

Communication from Public

Name: Save Coldwater Canyon, Inc.

Date Submitted: 11/23/2020 10:40 AM

Council File No: 19-1134

Comments for Public Posting: City of Los Angeles 200 North Spring Street Los Angeles, California 90012 keyonna.kidd@lacity.org RE: CEQA Appeal for 11472 West Laurelcrest Drive, Los Angeles, California: Council File 19-1134 Dear Council President Martinez and Councilmembers: Save Coldwater Canyon (SCC) is a California nonprofit public benefit corporation, fighting to preserve and protect the scenic beauty, natural environment, health, safety and welfare of Coldwater Canyon and it's neighboring communities. SCC has reviewed both the comments by esteemed environmental organizations, the reports by biological scientists, and we are deeply concerned. SCC respectfully urges the City Council to grant the CEQA Appeal filed by Sunshine Hill Residents Association and we ask Councilmember Krekorian to recognize and act upon his duty to protect valuable and irreplaceable resources in his own Council District. The Santa Monica Mountains are a protected and precious resource and biologists have weighed in on the effects of removing open space and protected trees from CEQA review. Once this review is aborted, where will it end? We believe the city must recognize the few woodlands left, and the Santa Monica Mountains as a significant natural resource. To do less flies in the face of science and degrades an eco-system that benefits the community for the profit of individual developers. SCC joins the Santa Monica Mountains Conservancy, Sierra Club, Federation of Hillside and Canyons Association and California Native Plant Society in agreeing with the applicant's science based appeal. We urge that environmental analysis as required under CEQA be completed before the project be considered for approval. A minimum of 6 old growth protected oaks trees are targeted for destruction. This destruction cannot be mitigated as biologists have certified that each tree sustains hundreds of animal species as well as sequestering large amounts of carbon. They have stated it is impossible to recreate a coast live oak woodland and that destruction of these protected old oaks and walnut trees cannot be undone and will have an adverse ecological consequence for our cities environmental future. SCC urges the City of Los Angeles to follow the science and insist that native urban woodlands have adequate review as required by CEQA; that an MND, at minimum, be prepared and circulated for public review.

Communication from Public

Name: Santa Monica Mountains Conservancy - Paul Edelman
Date Submitted: 11/23/2020 04:47 PM
Council File No: 19-1134
Comments for Public Posting: Please provide this letter from the Santa Monica Mountains Conservancy to the Councilmembers for this item. Thank You

SANTA MONICA MOUNTAINS CONSERVANCY

KING GILLETTE RANCH
26800 MULHOLLAND HIGHWAY
CALABASAS, CALIFORNIA 91302
PHONE (818) 878-0866
FAX (818) 878-0508
WWW.SMMC.CA.GOV



November 23, 2020

Via Electronic Mail

Members of the City Council
City of Los Angeles
200 North Spring Street
Los Angeles, California 90012
Keyonna.Kidd@lacity.org

**CEQA Appeal for 11472 West Laurelcrest Drive
Council File No. 19-1134**

Hon. City Councilmembers:

The Santa Monica Mountains Conservancy (Conservancy) revises and supplements comments made in its November 4, 2020, July 12, 2019, August 2, 2019 and October 28, 2019 letters based on updated information. The Conservancy has reviewed the supplemental documentation on behalf of Appellant dated November 23, 2020 and fully agrees with the conclusions reached in that letter.

The Conservancy has been made aware of the extensive testimony provided to the City regarding the presence of wildlife in the area and on the project site (11472 West Laurelcrest Drive). Notably, reliable resident testimony based on personal knowledge has been submitted demonstrating that many mule deer frequent the project site as well as bobcats and even a Mountain Lion that was observed across the street. Based on this information, the Conservancy believes that the project site “has value as habitat for rare, threatened or endangered species” and is therefore ineligible for a Class 32 exemption under CEQA. As the City is certainly aware, the local population of Mountain Lion is a candidate species under formal consideration for listing as threatened or endangered under the California Endangered Species Act (CESA) pursuant to California Fish and Game Code Section 2074.2. The mountain lion became a candidate species on April 16, 2020. Candidate species are protected under the CESA pursuant to Section 2085 during the remainder of the CESA listing process. The project site’s value as habitat for this candidate species also constitutes an unusual circumstance that prevents the City from deeming the Project exempt as a Class 3 project. The loss of habitat that will necessarily result from the construction of this single-family home requires the City to perform environmental analysis and mitigate the impacts.

