

LUNA & GLUSHON

A Professional Corporation

DENNIS R. LUNA
(1946-2016)

16255 VENTURA BOULEVARD, SUITE 950
ENCINO, CALIFORNIA 91436
TEL: (818) 907-8755
FAX: (818) 907-8760

May 9, 2022

VIA EMAIL

Los Angeles City Council
Public Works Committee
200 North Spring Street
Los Angeles, CA 90012

Re: Council File No. 22-0499
Appeal of Categorical Exemption for 2669 Bronholly Drive

Honorable Councilmembers:

Our law firm represents Bronholly & Carolus Residents Coalition (the "Residents' Coalition"), a group of property owners and residents in the immediate neighborhood of the single-family dwelling proposed at 2669 Bronholly Drive ("Project").

On March 11, 2022, the City's Urban Forestry Division ("Urban Forestry") approved a Tree Removal Permit to remove a City of Los Angeles ("City") protected toyon shrub within the footprint of the proposed Project. In connection therewith, Urban Forestry adopted two Categorical Exemptions from the California Environmental Quality Act ("CEQA"). As further set forth herein, the adoption of the Categorical Exemptions at this uniquely protected location is not only invalid for failing to comply with CEQA, but also is inherently inconsistent with this City Council's recently adopted resolutions and policies to protect wildlife linkages and refuges in the Santa Monica Mountains Zone, consult with the Santa Monica Mountains Conservancy ("SMMC"), and explicitly recognize the Griffith Park Area Habitat Linkage Planning Map as a delineation of habitat protection zones [Exhibits 1, 2].

For all of the reasons set forth herein, we urge the City to follow its own policies and direction to protect the wildlife linkage provided at the Project

location and require the Applicant to comply with the State imposed environmental mandates of CEQA. The Residents' Coalition respectfully requests that the City Council grant their appeal and require environmental review in connection with the Project.

I. Unique Biological Setting of the Project Location

This Project is located in and is a part of a single, designated habitat block (block 39L) by the Griffith Park Area Habitat Linkage Planning Map, adopted in December 2017, and the Eastern Santa Monica Mountains Natural Resource Protection Plan, adopted in December 2021, by the SMMC. [Exhibits 3, 4,¹ 5]. Block 39L is one of the 24 SMMC-mapped habitat blocks comprising the greater Griffith Park habitat area (Griffith Park is a designated Significant Ecological Area ("SEA")), is fully contiguous with and, thus, a part of the core habitat of Griffith Park, and supports the full range of species in the Griffith Park area, including mammals such as bobcat, mule deer, coyote, gray fox, and mountain lion, as well as raptors including red-tailed, red-shouldered and Cooper's hawks, Great-Horned and Western Screech owls, and a multitude of other species. As provided by the SMMC, peninsulas of high-quality connected habitat in the eastern Santa Monica Mountains, such as the southern extension of habitat block 39L, serve a vital role in providing refuges in an already challenged habitat system that supports sub-populations of numerous medium and large-bodied mammal species. [Exhibit 6].

Again, in November of last year, the Griffith Park Area Habitat Linkage Planning Map was explicitly recognized by this City Council's Planning and Land Use Management Committee (the "PLUM Committee") as a spatial habitat protection map prepared by SMMC to ensure the protection and conservation of sensitive habitat areas, such as the one that exists at the Project location. [Exhibit 1].

But the Project location is not "**just**" a part of block 39L. The proposed Project site, along with the two lots to its south, make up a critical narrow habitat "funnel" within block 39L that serves as a protected habitat linkage between the Griffith Park core habitat area and approximately ten acres of contiguous natural land located south of the subject lot. [Exhibits 6, 7]. As such, the Project site is integrated into and is a key part of the core Griffith Park habitat area. Indeed, as specifically noted by the SMMC, the Project is proposed in the narrowest of all

¹ Exhibit 4 is the particular map which delineates block 39L, which is a part of the Protection Plan attached as Exhibit 3.

choke points of the southern extension of block 39L, serving as a lone gateway/linkage without any human-constructed barriers and providing a broad swath of contiguous navigable terrain and overall natural vegetation cover.

The Project location is also part of an uncommon **north-facing** slope habitat within block 39L that includes several Mountains Recreation and Conservation Authority (MRCA)²-owned parcels, including one that is directly adjacent to the Project site. The MRCA has stated that this north-facing slope area is significant because it supports many native trees and other resources limited to more mesic chaparral habitat. [Exhibit 6].

Block 39L constitutes an environmental resource of critical concern identified by the SMMC, a State Agency under the Natural Resources Agency, as well the City's own PLUM Committee.

II. The Categorical Exemption Does Not Qualify for a Class 3 or Class 32 Categorical Exemption

a. Class 3 Categorical Exemption

Class 3 Categorical Exemptions ("CE's") are qualified by consideration of where the project is to be located. A project that would ordinarily be insignificant in its impact on the environment may, in a particularly sensitive or hazardous area, be significant. Therefore, a Class 3 CE cannot be applied where the project may impact an environmental resource of hazardous or critical concern that has been designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies. (CEQA Guidelines §15300.2(a)).

As discussed in more detail above, this Project is located in and is a part of an uncommon north-facing slope habitat within block 39L, a precisely mapped habitat block from the Griffith Park Area Habitat Linkage Planning Map, as adopted by the SMMC and explicitly recognized by the PLUM Committee as a

² The Mountains Recreation and Conservation Authority (MRCA) is a local government public entity established in 1985 pursuant to the Joint Powers Act. The MRCA is a partnership between the Santa Monica Mountains Conservancy, which is a state agency established by the Legislature, and the Conejo Recreation and Park District and the Rancho Simi Recreation and Park District both of which are local park agencies established by the vote of the people in those communities. The MRCA manages more than 75,000 acres of parkland that it owns or that is owned by the Santa Monica Mountains Conservancy.

spatial habitat protection map which ensures the protection and conservation of sensitive habitat areas, such as the one that exists at the Project location. Indeed, the proposed Project site, along with the two lots to its south, make up a critical narrow habitat “funnel” within block 39L which serves as a protected habitat linkage between the Griffith Park core habitat area and approximately ten acres of contiguous natural land located south of the subject lot, and currently exists without any human-constructed barriers, providing a broad swath of contiguous navigable terrain and overall natural vegetation cover.

The Project, as presently designed, will physically cut off wildlife access in this critical habitat funnel area, breaking the habitat linkage between the vast open space and Griffith Park SEA to the north and the ten acres of natural habitat to the south, severing a critical linkage within the Griffith Park core habitat area. [Exhibits 6, 7, 8].

Accordingly, a Class 3 CE is inappropriate.

b. Class 32 Categorical Exemption

In order to qualify for a Class 32 Exemption, the Project must meet five criteria: (a) be consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations; (b) occur within city limits on a project site of no more than five acres substantially surrounded by urban uses; (c) have no value, as habitat for endangered, rare or threatened species; (d) not result in any significant effects relating to traffic, noise, air quality, or water quality; (e) be adequately served by all required utilities and public services.

The Councilmembers should note that there is absolutely nothing in the City’s record to indicate that this Project meets these criteria. There are no findings, at all, included with the Categorical Exemption, as filed with the County of Los Angeles, or in the records provided by Urban Forestry.

Furthermore, the Project is not consistent with applicable zoning designation and regulations. It is inconsistent with LAMC 12.21.C.10 because it does not maintain a 20-foot continuous paved roadway from the driveway apron that provides access to the main residence to the boundary of the Hillside Area. Although the Applicant proposes to widen the roadway, the record is filled with evidence that makes such widening impractical, if not impossible. This road widening would cause grave impacts – which have yet to be properly addressed

– to a Coast Live Oak Tree at the front of MRCA-owned parkland directly adjacent to the Project.

Finally, as provided by the SMMC, this Project site serves as a habitat for the Santa Monica Mountain’s evolutionarily significant mountain lion population, a State-listed candidate threatened species and currently receives all the protections of a listed threatened species [Exhibit 6]. The National Park Service, U.S. Department of the Interior, 2016 Map shows the Project site to be located in the P-22 Mountain Lion Home Range. [Exhibit 9].

Accordingly, a Class 32 CE is inappropriate.

III. Exceptions to the Categorical Exemptions Apply

CEQA also prohibits use of any CE when “there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.” (CEQA Guidelines § 15300.2(c)). The “unusual circumstances” exception is established without evidence of an environmental effect upon a showing that the project has some feature that distinguishes it from others in the exempt class, such as its size or location. *Berkeley Hillside Preservation v. City of Berkeley* (2015) 60 Cal.4th 1086. 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. *Id.* Alternatively, the “unusual circumstances” exception is established with evidence that the project will have a significant environmental effect. *Id.*

Even if considered to meet the requirements of CEQA Guidelines §15300.2(a) or the Class 32 qualifiers (which the Project clearly does not), this Project is unique in that it is being proposed within (1) an uncommon north-facing slope habitat of block 39L and (2) a critical narrow habitat “funnel” within block 39L, which serves as a protected habitat linkage between the Griffith Park core habitat area, of which this Project site is a part, and approximately ten acres of contiguous natural land located south lot.

Due to such unusual circumstances, it is a clearly established “reasonable probability” that the Project, which will physically cut off wildlife access in this critical habitat funnel area, severing the Griffith Park core habitat area from the ten acres of natural habitat to the south, will cause substantial adverse impacts on the environment, particularly habitat linkage/wildlife travel routes in habitat block 39L. Simply put, the Project will have a significant environmental impact.

For this reason and others stated above, the Project does not qualify for a Categorical Exemption.

IV. The Categorical Exemption Provides Incorrect and Incomplete Information


As described in detail in the letter from the SMMC, the CE adopted by Urban Forestry provides incomplete information and fails to recognize a plethora of impacts caused by the Project. Most glaringly, Urban Forestry has admitted to the Residents' Coalition that despite the requirements of the City's Protected Tree Ordinance (*see* LAMC Sec. 46.02, for example), Urban Forestry has not been provided the grading plans and has not assessed the grading impacts of the Project on the Oak Tree which is at the front of 2673 Bronholly (MRCA owned property) directly adjacent to the Project site. The City has been provided information that the proposed grading as well as the street widening will cause this Oak Tree to die.³

V. Conclusion

For all of these reasons, the City Council should grant the within appeal and require environmental review in connection with the Project.

