification and accordant protection.”

Mullahy, D.P. 1992. Distribution and environmental relations of California black walnut (*Juglans californica*) in the eastern Santa Susana Mountains, Los Angeles County. *Crossosoma* 8:1–18. (available via Dropbox link provided)

“There are 2 problems to be addressed concerning management of California walnut woodlands; 1. The outright disappearance of the community in the face of rapid urbanization, and 2. reversal of ecological changes within the community due to overgrazing, increased fire frequency, and introduced species of understory plants. The first problem is the most important and urgent; if it is not dealt with, the second problem is moot. . . . It is important to recognize that California walnuts are rapidly approaching the status of a custodial species, which I define as a species with remnant natural populations found only within reserves of limited size, where protection of the population is an explicit management goal. Free ranging herds of American bison (*Bison bison*) in natural parks are an example of a custodial species. ”

Quinn, Ronald D. 1990. The status of walnut forests and woodlands (*Juglans californica*) in southern California. In: Schoenherr, Allan A., ed. *Endangered plant communities of southern California* (available via Dropbox link provided)

Further, the California Department of Fish and Wildlife (“CDFG”) has published a

² The Index can be accessed at <https://www.fs.fed.us/database/feis/plants/tree/jugcal/all.html>.

³ The Association has uploaded several of these articles to dropbox for the City to download at <https://www.dropbox.com/sh/7ebzz2fuyg5qqqw/AAAE0xMC8PG4dlu1ohaiEmh1a?dl=0>

“Special Plants List” and has included the Southern California Black Walnut on that list.⁴

The walnut is listed on page 76 of the Special Plants List with a global ranking of G3 and state ranking of S3, along with having a California Rare Plant Rank (CRPR) of 4.2. G3 means globally Vulnerable—At moderate risk of extinction due to a restricted range, relatively few populations (often 80 or fewer), recent and widespread declines, or other factors. S3 follows the same definition of Vulnerable but for California alone. Id. CRPR 4 means Limited Distribution / Watchlist, and the .2 (of 4.2) means moderately threatened, with 20–80% of its occurrences threatened.

Even the California Department of Transportation (Caltrans) has acknowledged that the Southern California Black Walnut should be considered under CEQA. In a Supplemental EIR conducted in 2016 for a highway project in Southern California, Caltrans stated the following:

Southern California black walnut (California walnut or California Black walnut) is not federally and/or State-listed and has no official status. However, California black walnut merits consideration under CEQA because of the relatively limited distribution of California walnut woodland, and it is a CNPS CRPR 4 species (plants of limited distribution). California walnut is only found in Southern California. Recent construction has removed this habitat in many areas, and its future is uncertain.”

Caltrans SR-241/SR-91 Tolled Express Lanes Connector Project Draft Supplemental Environmental Impact Report (October 2016); Excerpt from Chapter 3. (available via Dropbox link provided)

Moreover, the City of Los Angeles conducted an Environmental Impact Report (“EIR”) in 2017 for a proposed project at Harvard Westlake. The issue of whether or not the Southern California Black Walnut should be considered under CEQA as a “rare” species was a major issue. The City conceded the issue that the species was “rare” and stated the following:

“WALNUT WOODLAND HABITAT VALUE

Southern California Black Walnut Woodlands are a relatively rare habitat type that has a range limited to the coastal slope of the California coast and transverse ranges from central Santa Barbara County in the north to Central San Diego County in the south (Sawyer, J. 1995; Barbour, m. 1977; Anderson, E. 2002). Though this range encompasses most of coastal southern California, the distribution of the southern California black walnut is limited largely to north facing slopes and some deep canyons where conditions are relatively moist compared to more exposed slopes and flats.”

City of Los Angeles Final Environmental Impact Report for Harvard-Westlake School Parking, Safety, and Athletic Plan (June 2017); Appendix D.4 Update to Biological Resources Report. (available via Dropbox link provided)

⁴ See California Department of Fish and Wildlife California Natural Diversity Database (CNDDDB) available at <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=109383&inline>.

Further Southern California Black Walnut trees are included in the City CEQA Thresholds Guide's⁵ "Sensitive Species Compendium."