In May 2017, the Conservancy first adopted the Eastern Santa Monica Mountains Habitat Linkage Planning Map (“Map”). The Map is intended to guide and inform decisionmakers regarding habitat connectivity and potential animal movement impacts. The Staff Report prepared for the Map dated January 23, 2017 as well as the Resolution from the Conservancy adopting, and then subsequently amending, the Map is attached as **Exhibit A**. As noted in the Resolution, the “eastern Santa Monica Mountains habitat linkage between the San Diego (405) freeway and Griffith Park is of regional scientific significance” and the “efficacy of the subject habitat linkage system could be severed by new fencing on just one or two residential parcels.” The project site at 11472 Laurelcrest is not shown on the Map, but there are many peripheral habitat blocks that were not mapped in 2017 or when the map was updated in February 2020 because obvious habitat linkages were not apparent from aerial photography. As noted on the Map itself, habitat block boundaries are approximate and there are many small, more isolated blocks that have not been mapped because of cost constraints. These smaller, isolated blocks nonetheless provide great value and critical habitat to urban wildlife and native plants. Their value is demonstrated by the ubiquitous recent number of nighttime security camera photographs circulated by residents of mountain lions in the eastern Santa Monica Mountains jumping fences, walking by pools, and milling around backyards. These photographs prove that lions can reach almost every unmapped habitat block in the eastern Santa Monica Mountains.

Based on the information that I have been provided for this project, including, but not limited to, resident testimony and the expert reports from Dr. Travis Longcore and Daniel Cooper, that the project site and the adjacent lot at 11478 West Laurelcrest Drive both qualify as, and shall be added as, a numbered Habitat Block on the next iteration of the Map when it is updated by the Conservancy. Further, I concur that there is a pathway to and from the two areas of open space as shown on the map in the record prepared by biologist Daniel Cooper. Again, while there is no wildlife corridor shown on the Map to and from the project site, the alignments on the Map are not intended to be 100 percent inclusive. It is my opinion based on the information that I have been presented that there is a wildlife movement pathway or corridor to and from the project site as shown on the map in the record prepared by biologist Daniel Cooper. The Map will be updated in its next iteration to reflect this fact. I have a Master’s Degree in biology and am qualified to make such a determination. Such qualifications include being the Conservancy’s chief staff ecologist for thirty years which includes studying and protecting habitat linkages in the eastern Santa Monica Mountains for an even longer period of time than thirty years.

City Council
11472 West Laurel Crest Drive – CF 19-1134
November 23, 2020
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The Conservancy respectfully urges you to grant the CEQA Appeal filed by Sunshine Hill Residents Association. The proposed project does not qualify for a Categorical Exemption from the California Environmental Quality Act (CEQA). No approvals or clearances for the subject projects should be considered until a Mitigated Negative Declaration, with site-specific mitigation measures, has been issued and publicly circulated.

Please feel free to contact me with any questions at 310-589-3200, ext. 128, or by e-mail at edelman@smmc.ca.gov. Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "Paul Edelman", written over a light blue rectangular background.

PAUL EDELMAN
Deputy Director
Natural Resources and Planning

Exhibit A

Memorandum

To : The Conservancy
The Advisory Committee

Date: January 23, 2017

From :  Joseph T. Edmiston, FAICP, Hon. ASLA, Executive Director

Subject: **Agenda Item 13: Consideration of resolution adopting Eastern Santa Monica Mountains Habitat Linkage Planning Map, City of Los Angeles.**

Staff Recommendation: That the Conservancy adopt the attached resolution adopting an Eastern Santa Monica Mountains Habitat Linkage Planning Map (Version January 2017).