Very truly yours,

LUNA & GLUSHON
A Professional Corporation



KRISTINA KROPP

³ The proposed site grading would come within two feet of the protected oak tree's trunk – well within the tree protection zone – according to the latest available civil plans. That close margin does not account for slough, remedial grading, or equipment maneuvering, and appears to flout even the developer's arborist recommendations.

EXHIBIT 1

EXHIBIT 1

RESOLUTION **PLANNING & LAND USE MANAGEMENT**

WHEREAS, the Santa Monica Mountains Conservancy (SMCC) was created by the California State Legislature through the Conservancy Act (Act) in 1979 to preserve thousands of acres of parkland for wildlife, native plants, and public recreation within the Santa Monica Mountains Zone (Zone) and since that time, it has helped to preserve and open to the public over 75,000 acres of parkland in both urban and wilderness settings; and

WHEREAS, Section 33001 of the Public Resources Code identifies the Zone as “unique and valuable economic, environmental, agricultural, scientific, educational, and recreational resource that should be held in trust for present and future generations;” and

WHEREAS, public agencies reviewing projects under California Environmental Quality Act (CEQA) must notify trustee agencies and consult with them at various points in the environmental review process; and

WHEREAS, a trustee agency is defined as “a state agency that has jurisdiction by law over natural resources affected by a project, that are held in trust for the people of the State of California;” and

WHEREAS, on July 26, 2021, the California Attorney General’s office issued an advice letter to the SMMC confirming that the SMMC must be considered a CEQA trustee agency for projects affecting natural resources in the Zone, as defined in the Act; and

WHEREAS, additionally SMMC’s Eastern Santa Monica Mountains Habitat Linkage Planning Map delineates the majority of habitat blocks and connecting wildlife corridors between the 405 and 101 freeways and should be considered for planning, conservation, and environmental impact analysis purposes; and


WHEREAS, it is a goal of the City to conserve and manage development in environmentally sensitive areas through efforts such as natural community conservation planning;

NOW, THEREFORE, BE IT RESOLVED, that by the adoption of this Resolution, the City of Los Angeles hereby recognizes the Santa Monica Mountains Conservancy as a trustee agency pursuant to the California Environmental Quality Act, which would require the City of Los Angeles to notify and consult with SMMC at various points in the CEQA review process on projects that may affect natural resources within the Santa Monica Mountains Zone, as defined in the Conservancy Act.

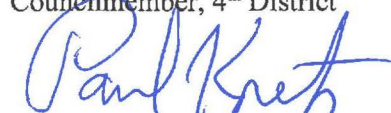
BE IT FURTHER RESOLVED, that the City of Los Angeles hereby recognizes the Big Wild-Topanga State Park, Eastern Santa Monica Mountains, and Griffith Park Area Habitat Linkage Habitat Linkage Planning Maps as well as future spatial habitat protection maps prepared by SMMC to ensure the protection and conservation of sensitive habitat areas.

PRESENTED BY:

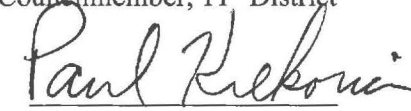

BOB BLUMENFELD
Councilmember, 3rd District

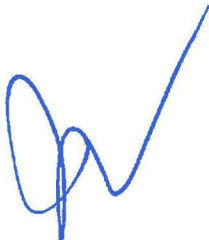

NITHYA RAMAN
Councilmember, 4th District


MIKE BONIN
Councilmember, 11th District


PAUL KRETZ
Councilmember, 5th District

SECONDED BY:


PAUL KREKORIAN
Councilmember, 2nd District



ORIGINAL

NOV 03 2021

EXHIBIT 2

EXHIBIT 2

ENERGY, CLIMATE CHANGE, ENVIRONMENTAL JUSTICE & RIVER

MOTION

The world is facing an extinction crisis. A 2019 report by the UN's Intergovernmental Science-Policy Platform on Biodiversity and Ecosystems Services warns that more than a million species face extinction within the next few decades. Besides climate change, a primary driver of wildlife extinction is habitat loss and fragmentation caused by uncoordinated and poorly-sited development and the lack of safe wildlife crossings across freeways and roads.

As a primary local example, Southern California mountain lions—like LA's famous Hollywood puma, P-22—are unable to roam freely to forage and seek mates. In 2019, the CA Fish and Wildlife (CFW) Commission voted to list Southern California mountain lions as a "candidate species" under the California Endangered Species Act, lest they go extinct. Entire ecosystems are similarly at risk within the California Floristic Province biodiversity hotspot.

In the proposed 2022-2023 City Budget, Mayor Garcetti has included funding for staff in the Department of City Planning to complete the Department's Wildlife Pilot Study. Numerous efforts are underway regionally and nationally to stave off this crisis, including: President Biden and Governor Newsom's 30% by 2030 conservation preservation plans; LA City's Biodiversity and Wildlife Corridors/Habitat Connectivity initiatives; LA County's Significant Ecological Areas and Wildlife Connectivity Ordinance; Ventura County's Wildlife Connectivity Ordinance; the Liberty Canyon Wildlife Crossing; Senator Alex Padilla's PUBLIC Lands Act; Congressman Adam Schiff's Rim of the Valley Corridor Preservation Act; the LA River Master Plan; the Arroyo Seco, San Rafael Hills, Verdugo Mountains, and San Gabriel Mountains conservation efforts; regional habitat conservation plans in Riverside, Orange, and San Bernardino Counties; and, SCAG's Connect SoCal Regional Wildlife Connectivity Plan.

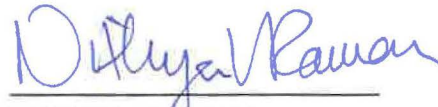
Our native wildlife do not abide by jurisdictional boundaries, however, and separate, disconnected wildlife preservation efforts run the risk of failure. Indeed, one habitat connectivity blockage can spoil the entire enterprise. An interconnected regional effort is essential for this work to succeed. The City of Los Angeles should thus partner and coordinate with neighboring jurisdictions to pool resources, staff, funding, and expertise to ensure that our wildlife connectivity efforts are themselves connected.

I THEREFORE MOVE that the City Council instruct LA Sanitation and Environment (LASAN), in partnership with the LASAN Biodiversity Expert Council and the Department of City Planning, to participate in convenings with local and regional jurisdictions and conservation and environmental justice stakeholders for the purpose of sharing best practices, information, and resources, with the aim of developing a Regionwide Wildlife Habitat Connectivity Plan encompassing LA County and Ventura County, connecting the Rim of the Valley to the LA River and Arroyo Seco and the Verdugo and San Gabriel Mountains, and beyond.


APR 26 2022

▪ **I FURTHER MOVE** that the City Council instruct the Department of City Planning, in consultation with LASAN, the Department of Building and Safety, and the City Attorney, to report back on or before October 22, 2022, P-22 Day, with a plan for the expansion of the Wildlife Ordinance to cover the additional Protection Areas for Wildlife (PAWs), including the Rim of the Valley areas within the boundaries of the City of Los Angeles.

PRESENTED BY:



NITHYA RAMAN
Councilmember, 4th District

 (For CM KREKORIAN)

PAUL KREKORIAN
Councilmember, 2nd District



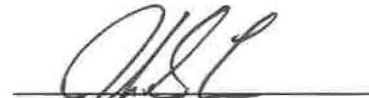
PAUL KORETZ
Councilmember, 5th District



MONICA RODRIGUEZ
Councilmember, 7th District

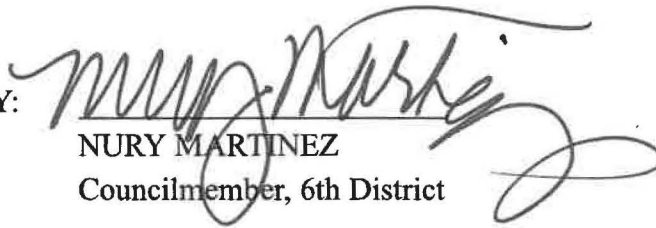


MIKE BONIN
Councilmember, 11th District



JOHN LEE
Councilmember, 12th District

SECONDED BY:



NURY MARTINEZ
Councilmember, 6th District

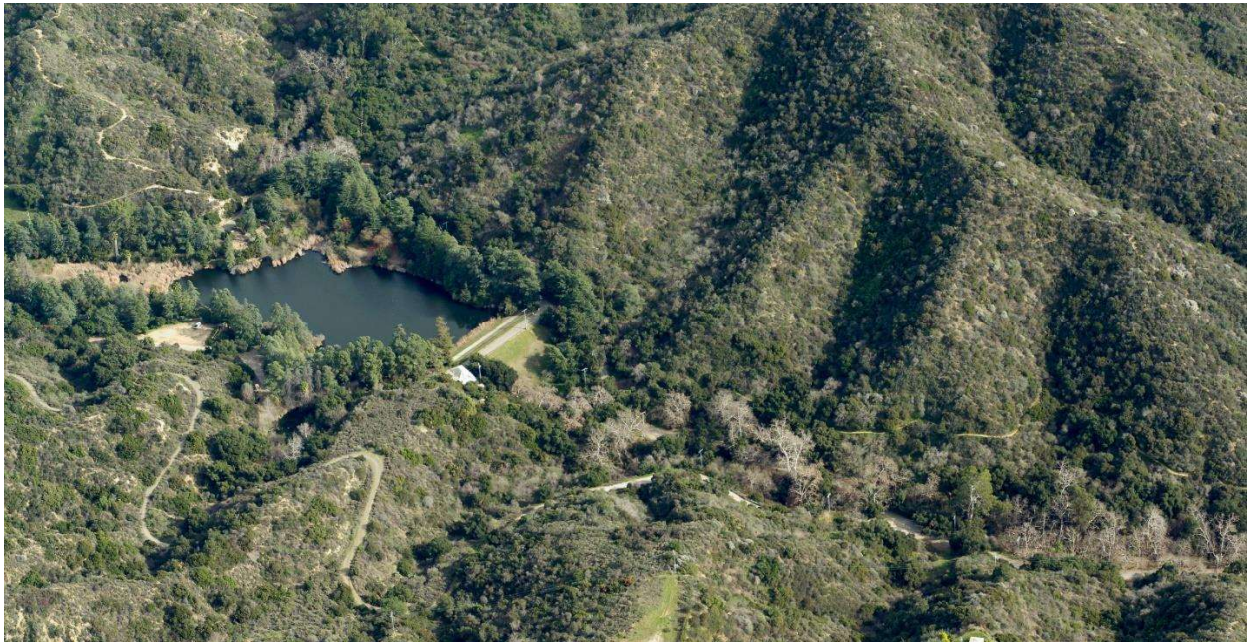
ORIGINAL

EXHIBIT 3

EXHIBIT 3

Eastern Santa Monica Mountains Natural Resource Protection Plan

Adopted by the Santa Monica Mountains Conservancy
State of California – December 13, 2021