Exhibit C-7, continued
SENSITIVE SPECIES COMPENDIUM - CITY OF LOS ANGELES

SCIENTIFIC NAME	COMMON NAME	STATUS	ZONE *	HABITAT
Plants (Con't)				
<i>Deinandra minthornii</i> (<i>Hemizonia parryi australis</i>)	southern tarplant	1B	Unknown	ET, GL, VP
<i>Dichondra occidentalis</i>	western dichondra	4	4	CH,OW,CS, GL
<i>Dithyrea maritima</i>	beach spectaclpod	ST, 1B	4	CD,CS
<i>Dodecahema leptoceras</i>	slender-horned spineflower	SE, FE,1B	1	AF,CH
<i>Dudleya b. blochmaniae</i>			3	CS,CB,CH, GL
<i>Dudleya cymosa marcescens</i>		1B	3	CH
<i>Dudleya cymosa ovatifolia</i>			3,4	CH,CS
<i>Dudleya multicaulis</i>			2	CH,CS,GL
<i>Dudleya virens</i>			4	CH,CS
<i>Erysimum insulare suffrutescens</i>	suffrutescent wallflower	4	unknown	CB,CD,CS
<i>Fremontodendron mexicanum</i>	Mexican funnelbush	SR, FE, 1B	1,2,3	MF,CH,OW
<i>Galium angustifolium gabrielense</i>	San Antonio Canyon bedstraw	4	1	MF
<i>Galium cliffordsmithii</i>	Santa Barbara bedstraw	4	2,4	OW
<i>Galium johnstonii</i>	Johnston's bedstraw	4	unknown	MF
<i>Goodmania luteola</i>	golden goodmania	4	Unknown	DW,PL,GL
<i>Helianthus nuttallii parishii</i>	Los Angeles sunflower	1A	3	CM,FM
<i>Heuchera abramsii</i>	Abram's alumroot	4	Unknown	MF
<i>Heuchera elegans</i>	urn-flowered alumroot		Unknown	MF
<i>Hulsea vestita gabrielensis</i>	San Gabriel Mtns. sunflower	4	1	MF
<i>Juglans c. v. californica</i>	So. Cal. black walnut	4	1,2,3	CH,OW,AF
<i>Juncus acutus leopoldii</i>	southwestern spiny rush	4	4	CD,CM
<i>Juncus duranii</i>	Duran's rush	4	Unknown	MF
<i>Lasthenia glabrata coulteri</i>	Coulter's goldfields	1B	Unknown	CM,PL,VP
<i>Lepechinia fragrans</i>	fragrant pitcher sage	4	3	CH
<i>Lilium humboldtii ocellatum</i>	ocellated Humboldt lily	4	1,2,3	CH,OW,CO
<i>Linanthus orcuttii</i>	Orcutt's linanthus	1B	Unknown	CH,MF
<i>Lupinus elatus</i>	silky lupine	4	Unknown	MF
<i>Lupinus excubitus v. johnstonii</i>	interior bush lupine	4	Unknown	MF
<i>Lupinus peirsonii</i>	Peirson's lupine	1B	Unknown	CH,CS,RW
<i>Malacothamnus davidsonii</i>	Davidson's bush mallow	1B	1,3	CS,RW
<i>Microseris douglasii v. platycarpa</i>	small-flowered microseris	4	Unknown	OW,CS,GL
<i>Monardella cinerea</i>	gray monardella	4	Unknown	MF

The Southern California Black Walnut is a sensitive species with a Class 4 status

Refer to Exhibit C-1

⁵ The Threshold Guide may be accessed at <http://www.environmentla.org/programs/Thresholds/Complete%20Threshold%20Guide%202006.pdf>

The status of this tree is listed as “4” – which means “Plants of limited distribution - a watch list.” A footnote describing this species category is included that states “Very few of the plants constituting List 4 meet the definitions of Section 1901, Chapter 10 (Native Plant Protection Act) or Sections 2062 and 2067 (California Endangered Species Act) of the California Department of Fish and Game Code, and few, if any, are eligible for listing. Nevertheless, many of them are significant locally, and the [Department of Fish and Game] recommends that List 4 plants be evaluated for consideration during preparation of environmental documents relating to CEQA. This may be particularly appropriate for the type locality of a List 4 plant, for populations at the periphery of a species’ range or in areas where the taxon is especially uncommon or has sustained heavy losses, or for populations exhibiting unusual morphology or occurring on unusual substrates.” A marked-up screenshot of the Sensitive Species Compendium Key Chart from the Thresholds Guide is shown below:

Exhibit C-7, continued
SENSITIVE SPECIES COMPENDIUM - CITY OF LOS ANGELES

KEY (continued)

California Native Plant Society (CNPS)	
1A	Plants presumed extinct in California ³
1B	Plants that are rare, threatened, or endangered in California or elsewhere ³
2	Plants that are rare, threatened, or endangered in California, but more common elsewhere ³
3	Plants about which more information is needed - a review list ⁴
4	Plants of limited distribution - a watch list ⁵
Habitat Code Designations - California Natural Diversity Database (CNDD)	
AF	Alluvial Fan Sage Scrub
BW	Brackish Water
CB	Coastal Bluff Scrub
CD	Coastal Dunes
CH	Chaparral
CL	Coastal Lagoon

The Southern California Black Walnut is a “plant of limited distribution” that “should be evaluated under CEQA.”