Legislative Authority: Public Resources Code Section 33211(c)

Background: The importance of the habitat linkage or wildlife corridor system that provides for animal movement between the 405 and 101 freeways leading to Griffith Park has long been recognized. The Conservancy and other agencies have acquired land and commented on development projects to protect distinct sections of the habitat linkage system for over 30 years. Tens of millions of public dollars have been invested in this effort. That effort to date has been successful enough to bring mountain lions into the area and to progressively increase the sightings of bobcats until the last few drought years. Many unprotected gaps remain. However, the bulk of the current protection effort is solely reactive to development threats because record high land values make it impossible to complete many fee simple acquisitions of parcels. Better planning tools are needed if the wildlife corridor system is to remain intact and be less subject to hit or miss protection objectives. Conservation easements, deed restrictions, and no fencing conditions are the only other means to permanently protect pieces of the habitat linkage system.

The City of Los Angeles Planning Department does not conduct independent research on habitat connectivity and relies on public agency and citizen comments for input on potential wildlife corridor impacts. The Department staff has long requested a comprehensive map of known and potential wildlife corridors in the eastern Santa Monica Mountains. The subject Eastern Santa Monica Mountains Habitat Linkage Planning Map proposed for adoption by the Conservancy provides that tool to the City Planning Department, developers, and homeowners.

The subject map covers the area between the 405 and 101 freeways comprehensively, with the exception of smaller peripheral habitat patches. Those patches can be mapped and integrated into the next adopted version of the Eastern Santa Monica Mountains Habitat Linkage Planning Map. The map delineations are not definitive in all areas. The mapping consists of

outlined habitat blocks and lines depicting both known, and potentially functional, wildlife corridors between them. Many habitat block boundaries and connections located on difficult to reach private lands were not ground-truthed. The map delineations are based on the best available Google Earth aerial and street view photography combined with accumulated staff knowledge. The map is meant to be instructive to clue all parties into potential constraints and opportunities both to protect habitat connections and land within all sized habitat blocks. On the ground conditions are fluid because fences can come and go and new construction occurs in almost every neighborhood. Available no-cost aerial photography is always a portion of a year behind conditions. However, most projects that potentially affect either habitat linkages or habitat blocks can now be well known to all concerned parties and most importantly the Planning Department staff. Each distinct habitat block polygon will be sequentially numbered to establish baseline nomenclature for easy reference to all parties. More precise resolution and mapped lines can be available if LARIAC aerial photography data is purchased by the City of Los Angeles.

The attached Resolution calls for the map to be updated and re-adopted no less than annually. It is impossible to provide a perfect map and hence this mapping effort is meant to be an iterative process that includes input from all available sources.

The PDF map file attached to this staff report item is based on and shown on Google Earth photography dated October 2016. The best available Google Earth street view data was October 2015. The line data will in many places be skewed when applied to earlier photography. To really use the line data for fine analysis, users will need to import a KMZ file to use within the Google Earth program and the most recent aerial photography. Large maps can also be plotted from the PDF. The line data is in a GIS shape file format used by all public agencies.

The key factor is that now there is a baseline map adopted by the most pertinent State planning agency available to guide impact analysis by the City and to give landowners (existing and prospective) a heads up about sensitive wildlife corridor areas and the location of habitat blocks and patches that are all integral to a functional habitat linkage system.

Staff intends for the next version of the map to include all private property between the 101 freeway and Griffith Park and between the 405 freeway and Topanga State Park. All of that area is still within the City of Los Angeles boundary.