Upper Franklin Canyon Reservoir

Contact - Paul Edelman
Deputy Director for Natural Resources and Planning
edelman@smmc.ca.gov

Eastern Santa Monica Mountains Natural Resource Protection Plan

Adopted by the Santa Monica Mountains Conservancy, State of California

December 13, 2021

The goal of this Eastern Santa Monica Mountains Natural Resource Protection Plan (NRPP) is to provide a baseline document that successfully guides all forms of land protection in the portion of the Santa Monica Mountains between Topanga Canyon Boulevard (State Route 27) and the eastern boundary of Griffith Park. Figure 1 shows the proposed Plan boundary. The boundary is dictated by the outer perimeter of the mapped habitat blocks in the following three habitat planning maps adopted by the Conservancy to date (Figures 2, 3 and 4). The *Big Wild - Topanga State Park Core Habitat Area Planning Map* was adopted in June of 2021. The *Eastern Santa Monica Mountains Habitat Linkage Planning Map* was first adopted in January 2017, updated in 2020, and again most recently in April 2021. The *Griffith Park Area Habitat Linkage Planning Map* was adopted in December 2017.

Habitat connectivity in the eastern Santa Monica Mountains is under extreme threat from all forms of development. Multiple prior options for wildlife to move east to west between the 405 freeway and the Mulholland Drive bridge over the 101 freeway in the Cahuenga Pass and into the Griffith Park area have been permanently foreclosed in the last five years alone. This Plan focuses on connectivity via the existing system of non-contiguous habitat blocks (habitat patches) and the pathways that wildlife use to travel between them. Without adequate habitat connectivity at multiple landscape scales, the subject Plan area natural systems will continue to decline.

The principal CEQA lead agency for development in the Plan area is the City of Los Angeles. To date, the City has rejected both the use and scientific validity of the three above-referenced Conservancy planning maps. The maps are not used in the City's environmental reviews within the Plan area. A next step to provide more information for the City to consider in its land use planning and decisions is to combine the three maps into a single unified natural resource protection plan that identifies lands to conserve.

Natural Resource Protection Plans that identify lands for conservation are foundational to the protection of all ecosystems. The Santa Monica Mountains Comprehensive Plan (adopted 1979) specifically identified many significant lands to be protected from Point Mugu to Cahuenga Peak by Griffith Park. Los Angeles County recognized Griffith Park as a Significant Ecological Area (SEA) in the 1980s. The National Park Service's Santa Monica Mountains National Recreation Area Land Protection Plan (Figure 6) prioritizes most parcels in the central and western part of the range but excludes significant natural

Eastern Santa Monica Mountains Natural Resource Protection Plan

December 13, 2021

Page 2

areas east of Topanga Canyon Boulevard and north of Mulholland Drive. Most undeveloped and underdeveloped parcels in the eastern Santa Monica Mountains are not included in any adopted natural resource protection plan that identifies lands for conservation. These are regionally significant resources that warrant the best available natural resource protection plan.

To address this issue, this Natural Resource Protection Plan (NRPP) fuses the three adopted Conservancy planning maps together so that the entire east to west habitat linkage system can be looked at as a unified system. The Conservancy's actions on its three adopted planning maps emphasized that ground conditions change and thus the maps should be iterative and be readopted regularly to reflect new conditions. The same rationale applies to this NRPP for the eastern Santa Monica Mountains. In most cases the changes will represent increased development and reduced connectivity.

All three adopted Conservancy planning maps show the precise boundaries of undeveloped habitat blocks between Topanga Canyon Boulevard (State Route 27) and the eastern boundary of Griffith Park. All three maps accurately show both known and probable habitat linkage/wildlife travel routes between otherwise disconnected habitat blocks. All three maps overlay the most currently then available Los Angeles County Assessor's parcel line data.

The three maps fit together to represent a single habitat system that currently possesses enough function for individuals of most larger wildlife species periodically to successfully cross the San Diego (405) freeway in several locations in the Sepulveda pass and the Hollywood (101) freeway in the Cahuenga Pass in at least one location. National Park Service tracking data and citizen reports confirm there is some mountain lion breeding in the 20,000-acre Big Wild - Topanga State Park core habitat area. This area is the main source for new animals and new genetic material to move eastward in the range to the Griffith Park core habitat area. Likewise juvenile animals can disperse across the 405 freeway westward into the Big Wild. The locations of these existing freeway crossing structures are shown on Figures 2, 3, and 4.

A goal of this Plan is also to emphasize the importance of protecting the few remaining viable habitat linkages across the cross mountain busy arterial roadways that include Sepulveda Boulevard, Beverly Glen Boulevard, Benedict Canyon Drive, Coldwater Canyon Avenue, and Laurel Canyon Boulevard. Metro is also planning a new rail route through the Sepulveda Pass.

Another goal of this Plan is to recognize the ecological value of all mapped habitat blocks. Outlier habitat blocks offer refuge for birthing and raising young, as escape locations from wildfire, refuge from predators, and generators of small prey animals.

The three Conservancy adopted planning maps combined into a unified NRPP provides the needed baseline document with precise parcel boundaries to address potential parcel specific impacts. There is no question that development continually changes baseline ground conditions on many parcels. In addition, fine scale biological land use analyses require some current ground truthing. However, without a solid and comprehensive baseline map with delineated habitat blocks and their potential connectivity routes, no biological impact assessment can be adequate.

This NRPP addresses habitat connectivity for all plant and animal species. The new candidate status of the local mountain lion population under the California Endangered Species Act adds urgency to the issue. All portions of the Santa Monica Mountains that mountain lions manage to reach represent habitat for the now State candidate threatened evolutionarily significant mountain lion population. Security camera footage in the Plan area shows that no habitat block mapped in the Plan can be considered unreachable and usable by mountain lions. Eastern Santa Monica Mountain's mountain lions regularly use paved public streets and private yards to move between habitat areas. This camera data frequently confirms the function of mapped wildlife movement routes particularly on the *Eastern Santa Monica Mountains Habitat Linkage Planning Map*. The camera data also reveals new, large mammal travel routes through developed neighborhoods.

Ground truthing for habitat linkages on all private lands for an area this large is not financially feasible and would require obtaining permission from thousands of property owners. Street-facing walls and fences and thick tree canopy cover hide many potentially used wildlife travel routes that remain to be discovered on a case-by-case basis.

Conservation biology and reserve design both stress the need for redundancy in the connections between habitat areas. In the case of the Plan area, that is particularly true when under current City of Los Angeles entitlement conditions, a large habitat block, or even a large portion of the Plan area, could be permanently severed by a new, lone single-family home or remodel expansion approved under a Categorical Exemption.

Figure 5 shows mapped perennial water sources for wildlife in the Plan area east of the 405 freeway. This mapping is from a Conservancy-funded collaboration with the Mountains Recreation and Conservation Authority.

Public Resources Code Section 33001 states:

"The Legislature hereby finds and declares that the Santa Monica Mountains Zone, as defined in Section 33105, is a unique and valuable economic, environmental, agricultural, scientific, educational, and recreational resource that should be held in trust for present and future generations; that, as the last large undeveloped area contiguous to the shoreline within the greater Los Angeles metropolitan region, comprised of Los Angeles and Ventura Counties, it provides essential relief from the urban environment; that it exists as a single ecosystem in which changes that affect one part may also affect all other parts; and that the preservation and protection of this resource is in the public interest."

The Santa Monica Mountains Conservancy (Conservancy) is a CEQA Trustee agency because it is a state agency which has jurisdiction over the natural resources of the Zone. The Conservancy was created to address fractured land use in the Santa Monica Mountains that negatively impacts recreational and environmental values. This NRPP is the best available resource to identify lands needed for conservation.

