

**SANTA MONICA MOUNTAINS CONSERVANCY**

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December 20, 2022

Mulholland Design Review Board  
c/o Katie Knudson  
Department of City Planning  
City of Los Angeles  
6262 Van Nuys Boulevard, Suite 430  
Van Nuys, California 91401

**ENV-2022-4003-EAF, ZA-2022-4002-DRB-SPP-F-HCA, 2401 Laurel Canyon Boulevard**

Dear Design Review Board Members:

Wildlife populations are a significant public resource within the Mulholland Specific Plan area. The subject northwest corner of Laurel Canyon Boulevard and Lookout Mountain Avenue is without question a critical habitat linkage hub that is clearly depicted on the Conservancy's *Eastern Santa Monica Mountains Habitat Linkage Planning Map* that was recognized by a City Council resolution this month. That regional connectivity importance is accentuated because the subject property is integral to the only moderate quality location for wildlife to cross Laurel Canyon Boulevard (LCB) for its full run through the Santa Monica Mountains. Other Conservancy-mapped LCB crossings feature severe topographical and/or more restrictive development constraints. Please see the attached habitat linkage figures.

For any City consideration of entitlements on the subject property, it is imperative to the continued function of the eastern Santa Monica Mountains east-west habitat linkage system, that significant portions of the property be permanently protected to enable adequate wildlife movement, in perpetuity. Private properties are part of this Public Commons that enabled mountain lion P-22 to reach Griffith Park and currently allow another lion to frequent Laurel Canyon. Only with permanent protections on private properties will this Commons continue to support key mammals such as grey fox, bobcat, mule deer, and mountain lion.

The applicant is requesting several discretionary approvals from the City to construct a home that is out of scale for the immediate neighborhood and chokes off access to one of the most productive perennial springs in the mountain range east of the 405 freeway. It is wholly against the public interest to grant any discretionary permits for this project without simultaneously securing permanent protections for portions of the property. Those permanent protections must provide sufficient (both spatial and quality) large

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mammal access to the onsite perennial water and adequate wildlife movement potential through the property as shown on attached figures. Shucking these responsibilities to the upstream property is irresponsible without further analysis and legal cooperation from that property owner. The attached figures show what land needs to be permanently protected onsite.

The obfuscation of the applicant-funded Biological Report on habitat connectivity, perennial water sources, and walnut woodlands, plus the absence of any CEQA review, leaves your Board with inadequate information about the proposed project relative to biological issues and other public resources such as perennial water sources. The Conservancy urges your Board to continue the subject hearing until City Planning provides a CEQA review, which is required by City code prior to your consideration. With this project, too much is at stake with the whole of the eastern Santa Monica Mountains to do anything less.

Under all scenarios, the Conservancy urges your Board to step up to protect the Commons that has been so well brought to light by the life and plight of P-22. With a property this critical to the greater natural system, it is imperative that all arms of the City government use all available tools to maximize protection of the Commons. This protection can easily occur on this property and accommodate a large house with garden areas and serious security fencing. But it requires both a further shift of the house footprint away from the water course that flows through the southernmost portion of the property and the recordation of permanent land protection instrument(s) over both the water course zone and around the back of the property connecting with sufficient width to contact Laurel Canyon Boulevard in two locations (see attached).

We hope that your Board will at a minimum make the following project recommendations:

1. Exclude all grading and any new improvements (including lighting) in the Conservancy-designed permanent protection area show on the attached figure.
2. Eliminate the second proposed driveway to Lookout Mountain Avenue.
3. Removal all existing private improvements (wall and fencing) from all Laurel Canyon Boulevard public rights-of-ways.
4. Eliminate all proposed new improvements (except minimum allowed driveway width) within Laurel Canyon Boulevard public rights-of-ways – including no lighting.

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The Conservancy is a California Environmental Quality Act (CEQA) Trustee Agency for projects potentially affecting natural resources in the precisely-mapped Santa Monica Mountains Zone. The applicant's biological report mentions the Conservancy's *Eastern Santa Monica Mountains Natural Resources Protection Plan* (NRPP), but fails to mention its component part the *Eastern Santa Monica Mountains Habitat Linkage Planning Map* that shows the subject property within Habitat Block No. 51. Habitat block 51 has multiple mapped habitat linkages connected to it. Our recent examination of the area has revealed additional habitat connections to and from the property. The applicant's biological report fails to include any of this critical information. Unfortunately, it too concludes that the property has no sensitive walnut woodland when two pictures in the report show walnut woodland within the property.