January 23, 2017; Agenda Item No. 13

Resolution No. 17-01

RESOLUTION OF THE SANTA MONICA MOUNTAINS CONSERVANCY ADOPTING
EASTERN SANTA MONICA MOUNTAINS HABITAT LINKAGE PLANNING MAP,
CITY OF LOS ANGELES

WHEREAS, the eastern Santa Monica Mountains habitat linkage between the San Diego (405) freeway and Griffith Park is of regional scientific significance; and

WHEREAS, the subject habitat linkage system and the Mulholland Drive Scenic Corridor are a cultural treasure for the City of Los Angeles; and

WHEREAS, the efficacy of the subject habitat linkage system could be severed by new fencing on just one or two residential parcels; and

WHEREAS, the subject habitat linkage system has never been comprehensively mapped and such mapping is essential to adequately assess the impacts of proposed development projects; and

WHEREAS, a Habitat Linkage Planning Map for the Eastern Santa Monica Mountains adopted by the Santa Monica Mountains Conservancy as the principal State planning agency for the area is beneficial to the City of Los Angeles Department of Planning's efforts to maintain habitat connectivity; and

WHEREAS, the Los Angeles City Council (Koretz) adopted a motion to designate the subject area as a Regional Wildlife Habitat Linkage Zone in the Municipal Code and for the Planning Department to work in consultation with the Santa Monica Mountains Conservancy, the Mulholland Design Review Board, and Citizens for Los Angeles Wildlife (CLAW) to prepare an ordinance to create a Wildlife Corridor in the eastern area of the Santa Monica Mountains; and

WHEREAS, the proposed Eastern Santa Monica Mountains Habitat Linkage Planning Map represents an initial comprehensive step to delineate the majority of habitat blocks and connecting wildlife corridors between the 405 and 101 freeways for planning, conservation, and environmental impact analysis purposes; and

WHEREAS, the aerial photography and conditions that provide background for the habitat linkage mapping represent a slice in time and limited ground truthing, hence the subject map is an iterative work that is designed to be shaped, corrected, and modified at least annually to provide the most accurate and up to date information possible; and

WHEREAS, the staff report dated January 23, 2017 further describes the project; and

WHEREAS, The proposed action is exempt from the provisions of the California Environmental Quality Act (CEQA); Now

Therefore Be It Resolved, That the Santa Monica Mountains Conservancy hereby:

1. FINDS that the proposed action is categorically exempt from the provisions of the California Environmental Quality Act (CEQA).
2. ADOPTS the staff report and recommendation dated January 23, 2017.
3. FINDS that the proposed action is consistent with the *Santa Monica Mountains Comprehensive Plan*.
4. ADOPTS the proposed Eastern Santa Monica Mountains Habitat Linkage Planning Map (Version January 2017).
5. FURTHER AUTHORIZES the Executive Director, or his assignee, to perform any and all acts necessary to carry out this resolution.

~ *End of Resolution* ~

I HEREBY CERTIFY that the foregoing resolution was adopted at a meeting of the Santa Monica Mountains Conservancy, duly noticed and held according to law, on the 23rd day of January, 2017 at Los Angeles, California.

Dated: 1/23/17


Executive Director

February 24, 2020; Agenda Item No. 11

Resolution No. 20-06

RESOLUTION OF THE SANTA MONICA MOUNTAINS CONSERVANCY AUTHORIZING ADOPTION
OF 2020 UPDATES TO 2017 SANTA MONICA MOUNTAINS CONSERVANCY EASTERN SANTA
MONICA MOUNTAINS HABITAT LINKAGE PLANNING MAP

WHEREAS, the eastern Santa Monica Mountains habitat linkage between the San Diego (405) freeway and Griffith Park is of regional scientific significance; and

WHEREAS, the subject habitat linkage system and the Mulholland Drive Scenic Corridor are a cultural treasure for the City of Los Angeles; and

WHEREAS, the efficacy of the subject habitat linkage system could be severed by new fencing on just one or two residential parcels; and

WHEREAS, the subject habitat linkage system has never been comprehensively mapped and such mapping is essential to adequately assess the impacts of proposed development projects; and