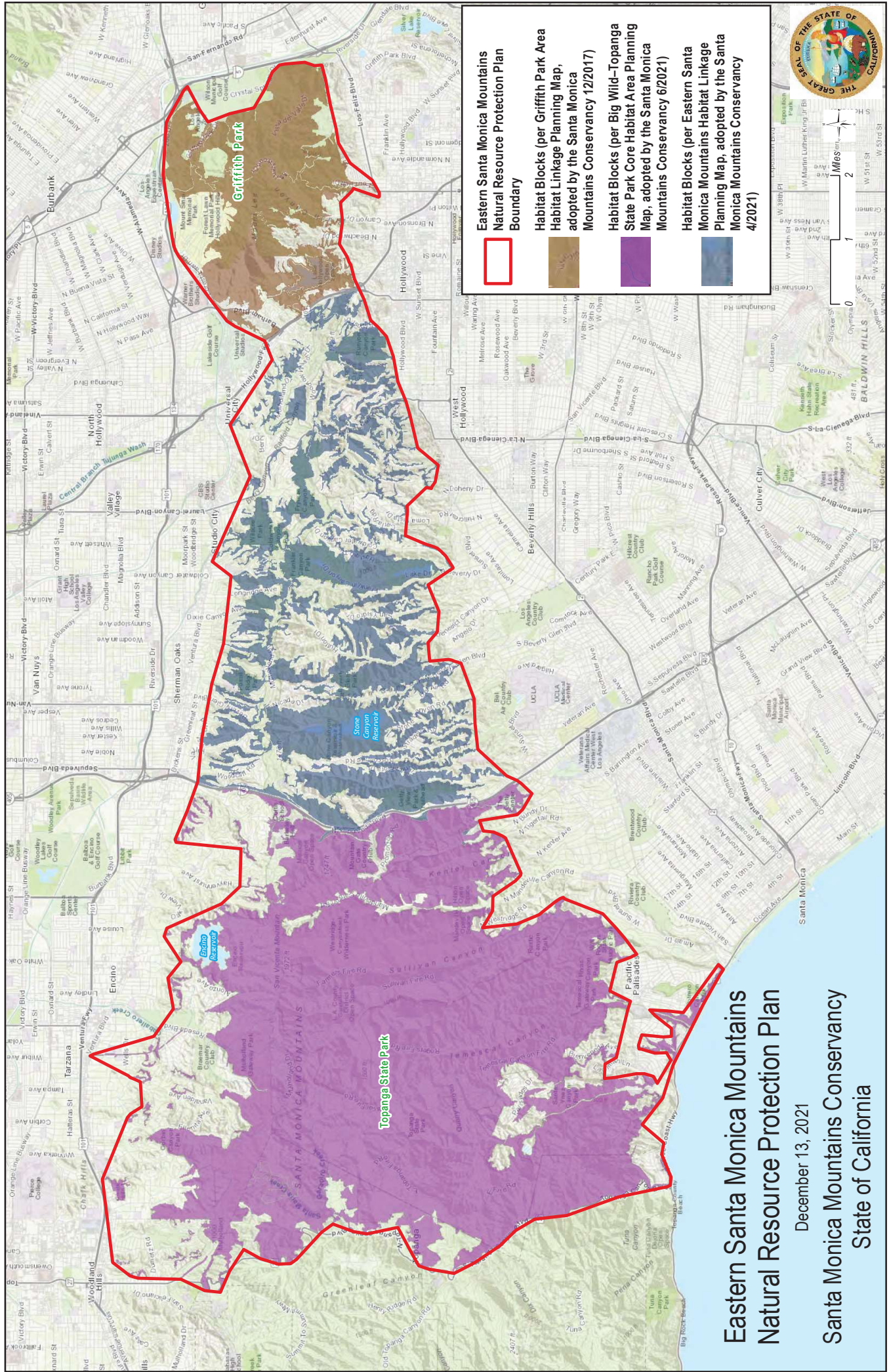
Notes on Mapping Methodologies

The three habitat planning maps are all constructed by GIS staff using the best available electronic data and some ground truthing. The perimeters of habitat blocks are depicted from the most recent and highest resolution aerial photography publically available at the time of adoption. Most often that is Google Earth aerial photography. Often back year aerial photography shows a particular sub-area much better than the most current available photography. The accuracy of the lines showing habitat connections are often enhanced with Google Earth street view photography.

For the subject *Big Wild - Topanga State Park Core Habitat Area Planning Map* the aerial photography within the delineated habitat blocks is from February 2, 2020 0.5 meter MAXAR aeriels from ESRI base maps. The area shown outside the habitat blocks is based on 2014 LARIAC data. All the subject area is covered by the Google Earth 2020 aerial photography layer. The Conservancy does not have access to the County's 2019 LARIAC data.



- Eastern Santa Monica Mountains Natural Resource Protection Plan Boundary
- Habitat Blocks (per Griffith Park Area Habitat Linkage Planning Map, adopted by the Santa Monica Mountains Conservancy 12/2017)
- Habitat Blocks (per Big Wild-Topanga State Park Core Habitat Area Planning Map, adopted by the Santa Monica Mountains Conservancy 6/2021)
- Habitat Blocks (per Eastern Santa Monica Mountains Habitat Linkage Planning Map, adopted by the Santa Monica Mountains Conservancy 4/2021)

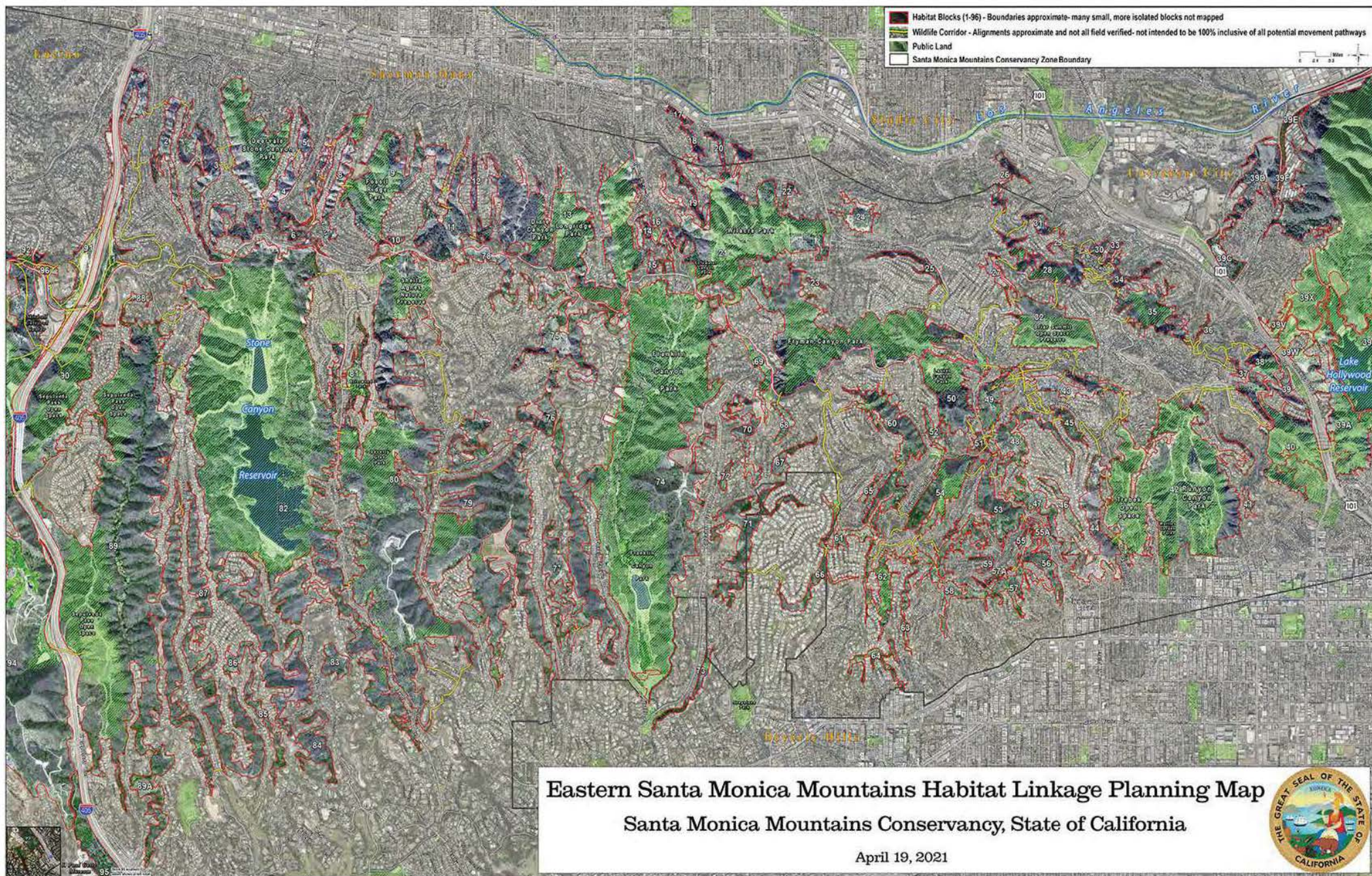


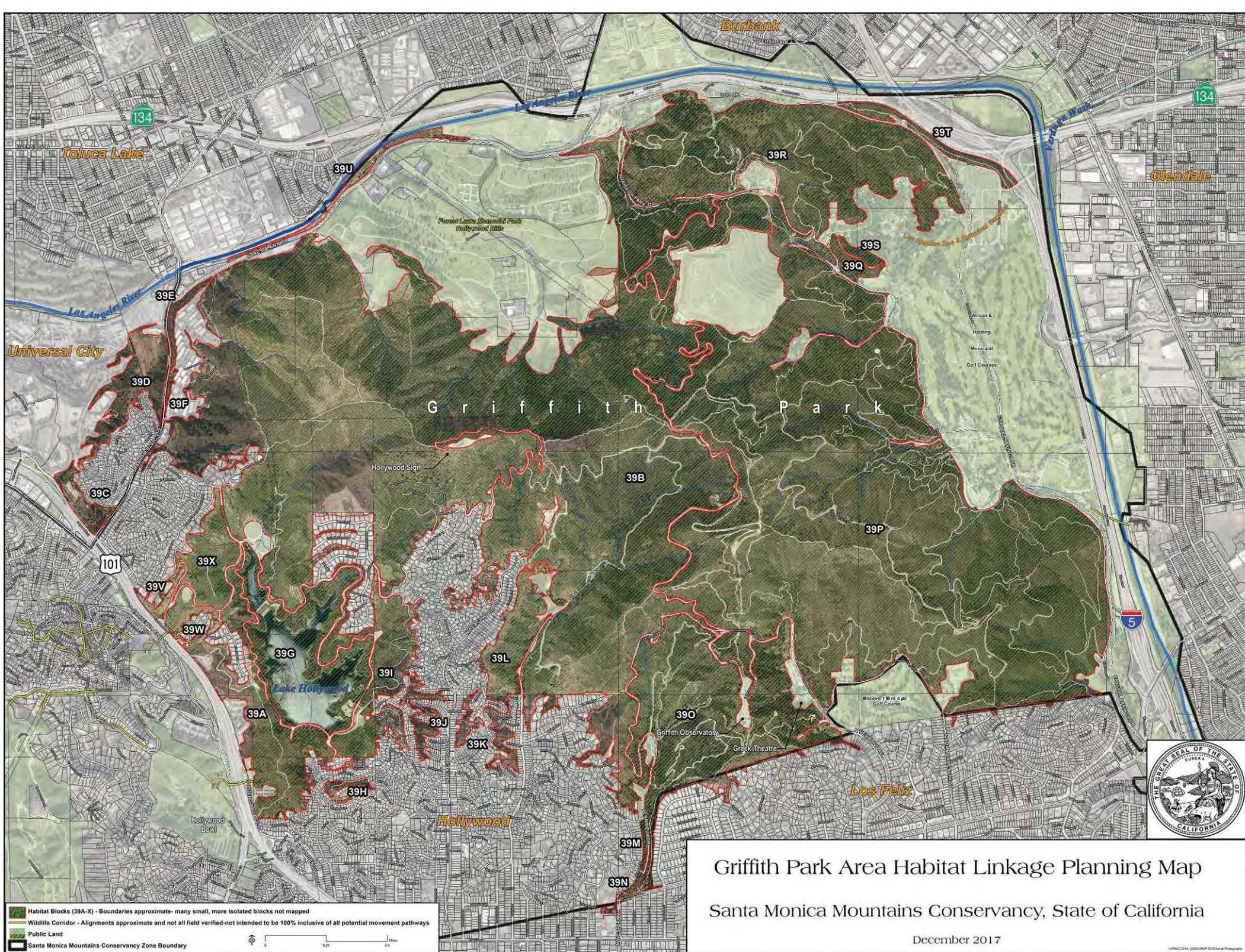
**Eastern Santa Monica Mountains
Natural Resource Protection Plan**