³ All of the plants constituting Lists 1A, 1B, and 2 meet the definitions of Section 1901, Chapter 10 (Native Plant Protection Act) or Sections 2062 and 2067 (California Endangered Species Act) of the California Department of Fish and Game Code, and are eligible for listing. According to the DFG, if the taxa on List 1A are rediscovered, they should be fully considered during preparation of environmental documents relating to CEQA. List 1B and 2 plants should be fully considered during preparation of environmental documents relating to CEQA.

⁴ Some of the plants constituting List 3 meet the definitions of Section 1901, Chapter 10 (Native Plant Protection Act) or Sections 2062 and 2067 (California Endangered Species Act) of the California Department of Fish and Game Code, and are eligible for listing. The DFG recommends that List 3 plants be evaluated for consideration during preparation of environmental documents relating to CEQA.

⁵ Very few of the plants constituting List 4 meet the definitions of Section 1901, Chapter 10 (Native Plant Protection Act) or Sections 2062 and 2067 (California Endangered Species Act) of the California Department of Fish and Game Code, and few, if any, are eligible for listing. Nevertheless, many of them are significant locally, and the DFG recommends that List 4 plants be evaluated for consideration during preparation of environmental documents relating to CEQA. This may be particularly appropriate for the type locality of a List 4 plant, for populations at the periphery of a species’ range or in areas where the taxon is especially uncommon or has sustained heavy losses, or for populations exhibiting unusual morphology or occurring on unusual substrates.

Based on the threat to this native tree, in 2006 the City adopted Ordinance 177404 to amend its Protected Tree Ordinance. The Southern California Black Walnut was added to the list of protected trees and their removal was prohibited without the issuance of a tree removal permit and a determination from the Board of Public Works that removal was “necessary” in order to allow for “reasonable development.”

Notably, the City Planning Commission made the following finding when it recommended approval to the City Council for the amended Protected Tree Ordinance⁶:

“In accordance with Charter Section 556, the proposed ordinance (Appendix A) is in substantial conformance with the purposes, intent, and provisions of the General Plan. It implements Policy 3 of Section 6: Endangered Species of the Conservation Element⁷ of the General Plan by *revising regulations concerning endangered species*; and Policy 4 of Section 10⁸: Habitats of the Conservation Element of the General Plan by creating legislation that encourages and facilitates protection of local native plant and animal habitats. It also implements the California Environmental Quality Act by designating *Juglans californica var. californica* as a protected species, consistent with the recommendations of the California Native Plant Society (6th. Inventory of Endangered Species, RED Code 4-4-4) that this “locally significant” species be “evaluated for consideration during the preparation of environmental documents relating to CEQA.”

The City Council adopted the Planning Commission’s findings. Policy 3 of Section 6: Endangered Species of the Conservation Element of the General Plan states:

“Policy 3: continue to support legislation that encourages and facilitates protection of endangered, threatened, sensitive and rare species and their habitats and habitat corridors.”

⁶ The case file for the amended Protected Tree Ordinance can be found at <http://clkrep.lacity.org/onlinedocs/2003/03-1459.PDF>.

⁷ The Conservation Element clearly lays out the rationale for regulation and protection: “Without protection of habitats suitable for species propagation, entire species of native plants and animals gradually will decline or become extinct. A couple of hundred plants and animals that live in Los Angeles habitats are listed on the federal and/or state endangered, threatened or species of special concern lists. Within the Santa Monica Mountains National Recreation Area alone 26 plants and animals are classified as rare, threatened or endangered and 58 more have been placed on the list of species of special concern by the National Park Service. Within the city more than 180 plant and animal species are listed by the Environmental Affairs Department for the city as a whole.”

⁸ It appears that the original source document incorrectly states the section number where the “Habitats” portion of the Conservation Element is found. The “Habitats” section is located in Section 12 (not Section 10).

Policy 4 of the Habitats portion of the Conservation Element of the General Plan states:

“Policy 4: continue to support legislation that encourages and facilitates protection of local native plant and animal habitats.

There should be no question that the project site has “value” as “habitat” for this endangered, threatened or rare species. Further, the City’s own CEQA Threshold Guide confirms this proposed project is located in an area of the City that was mapped and shaded as open space in the City’s CEQA Threshold Guide. The Guide states that for areas that are located within a shaded open space area (as identified on Exhibits C-2 through C-5) certain questions must be asked, two of which would be answerable in the affirmative in this case. The Guide states that in such a case, “further study in an expanded Initial Study, Negative Declaration, Mitigated Negative Declaration or EIR may be required.”

Again, for purposes of determining whether the Project meets the requirements of the Class 32 exemption, a public agency is not tasked with deciding whether or not the impacts of the removals are significant – the question is whether or not the project site has “value as habitat.” Clearly it does as evidenced by the presence of this species on the property.