WHEREAS, a continually updated Habitat Linkage Planning Map for the Eastern Santa Monica Mountains adopted by the Santa Monica Mountains Conservancy as the principal State planning agency for the area is beneficial to the City of Los Angeles Department of Planning's efforts to maintain habitat connectivity; and

WHEREAS, the Los Angeles City Council (Koretz) adopted a motion to designate the subject area as a Regional Wildlife Habitat Linkage Zone in the Municipal Code and for the Planning Department to work in consultation with the Santa Monica Mountains Conservancy, the Mulholland Design Review Board, and Citizens for Los Angeles Wildlife (CLAW) to prepare an ordinance to create a Wildlife Corridor in the eastern area of the Santa Monica Mountains; and

WHEREAS, the adopted 2017 Eastern Santa Monica Mountains Habitat Linkage Planning Map comprehensively delineates the majority of habitat blocks and connecting wildlife corridors between the 405 and 101 freeways for planning, conservation, and environmental impact analysis purposes; and

WHEREAS, the staff report dated February 24, 2020 further describes the project; and

WHEREAS, The proposed action is exempt from the provisions of the California Environmental Quality Act (CEQA); Now

Therefore Be It Resolved, That the Santa Monica Mountains Conservancy hereby:

1. FINDS that the proposed action is categorically exempt from the provisions of the California Environmental Quality Act (CEQA).
2. ADOPTS the staff report and recommendation dated February 24, 2020.
3. FINDS that the proposed action is consistent with the *Santa Monica Mountains Comprehensive Plan*.
4. ADOPTS the 2020 updated edition of the Conservancy's Eastern Santa Monica Mountains Habitat Linkage Planning Map.
5. FURTHER AUTHORIZES the Executive Director, or his assignee, to perform any and all acts necessary to carry out this resolution.

~ *End of Resolution* ~

I HEREBY CERTIFY that the foregoing resolution was adopted at a meeting of the Santa Monica Mountains Conservancy, duly noticed and held according to law, on the 24th of February, 2020 at Thousand Oaks, California.

Dated: 2/24/20


Executive Director

Communication from Public

Name: theresa brady, conservation chair san fernando valley group of the sierra club angeles chapter

Date Submitted: 11/24/2020 09:44 AM

Council File No: 19-1134

Comments for Public Posting: Honorable councilmembers: I speak today on behalf of the Sierra Club. The Sierra Club is dedicated to the preservation and enjoyment of wildlife and nature. I want to ask you to accept the appeal of the project at 11472 Laurelcrest drive in studio city, council file number 19 -1134. There are numerous reasons that this project should have CEQA review. Biologist Dan Cooper whose report is in your possession in the packet dated October 15 2020 in your council file, states that the wildlife corridor should be preserved and that a plan to protect oak nesting birds should be a condition. The main problems with this project are that the slope is 2:1 and the trees are what hold the hillside back from erosion. If the trees are removed, this will cause two problems. One is they will no longer hold the hillside back from sliding. The other is climate change. These mature trees: 18 on the property, 8 to be removed, contain 55, 000 pounds of CO2 apiece. Furthermore, the soil that is undisturbed is a carbon sink. The damage to this undisturbed soil and the trees will cause more than 400,000 pounds of carbon to be released when calculating only the loss of the 8 trees. The full cost to climate stabilization will actually be far greater. Also the wildlife corridor protection law that Paul Koretz wrote in 2016, is violated by this project. The mere absence of a fence is not enough. The 18 retaining wall that the geologist required to restabilize the hill when the trees are removed will be an obstacle to wildlife movement. The city staff say this is not a wildlife linkage. If you look at the area on google maps you can see that it is a key part of the tree canopy and linkage to nearby canyons which are wildlife rich. Dan cooper's 6 page report states that many species of birds were observed during his survey. Many of these are dependent on Oaks. I urge you to send this project back to planning and require a full EIR. If this project goes forward, there will very likely be litigation against this decision. A delay of your decision today would be very much appreciated. Sincerely Theresa Brady Conservation Chair, San Fernando Valley Group Sierra Club Angeles Chapter

Communication from Public

Name: Jeanne

Date Submitted: 11/24/2020 11:30 AM

Council File No: 19-1134

Comments for Public Posting: This land should not be exempt from CEQA Requirements. This land has significant value and I stand with the Santa Monica Conservancy's position that CEQA approval should be required.