December 13, 2021

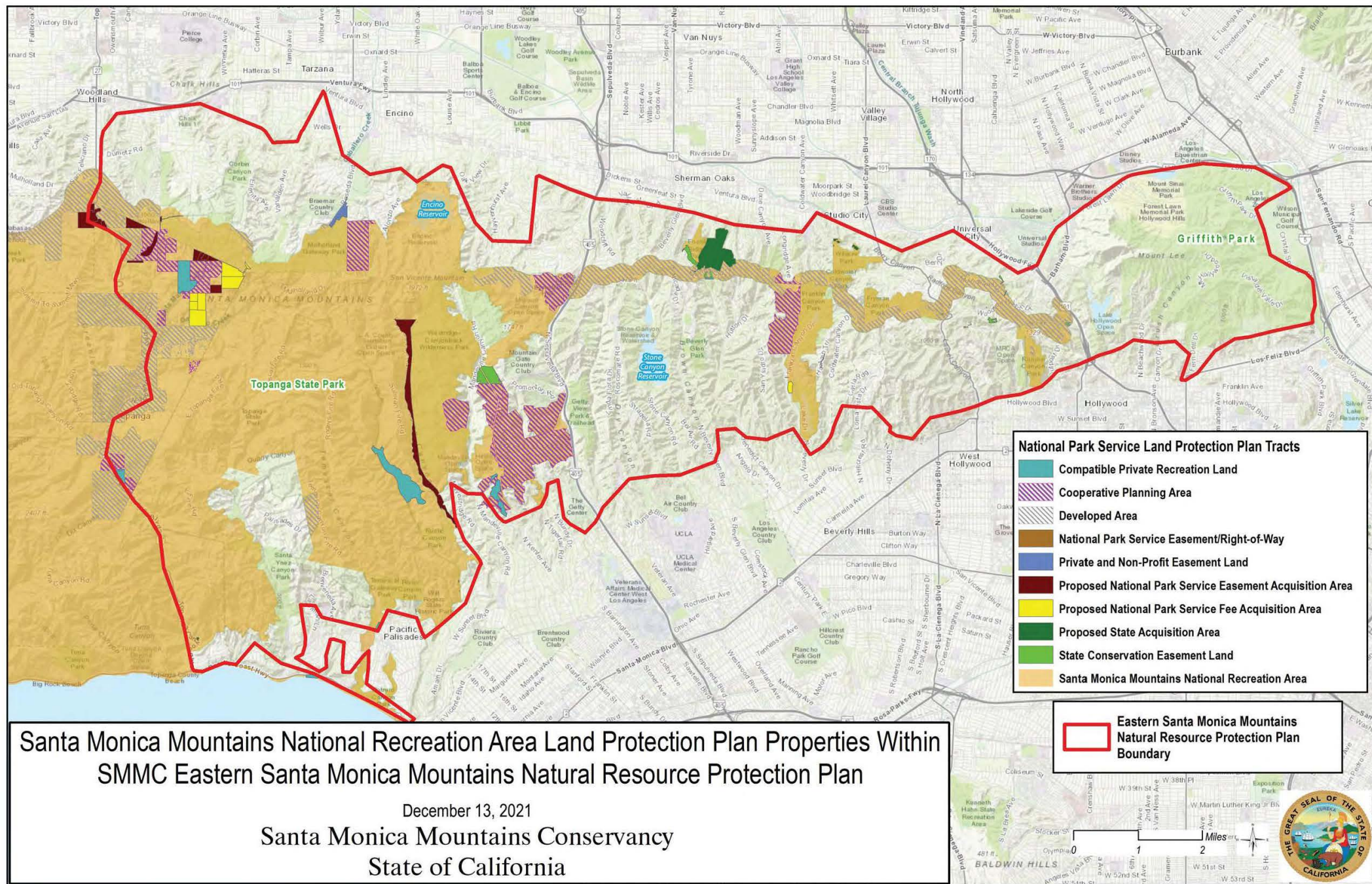
Santa Monica Mountains Conservancy

State of California









Memorandum

To : The Conservancy
The Advisory Committee

December 13, 2021

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

Subject: **Consideration of resolution adopting Eastern Santa Monica Mountains Natural Resource Protection Plan, City of Los Angeles.**

Staff Recommendation:

That the Conservancy adopt the attached resolution adopting an Eastern Santa Monica Mountains Natural Resource Protection Plan, City of Los Angeles.

Legislative Authority:

Section 33211 of the Public Resources Code.

Background:

Natural Resource Protection Plans that identify lands for conservation are foundational to the protection of all ecosystems. The Santa Monica Mountains Comprehensive Plan (adopted 1979) specifically identified many significant lands to be protected from Point Mugu to Cahuenga Peak by Griffith Park. Los Angeles County recognized Griffith Park as a Significant Ecological Area (SEA) in the 1980s. The National Park Service's Santa Monica Mountains National Recreation Area Land Protection Plan prioritizes most parcels in the central and western part of the range but excludes significant natural areas east of Topanga Canyon Boulevard and north of Mulholland Drive. Most undeveloped and underdeveloped parcels in the eastern Santa Monica Mountains are not included in

any adopted natural resource protection plan that identifies lands for conservation. These are regionally significant resources that warrant the best available natural resource protection plan.

To address this issue, staff has prepared a Natural Resource Protection Plan (NRPP) that embodies the following three eastern Santa Monica Mountains habitat planning maps that the Conservancy has adopted to date. The *Big Wild - Topanga State Park Core Habitat Area Planning Map* was adopted in June of 2021. The *Eastern Santa Monica Mountains Habitat Linkage Planning Map* was first adopted in January 2017, updated in 2020, and again most recently in April 2021. The *Griffith Park Area Habitat Linkage Planning Map* was adopted in December 2017. The scope of the proposed Eastern Santa Monica Mountains NRPP is essentially defined by the outer limits of these three adopted planning maps. Just as the Conservancy's action on these three maps have emphasized, ground conditions change and thus the maps and also a new NRPP should be iterative and be readopted regularly with changes.

All three of these maps show the precise boundaries of undeveloped habitat blocks between Topanga Canyon Boulevard (State Route 27) and the eastern boundary of Griffith Park. All three maps accurately show both known and probable habitat linkage/wildlife travel routes between otherwise disconnected habitat blocks. All three maps overlay the most currently then available Los Angeles County Assessor's parcel line data.

The three maps fit together to represent a single habitat system that currently possesses enough function for individuals of most larger wildlife species to periodically successfully cross the San Diego (405) freeway in several locations in the Sepulveda pass and the Hollywood (101) freeway in the Cahuenga Pass in at least one location. National Park Service tracking data and citizen reports confirm there is some mountain lion breeding in the 20,000-acre Big Wild - Topanga State Park core habitat area. This area is the main source for new animals and new genetic material to move eastward in the range to the Griffith Park core habitat area.

The combination of freeways, roads, development pressure, existing habitat fragmentation, smaller parcel sizes, lack of political conviction, and other factors place the eastern Santa Monica Mountains at greater risk for continued rapid habitat fragmentation leading to the loss of wildlife species. The subject area is all part of the Santa Monica Mountains Zone.

Public Resources Code Section 33001 states:

"The Legislature hereby finds and declares that the Santa Monica Mountains Zone, as defined in Section 33105, is a unique and valuable economic, environmental, agricultural, scientific, educational, and recreational resource that should be held in trust for present and future generations; that, as the last large undeveloped area contiguous to the shoreline within the greater Los Angeles metropolitan region, comprised of Los Angeles and Ventura Counties, it provides essential relief from the urban environment; that it exists as a single ecosystem in which changes that affect one part may also affect all other parts; and that the preservation and protection of this resource is in the public interest."

The combination of freeways, roads, development pressure, existing habitat fragmentation, smaller parcel sizes, lack of political conviction, and other factors place the eastern Santa Monica Mountains at exceptional risk for continued rapid habitat fragmentation leading to the permanent loss of wildlife species. For example the subject eastern section of the range is bisected by multiple busy arterial roadways that include: Sepulveda Boulevard, Beverly Glen Boulevard, Benedict Canyon Drive, Coldwater Canyon Avenue, and Laurel Canyon Boulevard. Metro is planning a new rail route through the Sepulveda Pass.

All proposed NRPP area planning entitlement decisions east of Topanga State Park are made by the City of Los Angeles (other than Metro and Caltrans). To date the City Planning Department and City Attorney's office have rejected both the planning and scientific validity of the Conservancy's three maps on the grounds that they are not precisely mapped and that the Conservancy staff does not have adequate knowledge or standing to prepare such maps. There is no better expertise in the world on these habitat and linkage issues than the Conservancy staff.

No approved City planning documents recognize either specific habitat blocks or habitat linkages (wildlife corridors, wildlife travel routes). City land use decisionmakers have no baseline map or document that recognize the values of any habitat block or any habitat linkage in the proposed NRPP area. As a result, habitat connectivity, particularly leading up to and east of the 405 freeway, is at great risk. The new candidate status of the mountain lion under the California Endangered Species Act adds urgency to the issue. The three Conservancy adopted planning maps combined into a unified

NRPP provides that needed baseline document at parcel line scale to address potential parcel specific impacts. Development continually changes baseline ground conditions. Furthermore, the finest scale land use analyses require up to date ground truthing, but without a solid and comprehensive baseline, no habitat impact assessment can be adequate.