The City may claim that because the developer intends to plant replacement trees on the property that this eliminates any environmental impacts associated with the Project. Again, this is *irrelevant* to the determination of whether or not the “project site has value as habitat for rare, threatened or endangered species.” The proposed project’s building footprint and new street will forever remove habitat – the planting of saplings does not change that. Put another way, the replacement of individual trees does not negate the loss of habitat. Again, the City admitted loss of habitat was a potential environmental issue when it prepared the EIR for the proposed Harvard Westlake project in 2017. The City stated the following:

“OAK AND WALNUT WOODLAND IMPACT SIGNIFICANCE AFTER MITIGATION

While the impacts to oak and walnut trees are to be mitigated in accordance with the Tree Ordinance, and thus by definition mitigated to a less than significant level by the City’s standards, the replacement of individual trees does not immediately mitigate the loss of habitat. Oak and walnut woodlands are considered sensitive regionally and even at the statewide level. The loss of these habitats is already considered significant regionally and statewide. As discussed below, the loss of oak-walnut woodland onsite is considered to be a cumulatively considerable contribution to a significant impact with respect to loss of this resource.” (available via Dropbox link provided)

Further, the Association highlights the CEQA Guidelines statement that the Class 32 exemption is designed for “environmentally benign” in-fill projects. CEQA Guidelines Section 15332. This is not the type of “environmentally benign” project envisioned by the California Legislature.

b. The Project Site Contains a Coast Live Oak-California Walnut Woodland

The City's conclusion that the project site does not consist of a Coast Live Oak -- California Walnut Woodland is not supported by substantial evidence as outlined in the attached expert report. Among other things, the City fails to acknowledge that the unit of analysis for mapping of a sensitive natural community is not the parcel but the vegetation patch and the vegetation patch necessarily includes the adjacent parcels which include southern California black walnuts. It is undisputed that a Coast Live Oak -- California Walnut Woodland is a sensitive natural community that requires CEQA review.

In sum, the City cannot conclude that the project qualifies for the Class 32 Environmental Exemption because the project site has value for rare, threatened, or endangered species.

II. The Project Does Not Qualify for the Class 3 Exemption

The second basis for the City's exemption is the fact that the project consists of the development of a single-family home which qualifies for the Class 3 exemption under CEQA. However, as noted in the Association's appeal, both the Project's location and unusual circumstances prevent the City from utilizing the Class 3 Environmental Exemption. The City asserts in the recommendation report that the parcel is not located in a "particularly sensitive environment" and disputes that the Santa Monica Mountain Zone ("Zone") is an environmental resource of critical concern. However, the City fails to appreciate that the Legislature found *as a matter of law* that the Zone is an environmental resource of critical concern. The Legislature itself declared that the Santa Monica Mountains Zone is a unique and valuable environmental resource that provided essential relief from the urban environment. The City may not like the fact that the Legislature made this finding, but no deference is owed to the City to reach an alternative legal conclusion.

As noted in *Berkeley Hills Watershed Coalition*⁹, a "resource" is a "natural source of wealth or revenue," or a "natural feature or phenomenon that enhances the quality of human life." *Id.* The Legislature's explicit findings regarding the characteristics of the Zone in the Santa Monica Mountains Conservancy Act ("Act") more than meets this definitional requirement. The Santa Monica Mountains Conservancy ("SMMC" or "Conservancy"), a state agency, supports the Association's contention that the Zone is an environmental resource of critical concern. The Conservancy also contends that the Zone is precisely mapped. The City claim that the Zone is loosely defined is meritless. The Act maps the Zone with great detail. Pub. Resources Code Section 31105 The Conservancy is owed great deference with regard to these questions. As if that wasn't enough, the City has produced their own maps in the CEQA Thresholds Guide¹⁰ outlining Biological Resource Areas in the City. The project is within a mapped Biological Resource Area. The Project is clearly within an area determined to be an "environmental resource of critical concern" that has been "precisely mapped."

⁹ The court cited Merriam-Webster's Collegiate Dict. (11th ed. 2014) p. 1061.

¹⁰ See <https://planning.lacity.org/eir/CrossroadsHwd/deir/files/references/A07.pdf>.

Again, it is a *matter of law* that the Santa Monica Mountain Zone is an environmental resource of critical concern. Under applicable case law, appellant must present a “fair argument” supported by substantial evidence that the project “may impact on” the environmental resource. Appellant need not demonstrate a potentially significant impact. Rather, Appellant must only present a “fair argument” supported by substantial evidence that the project “may impact on” the environmental resource. If a lead agency is presented with a fair argument supported by substantial evidence, the lead agency shall prepare an Environmental Impact Report (“EIR”) even though it may also be presented with other substantial evidence that the project will not have a significant effect. *No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.3d 68. The fair argument standard of review is a low threshold, and the City cannot refute a fair argument presented by an appellant by presenting their own fair argument. The reduction in size of a sensitive natural community and of habitat for a rare species is evidence that the project may impact on the environmental resource of critical concern. As explained in the attached expert report, replacement trees alone do not mitigate the impacts of habitat loss.

