

SANTA MONICA MOUNTAINS CONSERVANCY

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Mr. Joey Vasquez
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**MND-084-06-PL; ENV-2005-9337; 2400 Allesandro Avenue, Semi-Tropical
Spiritualists' Tract**

Dear Mr. Vasquez:

The Santa Monica Mountains Conservancy offers the following comments regarding the City of Los Angeles Mitigated Negative Declaration (MND) for a 14-unit single-family home project proposed on 3.08 acres, located northwest of Elysian Park. The project site is within the Santa Monica Mountains Conservancy Zone established by statute in 1979 pursuant to Division 23 of the California Public Resources Code. PRC Section 33105 states in part:

. . . The zone shall also include Elysian Park and El Pueblo de Los Angeles State Historic Park and, for purposes of providing a recreational trail corridor, it shall also include hiking and equestrian trail connections and accessways between Griffith Park, Elysian Park, and El Pueblo de Los Angeles State Historic Park.

The proposed project area is a key connection to the Rim of the Valley Trail Corridor, first delineated in Section 33105.5 of the Public Resources Code.

A study, entitled "People to Parks," was conducted to evaluate recreational and open space needs in the Los Angeles River area. The study identified Semi-Tropical Spiritualists' Tract in Echo Park as desirable for enlarging Elysian Park to the northwest, to connect it to the former Red Car property northwest of the 2 Freeway.

Deficiencies of the MND

The MND is deficient for numerous reasons. The California Environmental Quality Act (CEQA) document should be revised and recirculated for public comment. This new CEQA document should address consistencies with the Santa Monica Mountains Comprehensive Plan and Rim of the Valley Trail Corridor Master Plan.

The MND does not discuss the significance of the oak and walnut woodlands on the site, nor their role in providing connectivity to other woodlands in the surrounding area. The People to Parks study identified the Semi-Tropical Spiritualists' Tract, and several surrounding properties, as supporting healthy coast live oak and southern California Black walnut woodland. The California Walnut Woodland plant community is a community of special concern as designated by the California Department of Fish and Game. The MND states that of the six oaks onsite, one is to be removed, and that 35 non-oaks are to be removed. The revised CEQA document should enumerate how many of which tree species are proposed to be removed. Impacts to oaks and walnuts should be avoided to the maximum extent. A one to one replacement ratio is not adequate for the loss of walnut trees.

The MND is deficient for not providing a discussion of the wildlife utilizing the site, such as small mammals and birds, including raptors (birds of prey). The MND also does not address habitat or trail connectivity between the City's Elysian Park and former Pacific Red Car right-of-way, via the undercrossing under the Glendale Freeway. In addition, the MND does not address impacts to habitats associated with required fuel modification.

Project and retaining wall s may have viewshed implications from the 5 and 2 Freeways, and from adjoining areas. The MND does not address these potentially significant adverse environmental impacts.

Need for Project Modifications

It appears the project would result in mass grading of a natural site. The project, including driveways and roads, would impact nearly the entire site. The Conservancy recommends that the project be modified to avoid a substantial portion of the site to allow the preservation of an open space and recreational linkage. The areas to be avoided should include the most biologically sensitive areas with the greatest potential to connect to adjacent natural habitats. Grading should be minimized.

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A requirement for the dedication of an open space easement over a substantial portion of the property should be included in the mitigation measures in the CEQA document and in the conditions of the approval. A trail easement dedication should also be required. The Conservancy or Mountains Recreation and Conservation Authority would be appropriate entities to accept these easements.

In summary, the MND is deficient for not including the above-described analyses. A revised CEQA document should be prepared that incorporates these comments, and it should be circulated for review by the public. If substantial avoidance of direct impacts to the site are proposed, and if a trail easement and open space easement are required, then a revised MND would be sufficient. Otherwise, a Draft Environmental Impact Report (DEIR) should be prepared. This DEIR should include a robust analysis of project alternatives.

Thank you for your serious consideration of these comments. If you have any questions, or would like to discuss further, please contact Judi Tamasi of our staff at (310) 589-3200, ext. 128.

Sincerely,

ELIZABETH CHEADLE
Chairperson