

**SANTA MONICA MOUNTAINS CONSERVANCY**

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March 3, 2020

Hon. Marqueece Harris-Dawson, Chair  
Planning and Land Use Committee  
Los Angeles City Council  
200 N. Spring Street, Room 340  
Los Angeles, California 90012

**Council File 20-0027**  
**Las Pulgas Canyon**

Hon. Chair Harris-Dawson and Members of the PLUM Committee:

The Santa Monica Mountains Conservancy supports granting of the appeal for Council File 20-0027. The Conservancy is the principal State planning agency for the subject area.

The subject project site includes “desirable open space” according to the Brentwood-Pacific Palisades Community Plan that should be preserved and maintained as a public, natural open space because of its rarity and its recreational and educational value. The proposed project does not make an incremental contribution to protecting any of this open space. The environmental documentation to date fails to address the site’s spatial and resource contribution to either the Las Pulgas Canyon habitat block or connected habitat blocks to the east. The impacts of the proposed development cannot be analyzed or mitigated within the parameters of a Categorical Exemption.

Las Pulgas Canyon is a significant sized habitat block that is well connected to the habitat block on the west side of Temescal Canyon Road. That collective habitat block – via an at-grade, early morning wildlife crossing of the road -- connects to another significant sized habitat block on the east side of Temescal Canyon Road. That habitat block is well connected to Potrero Canyon open space. Thus the proposed project site currently contributes to, and benefits from, a larger habitat block located less than half a mile from the southern Terminus of Temescal Canyon Creek which is part of the great Topanga State Park ecosystem. Permanent direct and indirect impacts of the proposed project would extend beyond the footprints of the proposed houses with pools, decks and lighting that abut the habitat. Light spill, fire department mandated brush clearance, and domestic cat predation would extend beyond the proposed project legal

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boundaries. Zero habitat resources would remain on the proposed development site. The Conservancy urges support of the appeal so that additional environmental analysis can occur to protect the public trust resource of the Las Pulgas Canyon habitat block.

I can be reached at [edelman@smmc.ca.gov](mailto:edelman@smmc.ca.gov) for any questions or communications.

Sincerely,

A handwritten signature in blue ink, appearing to read "Paul Edelman", written over a faint circular stamp.

PAUL EDELMAN  
Deputy Director  
Natural Resources and Planning