Additionally, there are unusual circumstances associated with the project. A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.

As pointed out by the California Supreme Court in the *Berkeley Hillside Preservation* case,

A party invoking the exception may establish an unusual circumstance without evidence of an environmental effect, by showing that the project has some feature that distinguishes it from others in the exempt class, such as its size or location. In such a case, to render the exception applicable, the party need only show a reasonable possibility of a significant effect due to that unusual circumstance.

Berkeley Hillside Pres., *supra*, 60 Cal.4th at p. 1105. The California Supreme Court, in *Berkeley Hillside Preservation*, continued its analysis:

Alternatively, under our reading of the guideline, a party may establish an unusual circumstance with evidence that the project will have a significant environmental effect. That evidence, if convincing, necessarily also establishes “a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.”

Berkeley Hillside Pres., *supra*, 60 Cal.4th at p. 1105. Thus, if it can be shown, as is the case here, that the Project *will* have a significant effect on the environment, that alone is sufficient to eliminate the applicability of the categorical exemption. The attached expert letter demonstrates that the project will have a significant effect on the environment. The City has proposed no mitigation whatsoever to account for habitat loss.

III. Conclusion

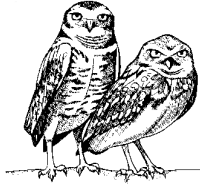
For the reasons outlined above, the City should grant the appeal and undertake environmental review for the Project. I may be contacted at 310-982-1760 or at jamie.hall@channellawgroup.com if you have any questions, comments or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Jamie T. Hall". The signature is fluid and cursive, with the first name "Jamie" being more prominent than the last name "Hall".

Jamie T. Hall

Exhibit A



Land Protection Partners

P.O. Box 24020, Los Angeles, CA 90024-0020
Telephone: (310) 247-9719

November 3, 2020

Public Works and Gang Reduction Committee
City of Los Angeles
200 North Spring Street
Los Angeles, CA 90012

Re: BPW-2019-0508, Tree Removal - 11472 Laurelcrest Drive

Dear Chair Blumenfield and Committee Members:

This letter provides facts and expert opinion based on facts regarding the City's proposed denial of the CEQA appeal for the proposed development project at 11472 Laurelcrest Drive. The applicant has sought a tree removal permit to facilitate the development of the project and the City has erroneously concluded that the project is exempt from CEQA.

My background and relevant credentials are as follows. I have taught Environmental Impact Analysis, World Vegetation, Forest Ecosystems, and a course on California Oaks and Oak Woodlands at UCLA, where I am currently an Associate Adjunct Professor. I am also professionally credentialed as a Certified Senior Ecologist by the Ecological Society of America and have received state and foundation grants to produce vegetation maps for the Baldwin Hills and, as part of a multi-institutional team, Catalina Island. I have been a member of the Los Angeles County Environmental Review Board for 23 years. I have attached a 2-page academic biosketch your reference.

I have personally seen the subject parcel from offsite locations where I had permission to be present. I visited the site on November 29, 2019 and noted the vegetation on the property and across the contiguous unbuilt land at that location.

My field observations confirmed the assessment that I had made in a previous letter, which had been based on a review of the documents about the project site. I concluded then, and field observations later confirmed, that the vegetation association present across the project site and adjacent parcels consists of Coast Live Oak-California Walnut Woodland vegetation association. I observed that California Walnut was the subdominant species with Coast Live Oak in the overstory. There were many walnut trees that had been cut down across the patch (I could not discern the property boundaries) that were resprouting, which indicated that California Walnut had previously been close to codominant with Coast Live Oak. The understory was open,

consistent with the definition of this vegetation association (Keeler-Wolf and Evens 2006).¹ I also observed the presence of Toyon, which is another species typically found within this vegetation association.

When mapping vegetation, especially with codominant species, the vegetation classification continues into those areas of a patch where one or the other of the species is not present. Classification of vegetation on any small parcel depends on the species composition of the overall contiguous vegetation patch, because the patch is the appropriate unit of analysis, not the parcel.²

Extensive presence of California Walnuts in the patch (as distinct from the subject parcel) is not disputed. On the parcel itself, the City's arborist observed two walnut trees, and the applicant's biologist reported one dead walnut. It is unclear if anyone properly surveyed the property lines, but this is irrelevant because the status of the vegetation community does not depend on the parcel alone, but rather the vegetation patch. The available, empirical facts confirm that the vegetation classification for the parcel is the Coast Live Oak-California Walnut Woodland association.

Presence of a dead plant, in this instance California Walnut, indicates that the site is suitable for the growth of that plant. Trees die based on drought, age, and other factors, but the presence of a dead tree is proof positive that slope, aspect, soil, and climate conditions are present on the site for growth of the species. Plus, the abundance of walnut trees on adjacent parcels that I observed is further proof that the location is high quality habitat for California Walnut.

