

**SANTA MONICA MOUNTAINS CONSERVANCY**

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October 27, 2003

Maya E. Zaitzevsky  
City of Los Angeles Planning  
200 North Spring Street, Room 763  
Los Angeles, California 90012-4801

**Stephen S. Wise Middle School Relocation Project  
Notice of Preparation Comments**

Dear Ms. Zaitzevsky:

The Santa Monica Mountains Conservancy's concerns with the subject school relocation and expansion project revolve around maximizing the aesthetics of the Mulholland Scenic Parkway, the connectivity between habitat patches, and the net amount of open space acres in the area.

The proposed project involves major construction next to Mulholland Drive in two locations. Both of these proposed construction sites either abut or encompass the substantial sized habitat area between the existing High School and existing nursery school. This natural area provides both habitat and an irreplaceable wildlife movement corridor between the Mission Canyon area and a smaller network of habitat patches located north of Mulholland Drive. In addition this habitat patch provides the only direct connection for wildlife to access the Mulholland Drive bridge over the San Diego (405) Freeway. The Draft Environmental Impact Report must accurately map these movement corridors.

The preservation of these already severely compromised cross-Mulholland and cross-freeway wildlife movement corridors is critical to prevent the biological isolation of major sections of the eastern Santa Monica Mountains. A recent Masters Thesis (Roth, 2001), entitled, "Wildlife Corridors Across the 405 Freeway in the Sepulveda Pass, Los Angeles, California" from Cal State Northridge addresses the ecological importance of the subject site. The Draft Environmental Impact Report (DEIR) must integrated the findings of this study and report.

Because the section of the Institutional Corridor within the Mulholland Scenic Parkway Specific Plan is already grossly inconsistent with the Specific Plan guidelines and intent, any future projects must go the extra mile to be exemplary of those guidelines. To help the public and decision makers with understanding the area, the DEIR should include as many figures and maps as necessary to show the exact parcel boundaries of every property located

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in the aerial photograph labeled Figure A-3 in the distributed Environmental Assessment Form and Initial Study. These new figures must use the most up to date City of Los Angeles parcel data to be accurate. The figures should clearly label any property that is permanently protected by deed restriction, condition of approval, or public ownership. The figures should indicate the exact ownership of every non-residential parcel in the subject area.

The DEIR should clearly lay out any and all mitigation measures and conditions of approval in the certified EIR for the Stephen S. Wise High School project and the City's project approval, respectively, that addresses the protection, minimized disturbance, landscaping and fencing of areas without buildings. The current fencing of the northern portions of the existing High School is an unfortunate impediment to wildlife movement.

The DEIR must include an alternative that maximizes wildlife movement potential above the Sepulveda Tunnel both to the Mulholland Drive freeway overcrossing and to the open space network north of Mulholland Drive. To be permanently effective this alternative must require the dedication of conservation easements to at least two public agencies. Those conservation easements must include every portion of wildlife movement areas that the project applicant controls. That requirement should also apply to all the applicant's property that is not part of subject application. One of the reasons that the Conservancy did not request conditions on the prior High School approval is that the project left the now proposed Middle School site open for habitat and wildlife movement purposes. As proposed in the Figure a-5, the project appears to have an unmitigable adverse effect on the wildlife approach and reception area on the west side of the freeway overpass. An unfenced gap between the existing High School and proposed Middle School may be the only solution. This gap would have to be totally free of any light shine between mid-night and 5 AM and be a minimum of 75-feet-wide.

In general, the fee rights-of-way of Mulholland Drive have been consumed for private uses (some permitted, some unpermitted) along the length of the scenic parkway. The DEIR should clearly show what uses, disturbances and permanently required enhancements are proposed in the rights-of-way. The best public purpose for the rights-of-way is to leave them entirely open and planted with just native plants. In addition the Mulholland Drive Core Trail as required in the Specific Plan should be accommodated on both sides of Mulholland Drive on all portions of the street controlled by the applicant.

The proposed installation of a playing field with lighting in the public right-of-way is sub-optimal. The DEIR should include an alternative for this portion of the project that

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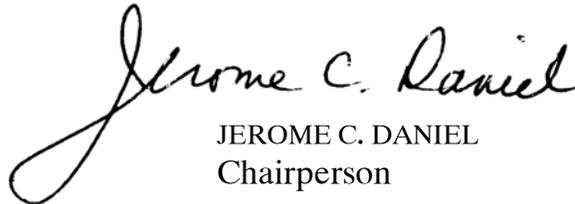
includes only irrigated native vegetation in the Mulholland right-of-way with no fencing, lighting or pavement.

In general, the DEIR must address how the proposed lighting of the project, and all relevant DEIR alternatives, could adversely effect wildlife usage of, and passage through, all abutting open space areas. Adequate mitigation of lighting impacts must include a diagram showing the extent of light shine, or illuminance, on all abutting patches of open space. The actual limits of such light shine/illuminance must be a documented mitigation condition in the FEIR to be enforceable and enduring.

To the Conservancy's knowledge, little if any open space has been dedicated in fee by any of the schools and facilities within the Institutional Corridor. A fee dedication of all land not currently landscaped or built on to a public agency would be a good gesture by the applicant. The Mountains Recreation and Conservation Authority would be an optimal recipient of any fee dedications and conservation easements.

Please direct any questions or future correspondence to Paul Edelman of our staff at (310) 589-3200 ext. 128 and at the above address.

Sincerely,

A handwritten signature in cursive script that reads "Jerome C. Daniel". The signature is written in black ink and is positioned to the left of the printed name and title.

JEROME C. DANIEL  
Chairperson