The Santa Monica Mountains Conservancy (Conservancy) is a CEQA Trustee agency because it is a state agency which has jurisdiction over the natural resources of the Zone. The Conservancy regularly comments on development projects that affect natural resources within the Zone. The Conservancy was created to address fractured land use in the Santa Monica Mountains that negatively impacts recreational and environmental values. The Conservancy is the public agency best suited to prepare a Natural Resource Protection Plan (Plan) for the eastern Santa Monica Mountains.

This month the Los Angeles City Council approved a motion, proposed by all five hillside councilmembers, for the Planning Department to report back in 90 days with an analysis that assesses and identifies parcels of land that are appropriate for conservation as determined by trustee agencies such as the Conservancy. It further called for the Planning Department to report back within 90 days with an update on existing and future natural community conservation efforts such the City's Wildlife Pilot Study, Ridgeline Protection Ordinance, and Hillside Construction Regulations. It finally requires another report on the Planning Director's memorandum that unilaterally removed most projects in the Mulholland Specific Plan Area from review by the Mulholland Design Review Board. The City cannot be relied upon to produce its own natural resource protection plan that identifies lands for permanent conservation.

A second motion again proposed by all five hillside councilmembers, recognizes the Conservancy as a trustee agency for projects that may affect natural resources in the Santa Monica Mountains Zone. It further recognizes the above three referenced Conservancy-adopted Planning Maps as well as future spatial habitat protection maps prepared by the Conservancy to ensure the protection and conservation of sensitive habitat areas. The City Attorney's office is advising those Councilmembers not to recognize the Conservancy's maps because of pending litigation. However, even before that private litigation was instigated, the City Attorney's office had repeatedly claimed that the Conservancy's maps were not valid for a multitude of reasons not based in fact. Staff will continue to work with the City Council toward adoption of this second motion.

Given the Planning Department's and the City Attorney's ongoing rejection of the Conservancy's maps, more planning tools are necessary to affect land use entitlement outcomes in the City's hillside areas. Unfortunately now, months after the comment period closed, a small but vocal group of residents is attempting to gut the City's nearly-completed Wildlife Ordinance which would have required some land protection through development application approvals but would not have identified lands for conservation. On the other hand, private litigation is chipping away, case by case, at the City's resistance to habitat protection and recognition of wildlife corridors. Staff has begun to work with staff from the California Department of Fish and Wildlife (CDFW) on ways to pressure the City to now recognize that all of the Santa Monica Mountains represent habitat for the now State candidate threatened evolutionarily significant mountain lion population. The adoption of the proposed NRPP is part of this uphill climb to maintain species diversity in the Santa Monica Mountains from Griffith Park to Topanga State Park all within the City boundary.

The presence of the proposed NRPP will complement efforts of the CDFW as a co-trustee agency for the plan area. It will also help solidify baseline justifications for individuals donating property interests in navigating with the IRS. It further will be helpful to bolster grant applications for funding to further protect or enhance natural lands.

Attached:

[Eastern Santa Monica Mountains Natural Resource Protection Plan](#)

[ESSM Habitat Linkage Planning Map 5 2021a](#)

[Griffith Park Area Habitat Linkage Planning Map](#)

[Santa Monica Mountains Conservancy Big Wild – Topanga State Park Core Habitat Area Planning Map 6 2021](#)

[ESSM-Habitat-Linkage-Planning-Map-5-2021a4](#)

[Griffith Park Area Habitat Linkage Planning Map5](#)

[Eastern Santa Monica Mountains Natural Resource Protection Plan water sources6](#)

December 13, 2021

Resolution No. 21-73

RESOLUTION OF THE SANTA MONICA MOUNTAINS CONSERVANCY
AUTHORIZING ADOPTING EASTERN SANTA MONICA MOUNTAINS NATURAL
RESOURCE PROTECTION PLAN, CITY OF LOS ANGELES

WHEREAS, a natural resource protection plan is essential to prevent the loss of species in the Santa Monica Mountains east of Topanga Canyon Boulevard (State Route 27);

WHEREAS, the Santa Monica Mountains Comprehensive Plan and the National Park Service's Santa Monica Mountains National Recreation Area Land Protection Plan only identify a limited number significant lands to protect east of Topanga Canyon Boulevard;

WHEREAS, the Conservancy is a State trustee agency for natural resources within the Santa Monica Mountains Zone;

WHEREAS, the Conservancy has adopted three precise and detailed habitat planning maps for the portion of the range between Topanga Canyon Boulevard and the eastern boundary of Griffith Park;

WHEREAS, the proposed Eastern Santa Monica Mountains Natural Resource Protection Plan identifies specific properties for permanent conservation in the Santa Monica Mountains Zone;

WHEREAS, the proposed Eastern Santa Monica Mountains Natural Resource Protection Plan identifies the boundaries of specific habitat blocks and connecting habitat linkages overlain with Los Angeles County Assessor's parcel data;

WHEREAS, all portions of the proposed Natural Resource Protection Plan are located within the Santa Monica Mountains Zone;

WHEREAS, the Santa Monica Mountains Conservancy is the principal State planning agency for the Santa Monica Mountains; and

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

1. FINDS that the proposed action is consistent with the Santa Monica Mountains Comprehensive Plan;
2. FINDS that the proposed action is consistent with the Conservancy's Strategic Objectives;

3. FINDS that the proposed Eastern Santa Monica Mountains Land Protection Plan identifies critical lands to conserve;
4. FINDS that the proposed action is exempt from the provisions of the California Environmental Quality Act (CEQA);
5. ADOPTS the staff report and recommendation dated December 13, 2021 for this item;
6. ADOPTS all of the preceding whereas clauses;
7. AUTHORIZES adoption of the Eastern Santa Monica Mountains Natural Resources Protection Plan; and
8. FURTHER AUTHORIZES the Executive Director to perform any and all acts necessary to carry out this resolution; without limiting the generality of the foregoing, such authority shall include those provisions that he shall determine in the exclusive exercise of his discretion are necessary to carry out the purposes of this resolution and to comply with the policies of the Conservancy, and to otherwise carry out the provisions of state law and regulations.

~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 December 13, 2021 at various locations via videoconferencing, California.

Date: December 13, 2021


Executive Director

EXHIBIT 4

EXHIBIT 4

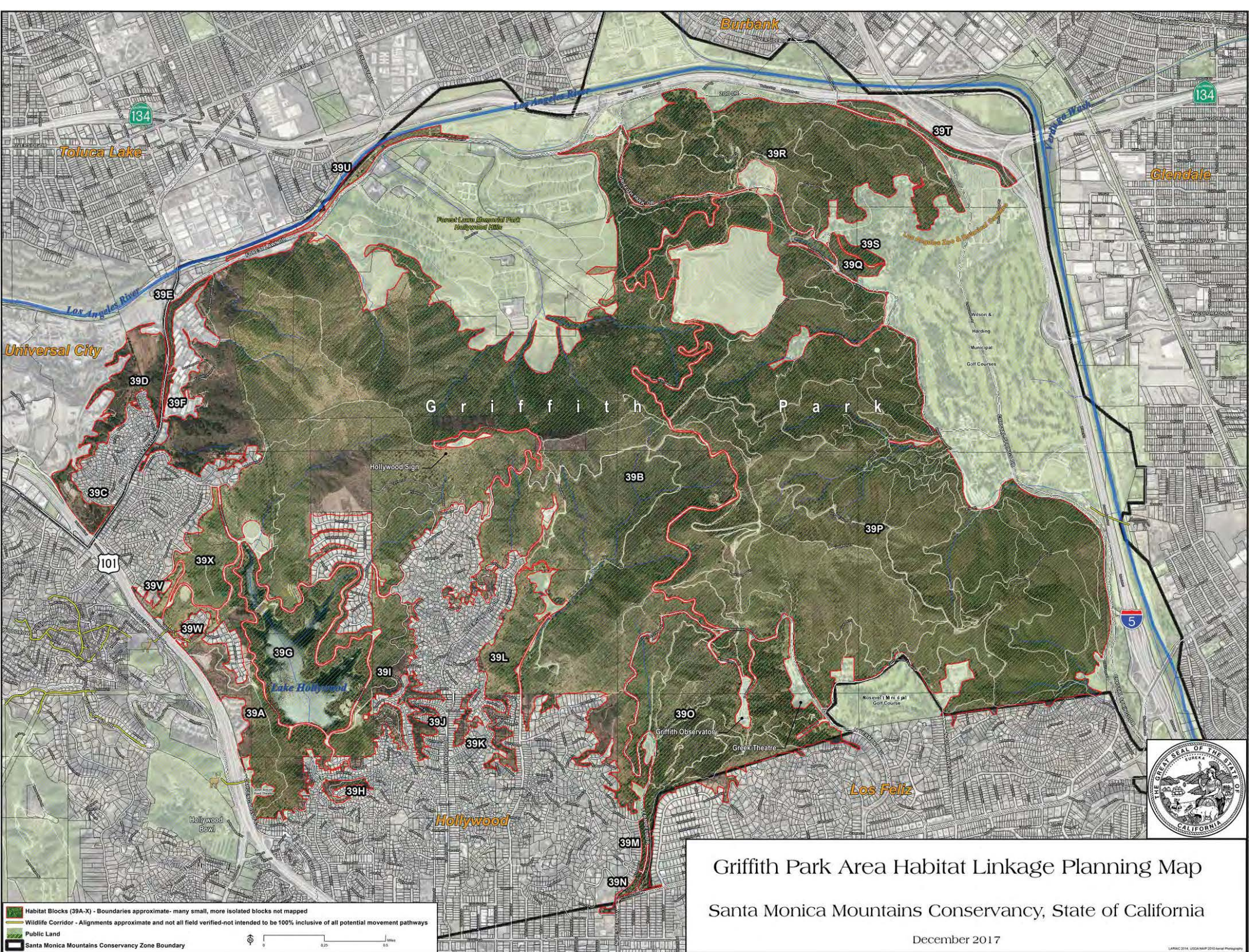


EXHIBIT 5

EXHIBIT 5

Griffith Park

Carolus Dr

Habitat Block 39L

Bronholly Dr

Habitat Block 39L
(continues further south)

2669 Bronholly Drive, APN 5580-018-020

Mountains Recreation & Conservation Authority
Parkland

Griffith Park

Habitat Blocks (per Eastern Santa Monica Mountains
Habitat Linkage Planning Map, adopted by the Santa
Monica Mountains Conservancy April 19, 2021)

0 25 50 Feet



EXHIBIT 6

EXHIBIT 6

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



May 6, 2022

Los Angeles City Council
Public Works Committee
City Hall
200 N. Spring Street
Los Angeles, California 90012

Support for CEQA Appeal – CF 22-0499
Notice of Categorical Exemption
2669 N. Bronholly Drive – Griffith Park Ecosystem

Honorable Councilmembers:

As a CEQA trustee agency for the Santa Monica Mountains, the Santa Monica Mountains Conservancy (Conservancy) urges the City Council to support the above-referenced CEQA appeal of a project contiguous with the Griffith Park core habitat area and adjacent to wooded public-owned open space. A less damaging project is essential for the public trust.