The immediate take away for your board is that the siting of the house, and its infrastructure, has not adequately addressed critical biological constraints on the property that can easily be avoided while still providing for a large house with garden spaces and lot-line-internal security fencing, even if not quite the full 10,000 square feet of home applied for. A large lot (or cluster of parcels) not cannot justify a poorly sited house that would have irreversible significant adverse biological and visual impacts. Furthermore, as proposed the project incorporates over 5,000 square feet of highly usable public right-of-way behind a private wall. That 5,000 square feet for level space has long been envisioned as community gathering or art display area by a Metro bus stop. The current unpermitted wall in that public ROW blocks both public roadway and bus stop views and blocks wildlife movement. The project also proposes a redundant driveway to Lookout Mountain Avenue across the tail end of a rare perennial water source.

In short, the project does not yet fit with the land, and we hope your Board can ultimately shape it to fit the land and provide adequate benefit to the Commons – that being the eastern Santa Monica Mountains ecosystem. The four above enumerated project design recommendations would achieve those public goals.

Sincerely,

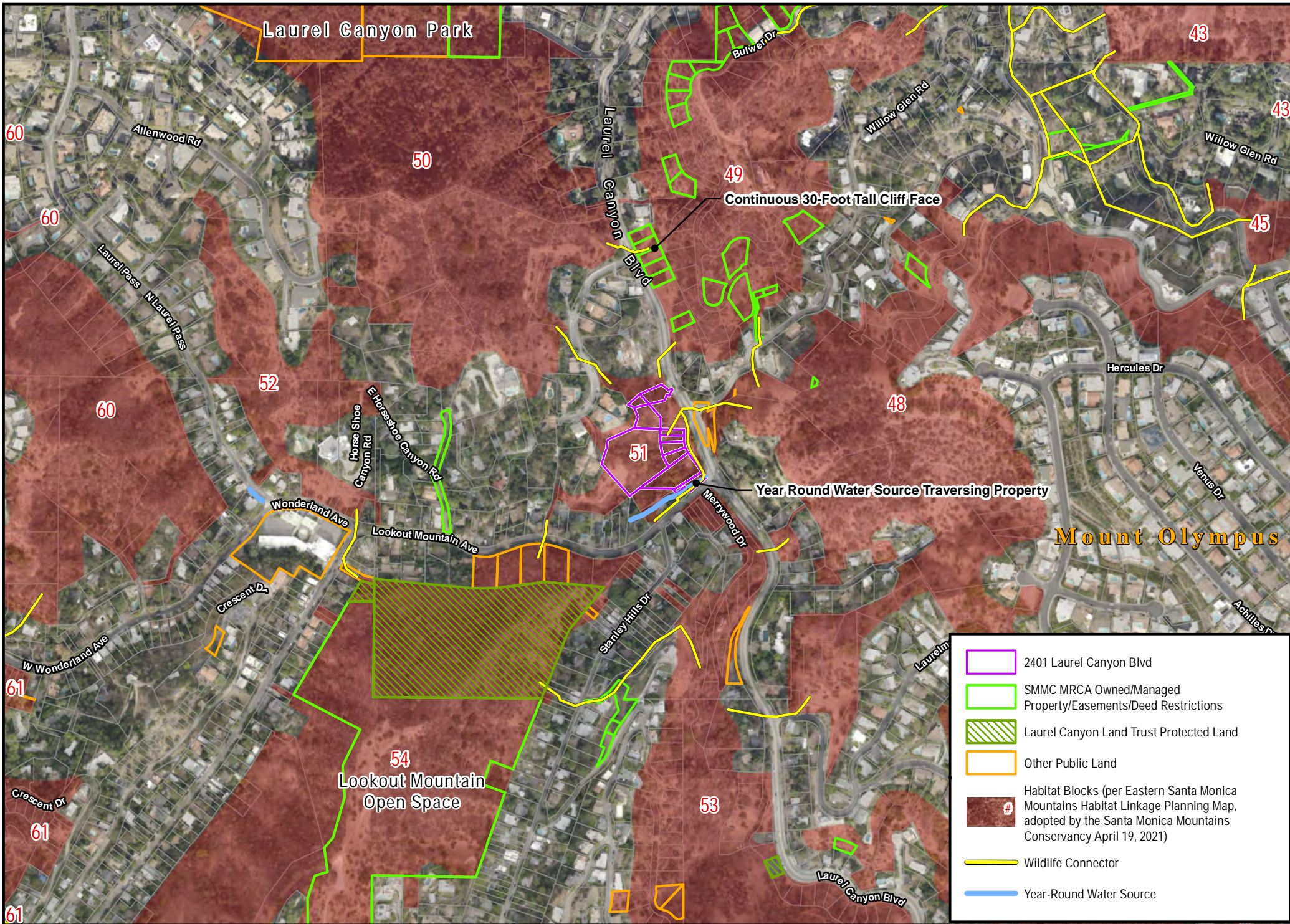
A handwritten signature in black ink, appearing to read "Paul Edelman", with a long horizontal flourish extending to the right.

