

**SANTA MONICA MOUNTAINS CONSERVANCY**

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December 6, 2004

Ms. Emily Gabel-Luddy  
City of Los Angeles Planning Department  
200 N. Spring Street, Room 763  
Los Angeles, California 90012

**Comments on ENV-2004-5928-MND, APCNV-2004-5927-ZC  
10010 Helen Avenue - Shadow Hills**

Dear Ms. Gabel-Luddy:

The Santa Monica Mountains Conservancy is making a concerted effort to permanently protect a critical mass of connected natural land in Shadow Hills. That critical mass must be adequate for both the movement, and short term habitation, of target species such as mule deer, bobcat, mountain lion, California quail, grey fox, long-tailed weasel, and greater roadrunner.

To achieve this level of ecosystem function, every remaining open space parcel in Shadow Hills with a semblance of connectivity to the remaining core habitat mass between Wentworth Avenue and Sunland Boulevard must contribute some land. That contribution must be an ecologically meaningful amount of permanent, natural open space that is greatly free of brush clearance requirements. If this level of ecosystem function is not achieved in the subject portion of Shadow Hills, the Verdugo Mountains would become a biological island. Such a fate would lead to the inevitable extinction of mule deer, bobcat, mountain lion, grey fox, and long-tailed weasel in the Verdugo Mountains. Likewise, Shadow Hills would become a mortality sink for wildlife.

The subject approximately 10-acre property is located at the southern end of the main Shadow Hills habitat block. This habitat block contains approximately 130 acres of contiguous natural land between Wentworth Avenue and Wheatland Avenue. The subject property supports high quality coastal sage scrub on the hillside in the northeast corner of the project area. This hillside area must be preserved to mitigate the incremental and cumulative loss of habitat in the Shadow Hills ecosystem. The attached map shows the approximately 2.4-acre hillside area with an intact coastal sage scrub community. The map also shows a recommended 75-foot-wide north-south wildlife movement corridor in the southeast corner of the project.

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The Mitigated Negative Declaration (MND) is deficient for not addressing in any detail the ecological resources on the subject property and how the proposed project would directly impact them and the greater Shadow Hills ecosystem. The MND is also deficient for not including adequate maps that show the boundaries of the subject property or the location of the proposed twelve lots and their associated grading footprints. The MND is further deficient for not including any meaningful, specifically worded, and enforceable mitigation measures to compensate for habitat loss.

The minimum adequate mitigation measure is a conservation easement over the entire 2.4-acre area shown on the attached map. That conservation easement area would provide habitat with sufficient natural vegetative cover and accessibility for mule deer, bobcat, mountain lion, California quail, grey fox, long-tailed weasel, greater roadrunner, and cottontail rabbits. It is the steepest portion of the property. The proposed conservation easement would contain sufficient habitat quality and continuity to contribute to the periodic movement of these species through Shadow Hills. However, for the easement to retain its long-term ecological function, fuel modification must be limited to a distance of twenty-five feet from the easement boundary. To ensure such protection, the project must be designed, and preclude future construction, such that no habitable structures be located within 75-100 feet of easement boundary. The distance would need to be determined with the fire department prior to map recordation. The exception to this brushing limitation should be the 75-foot-wide north-south wildlife corridor in the south-east project corner.

All vegetation in the easements must be limited to indigenous plants. Irrigation should be permissible in first twenty-five feet from the easement boundary. No grading or infrastructure of any type should be allowed at any time in any portion of the easement area.

To provide adequate enforcement capability, the easement 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. 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. Well planned equestrian trails through the easement would be a compatible use.

If the applicant will not accept this additional mitigation measure as defined, we urge the City to deny the project. If the applicant is willing to accept granting approximately 2.75-

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acre conservation easement to the MRCA, the cost free transfer of the easement should be a condition of map recordation or issuance of a building permit, whichever occurs sooner. The MRCA and the applicant would prepare a recordable easement 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 a public agency has been required. The proposed less than 25 percent conservation easement area is in total keeping with City's prior approvals. The subject 10-acre parcel has adequate room both for a functional wildlife corridor and 12 equestrian estates but only if adequately mitigated. It is difficult to provide more detailed comments because the proposed equestrian trails and open space area are not described in the MND. The final MND should include specific mitigation measures requiring public equestrian trails in specific locations shown on easy-to-read maps.

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

Sincerely,

JEROME C. DANIEL  
Chairperson