To adequately maintain vital habitat connectivity through narrow-width natural areas, impact analyses of proposed hillside developments must address all potential adverse effects on – in this case - the precisely mapped habitat blocks in the Conservancy's 2017 adopted *Griffith Park Area Habitat Linkage Planning Map*. The subject Categorical Exemption includes no habitat linkage analysis or mention.

The project is in the Santa Monica Mountains Zone as defined in Section 33105 of the Public Resource Code. The State legislature has declared that the zone represents an environmental resource of critical concern. Los Angeles County has also designated the Griffith Park natural area as a Significant Ecological Area (SEA).

The potential impacts of this project have not been analyzed as a development proposal within a critical environmental resource of concern. The proposed project property is a key connectivity element within habitat block 39L of the *Griffith Park Area Habitat Linkage Planning Map*. Habitat block 39L includes an approximately 10.5-acre peninsula of natural land that is seamlessly connected to the greater Griffith Park ecosystem. The subject 2669 N. Bronholly project is located in the most-narrow of all choke points within this southern extension of precisely mapped habitat block 39L. In short, being at the most-narrow choke point, any project proximate to that critical choke

point has the enhanced potential to sever approximately ten acres of habitat from the larger ecosystem, in particular the movement of larger mammals, reptiles, and ground birds--such as California quail. As a choke point element that keeps 10 acres of precisely mapped habitat connected to the fragile Griffith Park ecosystem, the subject parcel is a critical environmental resource of concern. Attached maps show how the proposed project footprint closes off this chokepoint.

For the following reasons, the Conservancy urges the City Council to fully support the CEQA appeal from the Bronholly & Carolus Residents Coalition and to deny adoption of the Categorical Exemption issued by the Bureau of Street Services. We urge the City Council to deny the Categorical Exemption with prejudice and require a Mitigated Negative Declaration as the minimum level of CEQA review for residential development of the subject property. To ensure long-term habitat connectivity, the same standard should apply for other private lots within this described choke point of the southern extension of habitat block 39L.

Furthermore, any categorical exemption cannot be utilized where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances including a habitat linkage choke point in an imperiled urban ecosystem of regional significance.

Project Description is Incomplete

The project description in the Categorical Exemption is inadequate in multiple ways. The project description **does not include** the following direct impacts on adjacent public parkland (APN 5580-018-903) owned by the Mountains Recreation and Conservation Authority (MRCA):

- 1) Trenching for a sewer line connection on MRCA fee simple land to reach a City easement shown on the civil plans.
- 2) Additional annual required 200-foot brush clearance on MRCA public land containing City protected trees.
- 3) Substantial alteration of (above ground and subsurface) drainage patterns to a protected coast live oak and its root system on public land from project specific grading and street widening.
- 4) Grading on MRCA land for a depicted rear lot accessory structure with its related infrastructure.

- 5) Undermining a steep roadside slope on MRCA parkland by expanding a section of road in a public right-of-way that narrows to a width of less than 16 feet in front of the above-described public open space.

The project description is further deficient because it does not address the project being in an element of a State-adopted Natural Resource Protection Plan (NRPP). Specifically, the project is in a precisely mapped habitat block (39L) in the Conservancy's 2017 *Griffith Park Area Habitat Linkage Planning Map* that has long been made available to the City Planning Department. That linkage planning map is an element of the Conservancy's 2021 *Eastern Santa Monica Mountains NRPP*.

The project description is further deficient because it does not address the project being located within the habitat of a small sub-population of the State-listed candidate threatened southern California mountain lion. The project habitat is indisputably connected to the Griffith Park core habitat area and is frequented by mule deer, the lions' preferred prey.

A further deficiency of the project description is a failure to disclose proposed offsite grading on other private property along the southwest property boundary related to a proposed accessory structure.

Perhaps the most glaring deficiency of the project description is the absence of any mention of the proposed rear-yard accessory structure and its' related infrastructure on the submitted civil plans.

The failure to date to analyze the potential impacts of the proposed accessory structure and its related infrastructure constitutes project piecemealing.

The Categorical Exemption cannot be adopted because the project description is grossly incomplete.

Lack of Habitat Linkage Avoidance or Mitigation

The proposed project would not maintain a permanent protected habitat linkage between the Griffith Park core habitat area and approximately ten acres of contiguous natural land located south of the subject lot in habitat block 39L. Such a wildlife movement linkage currently exists through the property via the absence of any human constructed barriers and the presence of a broad swath of contiguous navigable terrain

and overall high-quality natural vegetation cover. This project's design failure to avoid or mitigate for impacts to a habitat chokepoint that could sever approximately 10 acres from the contiguous habitat area of the Griffith Park ecosystem remains a significant, unmitigated biological impact.

Both the southernmost ten acres of habitat block 39L, and the cluster of parcels (including 2669 N. Bronholly Drive) that form a chokepoint between Griffith Park proper and the ten acres, collectively constitute an environmental resource of critical concern identified by the Conservancy, a State agency under the Natural Resources Agency. A categorical exemption is an inadequate level of environmental review for this project. A Class 3 categorical exemption cannot be used to address impacts to an environmental resource of critical concern identified by a State resource agency. A Class 3 categorical exemption cannot be utilized where a project may impact on an environmental resource of critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies (in this case a State resource agency).

To sever ten acres of such State agency precisely mapped habitat without addressing the impacts in habitat block 39L and the biological connectivity it provides at this location is in direct conflict with the CEQA mandates.

The subject property is located within numbered habitat block 39L on the Conservancy's adopted *Griffith Park Area Habitat Linkage Planning Map*. This planning map is part of the Conservancy's *Eastern Santa Monica Mountains Natural Resource Protection Plan* adopted in December 2021. Habitat block 39L is fully contiguous with and part of the core habitat of Griffith Park. Maps are attached showing the subject project and the proposed development overlain on the boundary of habitat block 39L. Because of this high-quality connectivity to Griffith Park that includes additional MRCA lands, the full range of wildlife species in Griffith Park including mountain lion, mule deer, bobcat, and grey fox can use the full extent of the subject southern extension of habitat block 39L as a resource area, including as a refuge area from wildfires.

The subject lot is part of an uncommon north-facing slope habitat within this mapped habitat block that also includes several other MRCA-owned parcels. Upon consultation, the MRCA staff stated that they acquired property in this north-facing slope area because it supports many native trees and other resources limited to more mesic chaparral habitat. The most recent, successful forays of Griffith Park mountain lion P-22 deep into the streets of Silver Lake show both the capability and interest of local mountain

lions to frequently explore all edges of their territories. Any animal in Griffith Park can travel to the southern tip of habitat block 39L without having to cross a road.

The Santa Monica Mountain's evolutionarily significant mountain lion population is a State-listed candidate threatened species and currently receives all the protections of a listed threatened species. As part of a large contiguous core habitat area with high quality chaparral and woodland vegetation, the subject portion of habitat block 39L is without question mountain lion habitat and habitat for the species' principal prey mule deer. The proposed project would both eliminate mountain lion habitat and permanently degrade the ecological value of MRCA parkland via required annual fuel modification and via lighting impacts from the new habitable structure and accessory structure. The potential adverse impacts of this permanent new fuel modification area have not been analyzed. Because the project site has clear ecological value for a State candidate threatened species, a Class 32 Categorical Exemption cannot be utilized.

Peninsulas of high-quality connected habitat in the eastern Santa Monica Mountains (such as the southern extension of habitat block 39L) serve a vital role in providing refuges in an already challenged and ever shrinking habitat system that still supports sub-populations of numerous medium and large-bodied mammal species. Such outlying habitat refugia provide both every day ecological value to multiple species and critical escape areas in the event of wildfires. It is critical that a non-fenced, permanently protected, adequate width habitat linkage remain on the southwestern end of the subject private property; if not, approximately ten acres of habitat would be eliminated from the Griffith Park ecosystem for larger terrestrial animal access. To date this potential adverse habitat linkage impact has not been addressed or mitigated.

The precise tipping points of the Griffith Park ecosystem to no longer sustain healthy subpopulations of mountain lion, bobcat, grey fox, and mule deer is not definitively known, but to many ecologists it has all but been reached, and without question comes closer every year – even month - with both the increasing incremental reduction in soil moisture from global warming causing vegetation decline and ongoing additional residential development including ADUs.

Potential ecological impacts to the overall Griffith Park area ecosystem, on both an acre-by-acre and native tree-by-tree basis must be analyzed on a more amplified level because of the ecosystem's limited size and tenuous connection to the remainder of the mountain range west of the 101 freeway in the Cahuenga Pass. To adequately mitigate project impacts to this Griffith Park area ecological system, project impact analyses (of

Los Angeles City Council
CEQA Appeal 2669 N. Bronholly Drive – CF 22-0499
May 6, 2022
Page 6

all potential disturbance footprints) and permanent habitat protection mechanisms must be amplified or the ecological capacity of perhaps the most unique urban ecosystem in the world will undoubtedly soon suffer significant, irreversible declines in mammal species health and diversity.

To date there has been no analysis of potential ecological impacts of proposed trenching on MRCA parkland to connect to a City sewer line located on the MRCA property. Both this proposed trenching/sewer pipe connection and slope grading come within a few feet of a protected coast live oak tree on public land. This grading would be on two sides of the tree's canopy and would substantially change soil drainage patterns on both the side of and above the tree.