The materials put forth claiming that no rare species are found on the project site contain errors of fact and therefore cannot be relied upon as substantial evidence. Claims in the City's recommendation report are inaccurate, conclusory, and not based on facts. I review these claims next.

Claim: "[T]he Project site is too degraded to constitute a sensitive biological community, due to the routine clearing of the vegetation in the understory, and has no value as habitat for endangered, rare, or threatened species" (p. 12).

This statement is categorically false.

First, clearing of vegetation in the understory does not turn a Coast Live Oak-California Walnut Woodland into another vegetation type. The definition of the association itself allows for an understory that is grassy, which could be entirely nonnative species (Keeler-Wolf and Evens 2006). Even with understory clearing, the vegetation patch would still be considered a Sensitive Natural Community by the California Department of Fish and Wildlife (CDFW; the relevant Trustee Agency, which was not consulted in this proceeding). Much of the biodiversity value in

1. Downloadable at <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18243&inline>.

2. See California Department of Fish and Wildlife protocols at <https://wildlife.ca.gov/data/vegcamp/publications-and-protocols>.

this vegetation type is in the trees themselves and the soils, so routine clearing has limited impact.

Second, the site is obviously habitat for a rare species, California Walnut. It is a common misperception that *habitat* means vegetation that supports animal life; that is, that *habitat* is synonymous with vegetation and when speaking of habitat, it implies habitat for an animal species. But this definition misses that plant species also have habitats, which are made up of the environmental conditions defined by soils, slope, aspect, water availability, shade, and other factors. The City appears to have assumed that vegetation can only *be* habitat and ignored that the plants themselves may be rare and that the site may provide habitat for them. Once this mischaracterization is remedied, the value of the site as habitat for rare California Walnuts is indisputable.

Again, the site is still habitat even if an existing specimen is dead, because its presence is evidence that it provides the conditions necessary for the growth of the species. If one found a dead mountain lion in Griffith Park, one would not argue that Griffith Park was not habitat for mountain lions. The walnut does not have to be living for the site to be habitat; the presence of a dead individual shows without question that the site is habitat for that rare species.

The applicant's biologist makes the mistake of stating that California Walnut is not present on the project site (Biological Assessment Services, p. 15). This is an error; the biologist noted earlier in the report that a dead tree was present. For other species he noted probable presence (e.g., Oak Titmouse [a bird species] as being "likely" to occur on site), but erroneously noted "No" under presence for California Walnut. This easily falsifiable claim cannot be relied upon as substantial evidence because it is not factual.

Claim: "The project site, however, is not a sensitive biological community under CEQA because it is in an urbanized area surrounded by residential uses and is too degraded to constitute a sensitive biological community" (p. 15).

This statement is incorrect. The constituent elements for the sensitive vegetation community are not rendered nonexistent by the presence of residential units. The vegetation patch is affected by the surrounding land uses, but as noted by Mr. Cooper in his report, the site is large enough to support indicator species of healthy native woodland such as Oak Titmouse (see CalPIF 2002).³

Claim: "Thus, in addition to the lack of the understory component, the Project site does not constitute an "oak-walnut woodland" because there are no living walnut trees" (p. 16).

This statement is false because the unit of analysis for mapping a sensitive natural community is not the parcel, but the vegetation patch.⁴ To properly classify the vegetation on the project site, the adjacent, contiguous woodland must be observed, and the vegetation unit classified as a whole. When this is done, the proper vegetation association to which the woodland at the project site is assigned is Coast Live Oak-California Walnut Woodland. This classification is

3. Downloadable at <http://www.prbo.org/calpif/pdfs/oak.v-2.0.pdf>.

4. See California Department of Fish and Wildlife protocols at <https://wildlife.ca.gov/data/vegcamp/publications-and-protocols>.

independent from the presence of a (dead) California Walnut on the project site. Furthermore, presence of the dead tree is evidence that the site is, and continues to be, habitat for this rare species.

Claim: “Thus, the “understory” onsite and on surrounding parcels is largely non-native and has been and will continue to be routinely cleared of the native plants Land Protection Partners’ claim establish a sensitive biological community on site” (p. 16).

This claim shows a lack of familiarity with vegetation mapping and the biological value of woodlands. A non-native understory does not preclude Coast Live Oak-California Walnut Woodland from being a Sensitive Natural Community. In fact, a grassy understory is written in the description of this association. The important part of the woodland is an area with the diagnostic trees (Coast Live Oak and California Walnut). Their recognition as a Sensitive Natural Community by CDFW explicitly for the purpose of CEQA analysis requires no more than their co-occurrence at the scale of the mapping unit.

