

DECLARATION OF BETTY DONG

I, Betty Dong, declare as follows:

1. I am employed by the City of Los Angeles (“City”). The facts stated herein are personally known to me, and if called as a witness I would competently testify to them.

2. I serve as the Geographic Information Systems (“GIS”) Chief for the City of Los Angeles (“City”) Department of City Planning. I have worked for the City for 27 years in different GIS positions including prior work for the Planning Department, Department of Sanitation, and the Los Angeles World Airport. I also have a Bachelor of Arts degree from the University of California, Los Angeles. As GIS Chief for the Planning Department I supervise 23 GIS Staff, comprising of GIS Specialists and GIS Supervisors I and II. We manage the GIS database for the Planning Departments adopted ordinances, zone amendments, general plan land use, community plans, specific plans, overlays, Transit Oriented Communities and other pertinent GIS data. This data is reflected monthly in the Planning Department’s web site called ZIMAS. In addition, we do product requests for the Planning Department, Mayor and Council and other departments like the Department of Cannabis Regulation, performing map analysis, creating web and map services and creating maps. My work with GIS systems involves computer generated graphical mapping of property and land data, particularly within the City. My training and work enables me to know the accuracy and reliability of GIS systems the City relies upon when making land and property determinations.

3. Attached hereto at Exhibit A are print-outs of a map I created titled, 2239 Laurel Canyon Blvd. (“2239 Map”). Exhibit A, Page 1 shows the 2239 Map printed at 1:591 scale. Exhibit A, Page 2 shows the 2239 Map printed at 1:1221 scale.

4. I began creating the 2239 Map utilizing ArcMap desktop 10.4 software which I regularly utilize to map property within the City as part of my job. I began by bringing in the Bureau of Engineering (BOE) parcel layer called Landbase_ply from our SDE server and symbolized this as a clear polygon with a red outline. I also brought in the BOE Anno_HN_GDB layer, that has all the house addresses as a label from our SDE server. I then used the LA Locator Tool (a customized add-in) to search for the address 2239 Laurel Canyon

Blvd. I then selected the parcel for 2239 Laurel Canyon Blvd from the landbase layer, and exported the single parcel as its own shapefile to my local drive. I displayed this as a clear polygon with a bold cyan border. I also brought in the BOE centerline layer as a black line and turned on the label for the Street name and street suffix. At this point, the 2239 Map depicted the property located at 2239 Laurel Canyon Boulevard.

5. I have reviewed the June 18, 2018 Declaration of Bonnie Thorne (“Thorne Declaration”), Exhibit A to which contains a California Public Records Act request sent to the Santa Monica Mountains Conservancy (“SMMC”). Exhibit D to the Thorne Declaration is a May 24, 2018 e-mail from SMMC Staff Counsel Spencer Eldred attaching two ESSM Data shapefiles. Attached to my declaration at Exhibit B is a true and correct copy of the same e-mail attached as Exhibit D to the Thorne Declaration forwarded to me by Bonnie Thorne on June 18, 2018. I have accessed the ESSM Data files shown at Exhibit B to my declaration and utilized those data files to continue creating the 2239 Map as described next in Paragraph 6.

6. After creating the 2239 Map to the point described above at Paragraphs 3 and 4, I then brought in the two shapefiles provided by the SMMC described at Paragraph 5, called ESSM_Wildlife_Corridors.shp (line layer) and ESSM_Habitat_Blocks.shp (polygon). I displayed the Polygon layer as a blue polygon with a 50% transparency and the line layer as a thick aqua green line on the 2239 Map. For the background of the 2239 Map, I brought in the 2014 LARIAC ortho imagery. I did check against the 2017 ortho imagery from the on-line service, and found that the subject area has not changed since the 2014 imagery.

7. The inset map shown at both pages of Exhibit A, the 2239 Map printouts, shows the entire extent of the ESSM_Wildlife Corridors and the ESSM_Habitat_Blocks layers, with a call out as to the 2239 Laurel Canyon extent.