PAUL EDELMAN

Deputy Director

Natural Resources and Planning



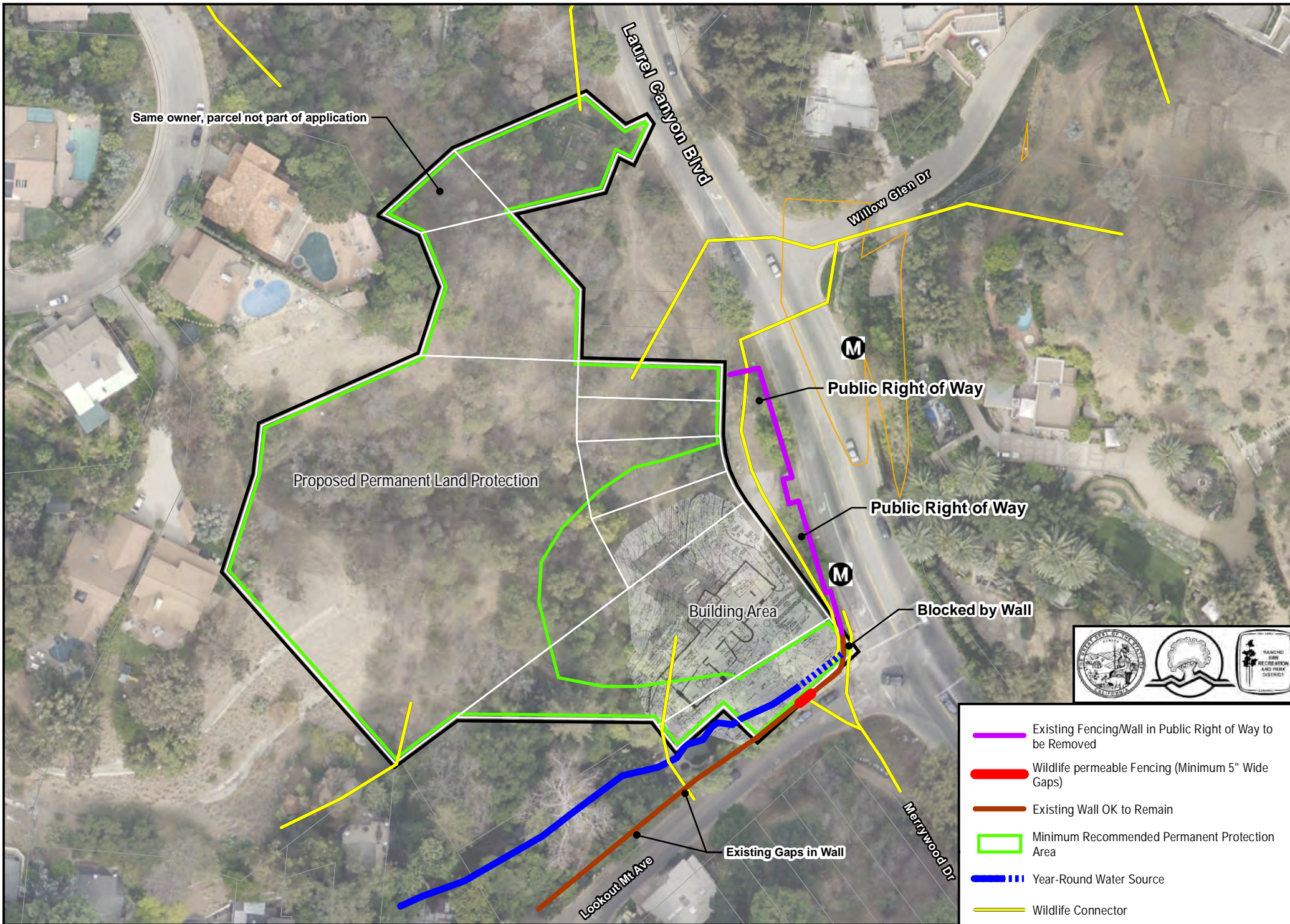


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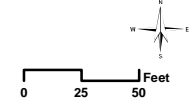
APNs associated with project:  
 5565-015-001, 5565-015-003, 5565-015-004, 5565-015-005, 5565-015-006, 5565-015-013, 5565-015-014, 5565-015-016, 5565-015-017







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- 2401 Laurel Canyon Blvd
- Other Public Land
- Year-Round Water Source
- Fencing (proposed, existing)
- Portion of Public Land Blocked by Proposed Fencing (approx. 5,135 sq ft)