In addition, the City seems to be arguing that future disturbance will degrade the habitat at the site. Under CEQA future disturbance must be considered as part of the project and cannot be construed as changing the baseline of the pre-project site condition. Therefore, this claim is meritless and irrelevant except if the City were to conduct the environmental review that is necessary under CEQA.

Claim: “Similarly, the report claims that birds could be harmed by striking project windows (RA 11, p. 24). Again, Land Protection Partners identify no protected species that will, or even may be harmed by the Project, and fail to acknowledge that the site is substantially surrounded by existing residences and windows.”

Killing of birds violates federal law even if the birds are not sensitive species. Although the Trump Administration has misinterpreted the Migratory Bird Treaty Act to exclude incidental killing of birds resulting from otherwise legal activities, that interpretation has been thrown out by the courts and the risk of killing birds and violating the MBTA is a CEQA issue. Furthermore, species at the project site include birds that are identified by the U.S. Fish and Wildlife Service as “Birds of Conservation Concern” (U.S. Fish and Wildlife Service 2008).⁵ This list includes species that are likely to become candidates for listing under the Endangered Species Act if conservation actions are not taken. Oak Titmouse, an oak woodland indicator species, and Allen’s Hummingbird are both on the federal list of Birds of Conservation Concern and are present at the project site. Nuttall’s Woodpecker is also on the list and has a high likelihood of being present based on the location, habitat, and its occurrence at other nearby locations. In addition, Oak Titmouse is on the Watch List for the Sensitive Bird Species of Los Angeles County (Allen et al. 2009),⁶ as is California Towhee, another species at the project site.

5. Downloadable at <https://www.fws.gov/migratorybirds/pdf/management/BCC2008.pdf>.

6. Downloadable at <http://planning.lacounty.gov/site/sea/wp-content/uploads/2018/08/LA-Countys-Sensitive-Bird-Species.pdf>.

The City's claims, therefore, lack factual basis and therefore cannot be considered to be substantial evidence. They are opinions, unsupported by facts, and those opinions are not coming from a recognized professional in ecology.

Consideration of the facts in the record leads to the conclusion that the project presents an unusual circumstance because it will have significant adverse impacts on the environment.

First, Coast Live Oak-California Walnut Woodland is a Sensitive Natural Community, as defined by the California Department of Fish and Wildlife. CDFW requires consideration of impacts to Sensitive Natural Communities in environmental review: "Natural Communities with ranks of S1-S3 are considered Sensitive Natural Communities to be addressed in the environmental review processes of CEQA and its equivalents."⁷ Coast Live Oak-California Walnut Woodland is not currently assigned a rarity rank, but is identified as a Sensitive Natural Community, meaning that CDFW considers it to be at least S3 rarity.⁸ Loss of area of a Sensitive Natural Community is considered to be significant under CEQA unless mitigated by protection or restoration of the community at a 5:1 mitigation ratio, according to CDFW officials.⁹ The project would result in the loss of area of a Sensitive Natural Community. The project does not include any habitat mitigation (i.e., protection or restoration of additional habitat area).

Planting additional trees on the parcel in an area that is already a Sensitive Natural Community does not constitute mitigation. The City's Protected Tree Ordinance is not sufficient to offset impacts to Sensitive Natural Communities. The Protected Tree Ordinance defines impacts and mitigations in terms of individual trees. CEQA, as informed by the guidelines from the California Department of Fish and Wildlife, requires that Sensitive Natural Communities be measured and mitigated in terms of geographic area (see materials starting with the Natural Communities page on the CDFW website; <https://www.wildlife.ca.gov/Data/VegCAMP/Natural-Communities>).

Replacing individual trees but not habitat area is ineffective. Scientists have firmly established the predictable relationship between habitat area and the number of species supported by that area (Arrhenius 1921, Preston 1948). The relationship, referred to as the "species-area curve," is expressed by the equation $S = cA^z$ where S is number of species, A is area, and c and z are constants that vary by the ecosystem type and the geographic configuration of the area. If A decreases, then S also decreases. Because the proposed project would reduce the habitat area on the site considerably (at least by 30%), it will have a resulting impact on the number of species

7. <https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities#sensitive%20natural%20communities>

8. *Id.* Elaborating on the methods for describing rarity, CDFW writes, "We have not provided the G and S rank for all associations in the October 2018 version of this classification. However, associations currently designated as being of S3 or rarer are indicated with a Y in the Sensitive column."

9. Kelly Schmoker-Stanphill, California Department of Fish and Wildlife, email to Travis Longcore dated November 27, 2019. Quoting from that email as an example of DFW guidance on projects with Sensitive Natural Communities present: "The Department considers natural communities with ranks of S1-S3 to be sensitive natural communities that should be addressed in CEQA (CEQA Guidelines § 15125[c]). An S3 ranking indicates there are 21-80 occurrences of this community in existence in California, S2 has 6-20 occurrences and S1 has less than 6 occurrences. The Department recommends avoiding any sensitive natural communities found on the Project. If avoidance is not feasible, the Department recommends mitigating at a ratio of no less than 5:1 for impacts to S3 ranked communities and 7:1 for S2 communities. This ratio is for the acreage and the individual plants that comprise each unique community."

supported by the site. People often imagine that wildlife at a development site will simply move to a new area after development, but this is not what happens; any suitable habitat surrounding a site will already be occupied and the wildlife numbers are reduced each time habitat is lost through development.