8. I added the neatline, scalebar, north arrow and legend shown on the 2239 Map printouts.

9. The 2239 Map printouts at Exhibit A, pages 1 and 2, depicts where the property at 2239 Laurel Canyon Boulevard falls in relation to the SMMC ESSM_Wildlife Corridors and ESSM_Habitat_Blocks created by the SMMC to the best of my ability utilizing the data files

provided by the SMMC as shown in the Thorne Declaration, Exhibit D. I caused the Exhibit A, page 2 version of the 2239 Map to be created in order to show the SMMC wildlife corridor drawn nearest to the property at 2239 Laurel Canyon Boulevard as indicated by the data files provided by the SMMC, which appears to be 582 feet from the property based on the 2239 Map's scale.

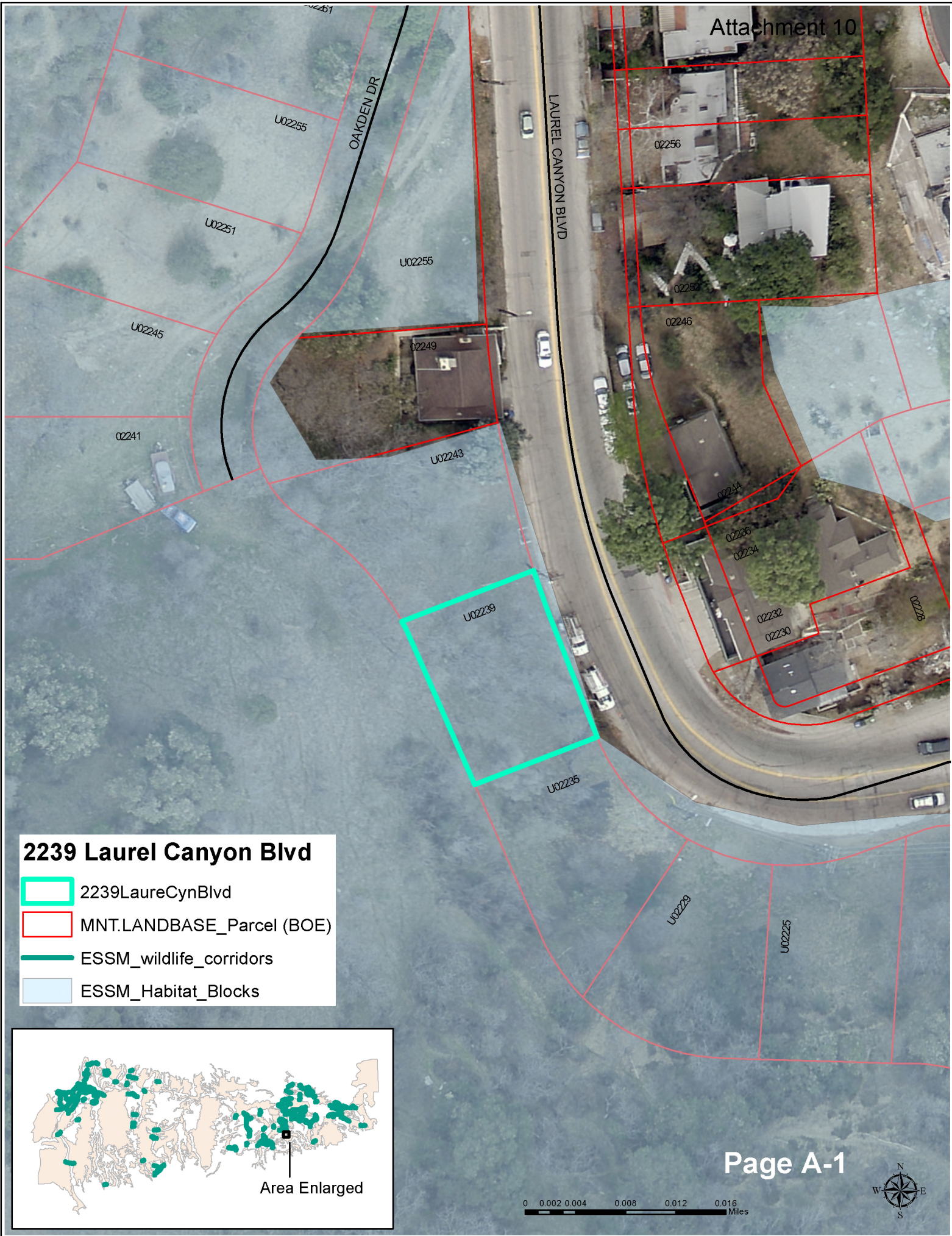
10. I declare under penalty of perjury under the laws of the state of California that the foregoing is true and correct. Executed this 19 day of June, 2018, at Los Angeles, California



