

SANTA MONICA MOUNTAINS CONSERVANCY

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Planning and Land Use Management Committee
City of Los Angeles
Room 395, City Hall
200 N. Spring Street
Los Angeles, California 90012

**Significant Biological Impacts Require Conservation Easements
on Tentative Tract No. 53884 - ENV-2003-2242-MND**

Dear Chairperson Reyes and Committee Members:

The ultimate land use on the 68 acres comprising Tentative Tract No. 53884 will, in great part, determine whether the 14-square mile Verdugo Mountains ecosystem will become a biological island. As proposed, the 14 equestrian estate lots would sever one of two remaining wildlife movement corridors that connect the Verdugo Mountains to the Big Tujunga Wash and Angeles National Forest. Severance of this inter-mountain range habitat linkage is a regionally significant biological impact. The loss of habitat in Shadow Hills is also a significant adverse impact.

The mitigation measures for biological impacts in the subject Mitigated Negative Declaration (MND) leave no chance for an ecologically functional wildlife corridor through Shadow Hills between Hansen Dam and the Verdugo Mountains (attachment listing all such measures to follow). The only mitigation measure that can guarantee such a wildlife movement corridor is a contiguous, permanently protected swath of open land across the length of the project. The MND for the project will remain deficient unless such mitigation is incorporated into the document.

The Conservancy hereby proposes such a mitigation measure in the form of a set of conservation easements across the northern and southern project boundaries. Wildlife corridors that are thousands of feet long require both adequate (variable) width and sufficient natural vegetative cover for native species. Target species for the subject corridor include mule deer, bobcat, mountain lion, California quail, grey fox, long-tailed weasel, California road runner, and cottontail rabbits. The proposed conservation easements would contain sufficient habitat quality and continuity to provide for the periodic movement of these species through Shadow Hills.

The extent of the approximately 36-acre conservation easement area is shown on the attached figure. These easements require zero changes to the proposed grading plan. All 14 estate lots will remain. The flat pad portions of five lots (a total of approximately 90,000-square-feet) will need to remain free of fencing and be limited to irrigated native plants to achieve adequate ecological function. All vegetation in the easements must be limited to indigenous plants. Irrigation is encouraged within 100 feet of habitable structures and on manufactured slopes, but would not be compatible in any other portions of the easements.

To provide adequate enforcement capability, the easements must be held by a public agency. We have consulted the Mountains Recreation and Conservation Authority (MRCA) and they would openly accept the subject easements. The same approach is being used on Parcel Map 013944 located in the same wildlife corridor approximately one half mile to the east. To be effective, the easements must prohibit all lighting, soil and vegetation disturbance, dumping, hardscape, structures, fencing, animal keeping or grazing, and planting of non-native plants. The proposed public equestrian trails through the project are a compatible use.

If the applicant is not willing to accept this additional mitigation measure as defined, we urge you to uphold the Conservancy's appeal and deny the project. If the applicant is willing to accept granting approximately 36 acres of conservation easement to the MRCA, we suggest the following course of action that was recently used by your Committee on Parcel Map 013944. In that case, the Conservancy's appeal was denied but a condition was added requiring the applicant to grant a conservation easement to the MRCA prior to, or simultaneously with, map recordation. We consent to such an action if: 1) the minimum easement size is 36 acres, 2) all of the above described use prohibitions are incorporated verbatim, 3) the boundaries of the easements closely approximate those shown on the attached graphic, 4) that the easement be granted at no cost to the MRCA, 5) that the boundaries of the conservation easement be defined by the proposed new lot numbers within the tract, and 6) that the minimum width of any portion of the easements never be less than 100 feet except at the eastern boundary of lot 13 where a brief narrowing to 80 feet is required by a road. The MRCA and the applicant would prepare a recordable easement(s) collaboratively.

The Santa Monica Mountains Conservancy is dedicated to maintaining an interlinking system of natural areas and trails in the Rim of the Valley Trail Corridor Zone. Since 1990, the City has only approved a couple of tract maps in the Conservancy's jurisdiction with less than a 50 percent fee simple open space dedication. In all cases a fee simple dedication to

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a public agency has been required. The proposed 52 percent conservation easement area interlaced with public trails is in total keeping with City's prior approvals. We urge your Committee and the full City Council to require the conservation easement mitigation measure requested in this letter. The subject 68-acre parcel has adequate room both for a functional wildlife corridor and 14 equestrian estates but only if adequately mitigated.

Please address any questions to Paul Edelman of our staff at the above address and by phone at (310) 589-3200 ext. 128.

Sincerely,

JEROME C. DANIEL
Chairperson