It is improper and unallowable under the established set of rules and guidelines to rely on mitigation that is defined in terms of individual trees under the Native Tree Protection Ordinance. Rather, Sensitive Natural Communities must be mapped properly, and the area of impacts be mitigated by replacement of habitat at an appropriate mitigation ratio in consultation with CDFW.

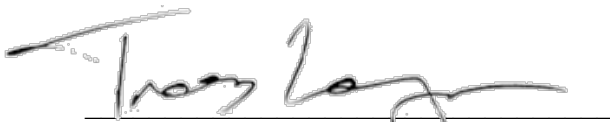
Therefore, as currently proposed, the project will have a significant adverse impact on biological resources through the loss of a Sensitive Natural Community.

Second, the project site is California Walnut habitat. California Walnut is recognized by the State of California as a rare species. Loss of habitat of a rare species is considered a significant adverse impact. This conclusion is standard practice in environmental impact assessment and the Los Angeles CEQA Thresholds Guide (p. C-6) considers loss of habitat of a rare species to be a significant impact.¹⁰ The project would reduce the area of California Walnut habitat. Therefore, the project will have a significant adverse impact on biological resources through the loss of habitat of a rare species.

Through either of these impact routes, the project will have a significant adverse impact on the environment if approved as designed.

Finally, the Project will adversely impact an environmental resource of critical concern (the Santa Monica Mountains Zone) and therefore is not eligible for an exemption from CEQA review.

I attest that the foregoing analysis is true and represents facts and my professional opinion based on facts.



Travis Longcore, Ph.D., CSE, GISP

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10. See <https://planning.lacity.org/eir/CrossroadsHwd/deir/files/references/A07.pdf>

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A. PROFESSIONAL PREPARATION

<u>University</u>	<u>Location</u>	<u>Major</u>	<u>Degree & Year</u>
University of Southern California	Los Angeles, California	Sust. Cities	Post-doc., 1999–2001
University of California, Los Angeles	Los Angeles, California	Geography	Ph.D., 1999
University of California, Los Angeles	Los Angeles, California	Geography	M.A., 1995
University of Delaware	Newark, Delaware	Geography	Honors B.A., 1993

B. PROFESSIONAL BACKGROUND

Academic Appointments

Associate Adjunct Professor, UCLA Institute of the Environment and Sustainability, 2010–present
Assistant Professor of Architecture, Spatial Sciences, and Biological Sciences, University of Southern California, 2015–2019

Associate Professor (Research) of Spatial Sciences, University of Southern California, 2010–2015

Associate Professor (Research) of Geography, University of Southern California, 2008–2010

Lecturer, UCLA Institute of the Environment, 2003–2010

Adjunct Assistant Professor (Research), USC Department of Geography, 2001–2008

Lecturer, UCLA Department of Ecology and Evolutionary Biology, 2001–2006

Lecturer, UCLA Department of Geography, 2000–2007

Editorial Boards

Associate Editor, *Urban Ecosystems*, 2018–present

Academic Editor, *PLoS ONE*, 2014–present

Editorial Board, *Avian Conservation and Ecology*, 2012–2015

Certifications

Certified GIS Professional (GISP®), License 91255, 2015–2025

Certified Senior Ecologist (CSE), Ecological Society of America, 2010–2021

C. RELEVANT PUBLICATIONS

Longcore, T., C. Rich, and S. Weiss. Essay: Nearly all California Monarch overwintering groves require non-native trees. *California Fish and Game* 106(3):220–225 (2020).

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D. BROADER IMPACTS

- Developed science-based habitat restoration program and native plant nursery for coastal dune habitats and transferred operation to nonprofit training at-risk youth and young adults.
- Directed growth of yearlong senior practicum problems course for B.S. in environmental science, with competitive application by off-campus clients ranging from Fortune 500 companies to local nonprofits.
- Established a captive breeding program for endangered butterflies as collaboration with a nonprofit and a community college that provides opportunity for students from underrepresented groups to gain experience rearing several endangered species.
- Conceived of and commissioned development of freeware software program to implement complex mathematical analysis of transect counts of butterflies to estimate population size that is now used by land managers and agency scientists.
- Co-developed and maintain website gathering and sharing data about the threatened Western Snowy Plover and its management on the Central Coast of California (www.westernsnowyplover.org).
- Includes standardized survey to obtain information from multiple beach managers across jurisdictions to facilitate evaluation of management options.