Communication from Public

Name: Gale West

Date Submitted: 11/24/2020 11:50 AM

Council File No: 19-1134

Comments for Public Posting: Please stop taking away our beautiful parks. There are plenty of empty apartments, if only they would lower the prices, then people could afford them. Many of these developers are not even local and they are just trying to make a quick buck off of ruining our beautiful lands.

Communication from Public

Name: Jamie Hall

Date Submitted: 11/24/2020 03:54 PM

Council File No: 19-1134

Comments for Public Posting: November 24, 2020 City of Los Angeles - City Clerk 200 N. Spring Street 3rd Floor, Room 395 Los Angeles, CA 90012 Keyonna.Kidd@lacity.org Re: Notice of Intent to Commence CEQA Action and Proceeding; Tree Removal Permit Issued for 11472 West Laurelcrest Drive; Council File # 19-1134 Dear City of Los Angeles: PLEASE TAKE NOTICE, under California Public Resources Code section 21167.5, that Petitioner, Sunshine Hill Residents Association (“Petitioner”), intends to immediately file a Petition for Writ of Mandate (“Petition”) under the provisions of the California Environmental Quality Act (“CEQA”) against the City of Los Angeles (“City” or “Respondent”). The Petition will be filed in Los Angeles County Superior Court and will allege, inter alia, that the City incorrectly determined that the proposed single-family dwelling and associated tree removal permit located at 11472 West Laurelcrest Drive (“Project”) was exempt from CEQA. Among other things, the Petition will request that the court direct the City to vacate and rescind the project approvals, the determination that the project is exempt CEQA and to otherwise comply with CEQA. Also, the Petition will seek Petitioners’ cost and attorneys’ fees. Sincerely, Jamie Hall Attorney for Petitioner

Channel Law Group, LLP

8383 Wilshire Blvd.
Suite 750
Beverly Hills, CA 90211

Writer's Direct Line: (310) 982-1760
jamie.hall@channellawgroup.com

JULIAN K. QUATTLEBAUM, III
JAMIE T. HALL *
CHARLES J. McLURKIN

*ALSO Admitted in Texas

November 24, 2020

VIA U.S. MAIL

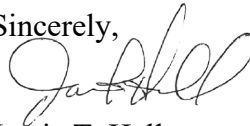
City of Los Angeles - City Clerk
200 N. Spring Street
3rd Floor, Room 395
Los Angeles, CA 90012
Keyonna.Kidd@lacity.org

Re: Notice of Intent to Commence CEQA Action and Proceeding; Tree Removal Permit Issued for 11472 West Laurelcrest Drive; Council File # 19-1134

Dear City of Los Angeles:

PLEASE TAKE NOTICE, under California Public Resources Code section 21167.5, that Petitioner, Sunshine Hill Residents Association (“Petitioner”), intends to immediately file a Petition for Writ of Mandate (“Petition”) under the provisions of the California Environmental Quality Act (“CEQA”) against the City of Los Angeles (City” or “Respondent”). The Petition will be filed in Los Angeles County Superior Court and will allege, inter alia, that the City incorrectly determined that the proposed single-family dwelling and associated tree removal permit located at 11472 West Laurelcrest Drive (“Project”) was exempt from CEQA. Among other things, the Petition will request that the court direct the City to vacate and rescind the project approvals, the determination that the project is exempt CEQA and to otherwise comply with CEQA. Also, the Petition will seek Petitioners’ cost and attorneys’ fees.

Sincerely,



Jamie T. Hall
Attorney for Petitioner