The actual proposed onsite grading would come within two feet of the protected oak tree's trunk according to the latest available civil plans. That close margin does not account for slough, remedial grading, or equipment maneuvering. A proposed cut slope flirts with the oak tree trunk and eliminates many cubic yards of earth upslope directly next to the tree thus totally altering the hillside drainage above and adjacent to the tree. The grading plans must be altered to better buffer the oak tree's support system and protect the structural and ecological integrity of the adjacent MRCA parkland. As it stands, much of the oak tree's root system would be severed or exposed.

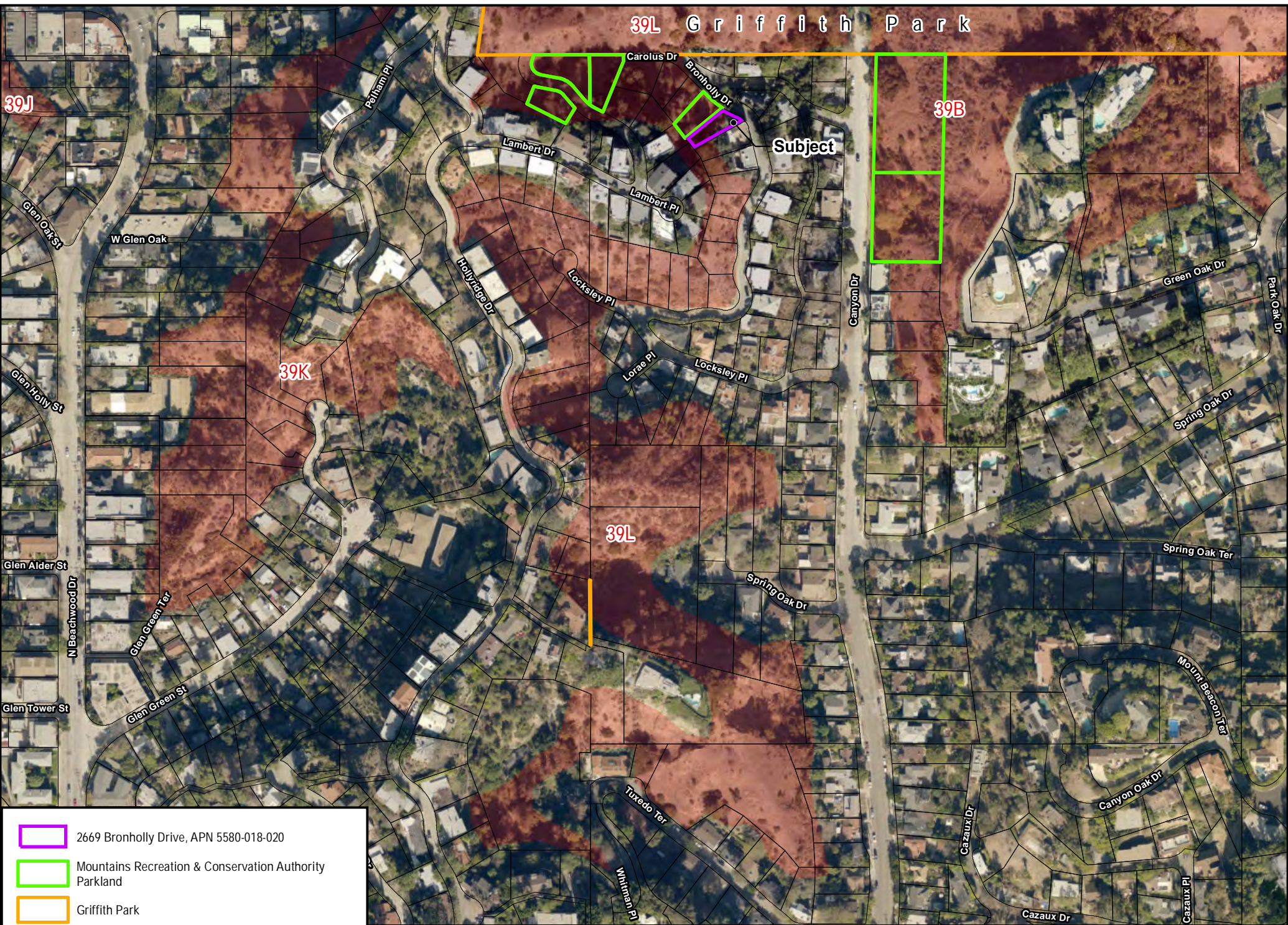
The Conservancy urges the City Council to fully support the CEQA appeal from the Bronholly & Carolus Residents Coalition and to deny adoption of the Categorical Exemption issued by the Bureau of Street Services.


I write this letter as a biologist with thirty-three years as an ecological professional in the eastern Santa Monica Mountains. Thank you for your consideration.


Sincerely,





PAUL EDELMAN
Deputy Director
Natural Resources and Planning

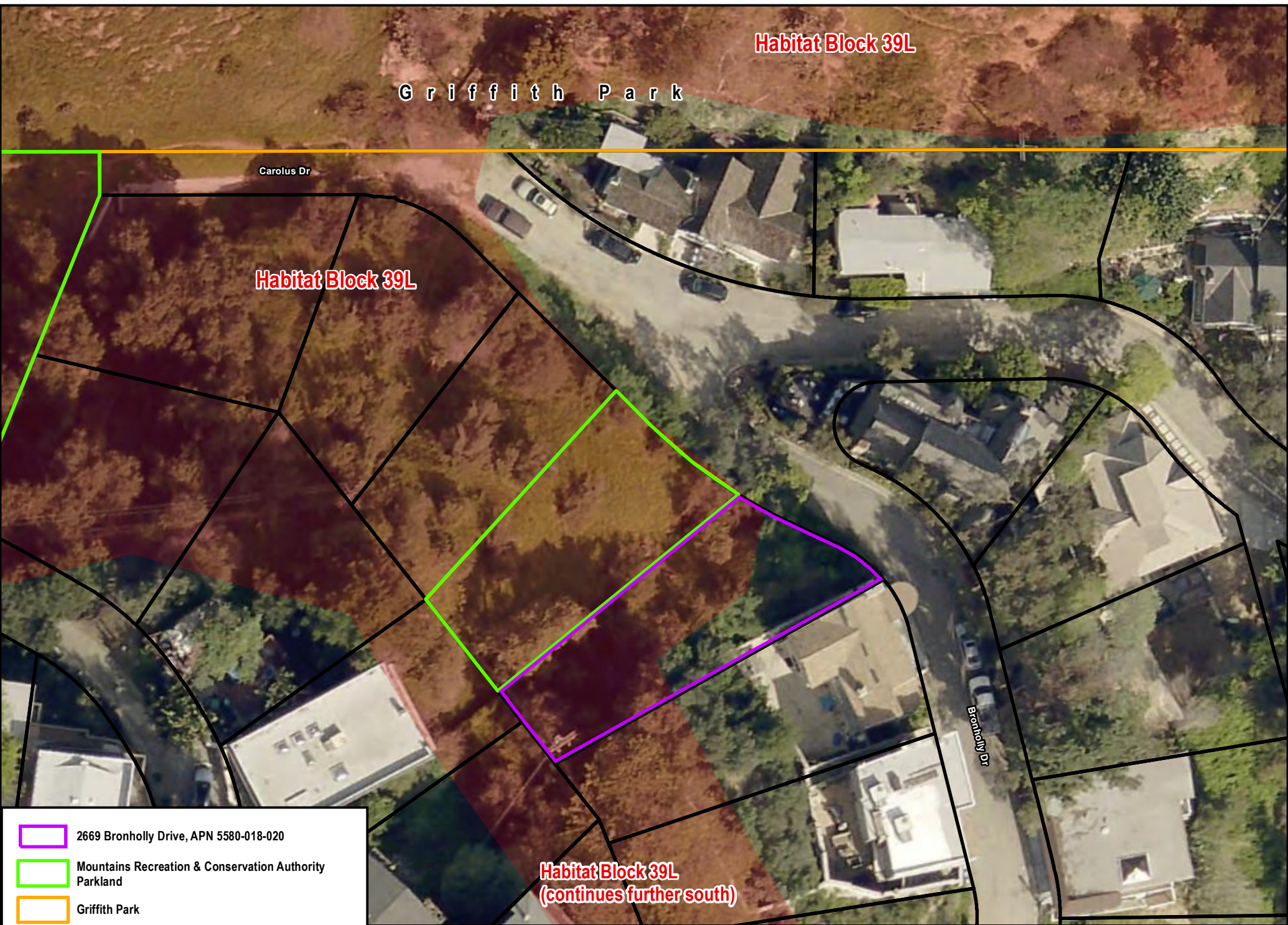



 2669 Bronholly Drive, APN 5580-018-020

 Mountains Recreation & Conservation Authority Parkland


 Griffith Park

 Habitat Blocks (per Griffith Park Area Habitat Linkage Planning Map, adopted by the Santa Monica Mountains Conservancy December, 2017)







2669 Bronholly Drive, APN 5580-018-020



Mountains Recreation & Conservation Authority Parkland



Griffith Park



Habitat Blocks (per Griffith Park Area Habitat Linkage Planning Map, adopted by the Santa Monica Mountains Conservancy December, 2017)

Habitat Block 39L
(continues further south)



2669 Bronholly Drive, APN 5580-018-020



Habitat Blocks (per Griffith Park Area Habitat Linkage Planning Map, adopted by the Santa Monica Mountains Conservancy December, 2017)



Mountains Recreation & Conservation Authority Parkland

39L

39L

39L

39L continues further south

2661 Bronholly Drive

2659 Bronholly Drive

Bronholly Dr

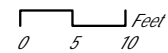


EXHIBIT 7

EXHIBIT 7

39L

39J

39K



EXHIBIT 8

EXHIBIT 8



2669 Bronholly Drive, APN 5580-018-020



Habitat Blocks (per Eastern Santa Monica Mountains
Habitat Linkage Planning Map, adopted by the Santa
Monica Mountains Conservancy April 19, 2021)



Mountains Recreation & Conservation Authority
Parkland

39L

39L

39L

39L continues further south

2661 Bronholly Drive

2659 Bronholly Drive

Bronholly Dr

0 5 10 Feet



EXHIBIT 9

EXHIBIT 9

Mountain Lion Home Ranges 2016

Santa Monica Mountains National Recreation Area

National Park Service
U.S. Department of the Interior