Betty Dong

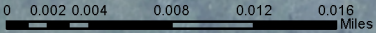
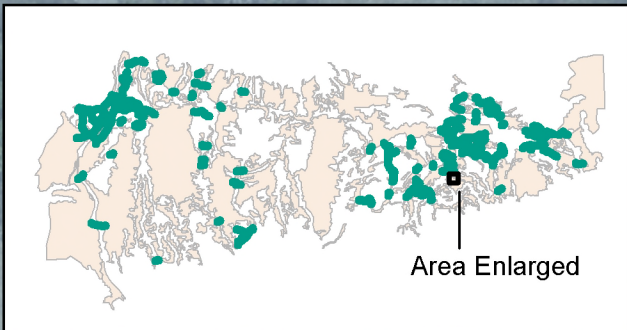
Exhibit A

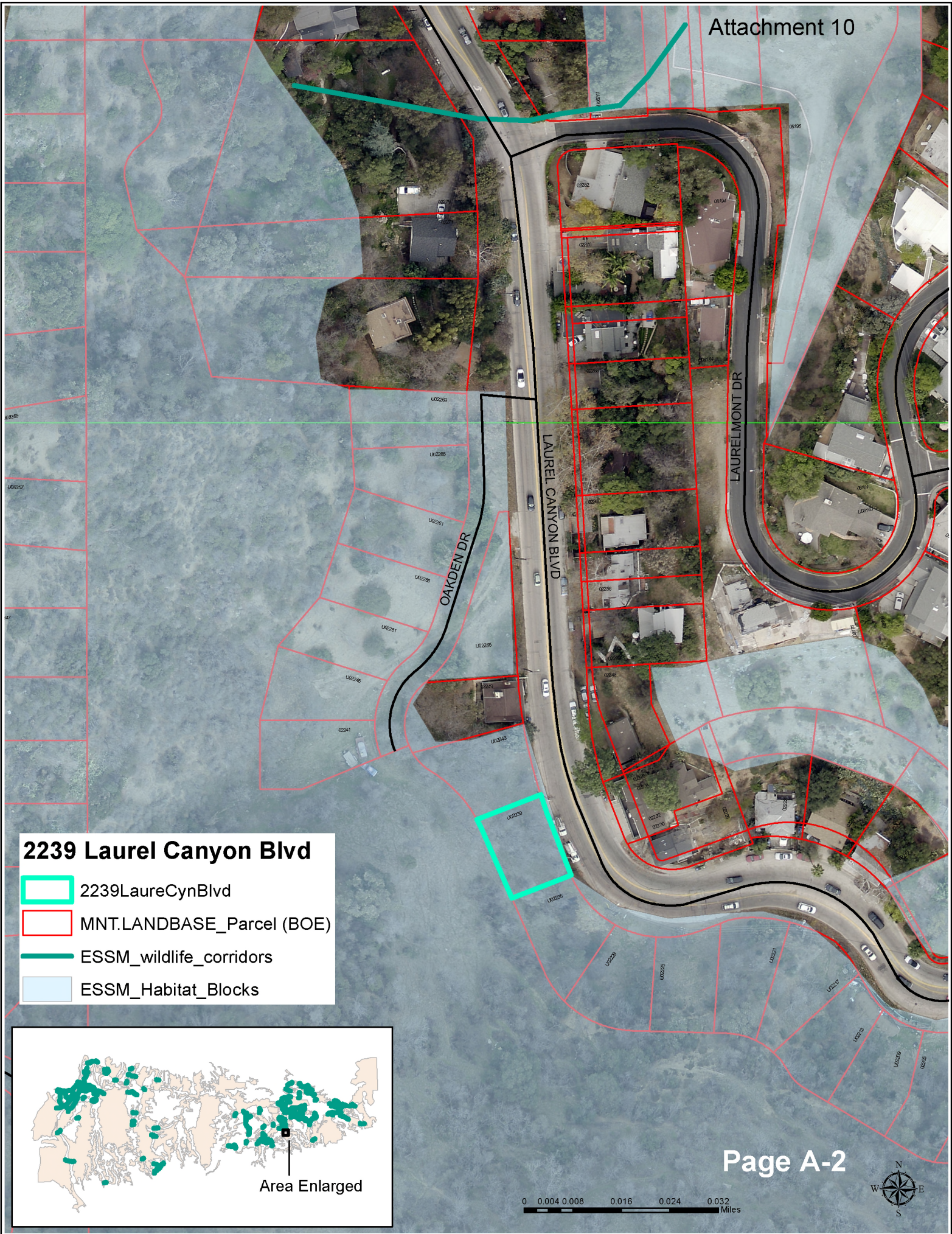
Exhibit A



2239 Laurel Canyon Blvd

-  2239LaureCynBlvd
-  MNT.LANDBASE_Parcel (BOE)
-  ESSM_wildlife_corridors
-  ESSM_Habitat_Blocks





2239 Laurel Canyon Blvd

-  2239LaureCynBlvd
-  MNT.LANDBASE_Parcel (BOE)
-  ESSM_wildlife_corridors
-  ESSM_Habitat_Blocks

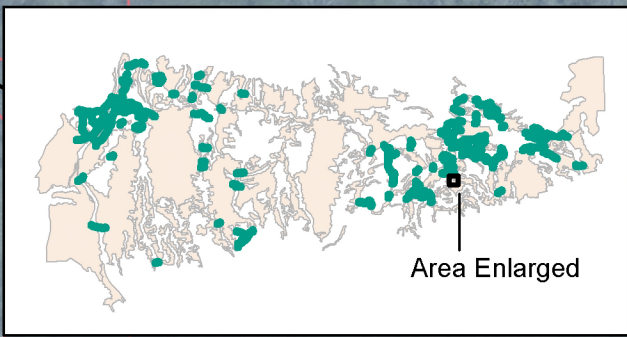


Exhibit B

Exhibit B



Betty Dong <betty.dong@lacity.org>

FW: ESSM

Bonnie Thorne <BThorne@rmmenvirolaw.com>
To: "betty.dong@lacity.org" <betty.dong@lacity.org>

Mon, Jun 18, 2018 at 11:15 AM

Betty,

The ESSM files received from the Santa Monica Mountains Conservancy are attached.

Best,

Bonnie Thorne

Paralegal/Legal Assistant

REMY MOOSE MANLEY, LLP

From: Spencer Eldred [mailto:spencer.eldred@mrca.ca.gov]
Sent: Thursday, May 24, 2018 11:06 AM
To: Bonnie Thorne <BThorne@rmmenvirolaw.com>
Cc: Andee Leisy <ALeisy@rmmenvirolaw.com>
Subject: ESSM

Good morning,

Attached is the spatial data in shapefile format that was used for our adopted January 2017 ESSM map. Our staff believe you will likely need ESRI software to use.

Warm regards,

Spencer Eldred

*Spencer Eldred, Staff Counsel**Mountains Recreation and Conservation Authority**570 West Avenue 26, Suite 100**Los Angeles, CA 90065**(323) 221-9944, ext. 181*

2 attachments



ESSM_Habitat_Blocks.zip
325K



ESSM_wildlife_corridors.zip
26K