V. ENVIRONMENTAL IMPACT ANALYSIS
D. BIOLOGICAL RESOURCES

INTRODUCTION

This section of the Draft Environmental Impact Report (DEIR) provides a description of the biological resources on the proposed project site, information on regulations that serve to protect sensitive resources, an assessment of the potential impacts of the proposed project, and recommended measures to mitigate potentially significant impacts on sensitive resources. Various technical reports were reviewed and prepared to analyze the potential biological resources impacts associated with the Project. These technical reports are summarized below and are included in the Appendix G of this Draft EIR.

BACKGROUND AND METHODS

An assessment of biological resources within the proposed project site was conducted by a consulting project biologist, TeraCor, in order to complete a *General Biological Assessment Report* for the project site (see Appendix G-1). This biological assessment involved a field survey of the project site to observe habitat types and conditions present on-site, as well as a review of existing biological information for the project site and pertinent scientific literature, consisting of the following:

- The California Natural Diversity Database (CNDDB) and other well-known publications documenting historical records of species occurrences in the project area vicinity;
- The USGS quadrangle map for the Canoga Park quadrangle;
- A color aerial photograph of the site taken in 2004;
- The *Geologic and Soils Engineering Exploration* report prepared by The J. Byer Group, Inc. (March 22, 2005); and
- The *Horticultural Tree Report Proposed Residential 22255 Mulholland Drive, Los Angeles, California (Project No. 504-1c-06)* prepared by Trees, etc. (August 8, 2006).

The *General Biological Assessment Report* prepared by TeraCor provides general information on the potential presence of sensitive species and habitats. The biological assessment is not an official protocol-level survey for listed species. The biological assessment was based on information available at the time of the study and on conditions that were observed on-site during reconnaissance surveys. The methods of study employed by TeraCor during the biological assessment of the Project site are outlined below.

Vegetation Communities

Literature reviewed in determining community names and vegetation associations and descriptions for the project area included: *The Jepson Manual: Higher Plants of California*[1], *Preliminary Descriptions of the Terrestrial Natural Communities of California*[2], and *A Manual of California Vegetation*[3]. Vegetation communities were field-mapped during the site reconnaissance surveys conducted on January 21 and February 12, 2006 by TeraCor. When plant community conditions on the ground were too mixed or too small to be mapped, these areas were classified by combining community types on the vegetation map.

Special Status Species

Literature Review

Potential occurrence of special status species on the Project site was evaluated by first determining which special status species have potential to occur in the vicinity of the Project site through a literature and database search. The following sources were reviewed to determine which special status plant and wildlife species have been documented to occur in the vicinity of the Project site:

a) California Natural Diversity Database records (CNDDB) for the Canoga Park USGS quadrangle[4];

b) A Natural History of California[5];

c) The Mammals of North America[6];

d) Birds of Southern California, Status and Distribution[7];

e) California Birds: Their Status and Distribution[8];

f) Mammalian Species of Special Concern in California[9];

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[1] *Hickman, J.C., ed. 1993. The Jepson Manual: Higher Plants of California. U.C. Press, 1400 pages.*

[2] *Holland, R. F. 1986. Preliminary Descriptions of the Terrestrial Natural Communities of California. Prepared for the California Department of Fish and Game, Sacramento, California*

[3] *Sawyer, J.O. and T. Keeler-Wolf. 1995. A Manual of California Vegetation. California Native Plant Society, 471 pages.*

[4] *California Department of Fish and Game. 2006. Natural Diversity Database, Wildlife and Habitat Data Analysis Branch. Sacramento.*

[5] *Schoenherr, A.A.. 1992. A Natural History of California, University of California Press, Berkeley, CA, 772 pp.*

[6] *Hall, E.R. 1981. The Mammals of North America. John Wiley and Sons, N.Y., N.Y. (2 volumes), 1181 pages.*

[7] *Garrett, K. and J. Dunn. 1981. Birds of Southern California, Status and Distribution. Los Angeles Audubon Society, publication, 408 pages.*

[8] *Small, A. 1994. California Birds: Their Status and Distribution. Ibis Publ., 342 pages.*

g) Life on the Edge: A Guide to California's Endangered Natural Resources[10].

Species Assessment

Reconnaissance surveys were conducted on the site by TeraCor on January 21 and February 12, 2006. During the surveys, the project site's biological resources were assessed for both general biological resources and for specific support resources for several rare species with potential to occur on-site in the area. Plant and animals species observed were recorded, and an assessment of the vegetation and site conditions was made to predict the presence of special status species on-site. The evaluation for presence of sensitive organisms (e.g., considered rare or otherwise sensitive by the USFWS, CDFG or the California Native Plant Society) included such variables as availability of support resources (such as rock outcrops, flowing water, specific host plants, nesting sites, etc.), the size of the project site, and the history of disturbance. The likelihood of potential occurrences is further predicated on the known distributions of species, and their overall habitat requirements.

An "occurrence probability rating" has been designated for each species based on the above described factors. Species occurrence has been: 1) **Confirmed Present**, 2) determined **Not Present**, or 3) determined to be one of the following:

(1) **Low**. The subject project site is within the known range or distribution of the species. Suitable habitat on-site is marginal to non-existent. Site factors, such as disturbance or other human factors, likely preclude species occurrence. Focused investigation for the species is not warranted.

(2) **Moderately Low**. The survey site is within the historic range of the species. Site factors may be somewhat suitable but other conditions may exist (adjacent urbanization, isolation, etc.) to suggest a fairly low probability of occurrence. The species has not recently been detected within the vicinity, or site conditions are such that sustained presence is unlikely.

(3) **Moderate**. The species has a reasonable possibility of occurrence on-site. Habitats are generally suitable and the species is known to occur in the area.

(4) **Moderately High**. Habitats on the site are structurally suitable for the species and occurrence is recently confirmed in the vicinity of the site.

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[9] *Williams, D.F. 1986. Mammalian Species of Special Concern in California. California Department of Fish and Game, Wildlife Management Division Administrative Report, 86-1, 112 pages.*

[10] *Thelander, C.G., ed. 1994. Life on the Edge: A Guide to California's Endangered Natural Resources., Biosystems Books, 550 pages.*

(5) **High**. The site contains highly suitable habitat for the species and disturbances, if present, would likely affect occurrence. The organism has recently been detected either on-site or in the vicinity, or ecological conditions are such that qualified personnel can reasonably anticipate presence.

Table 1 of the TeraCor *General Biological Assessment Report* (see Appendix G-1) and included below as Table V.D-3, presents the special status plant and wildlife species with potential to occur on the Project site and their potential occurrence rating. Plant and animal species observed during the site surveys were recorded and are also included in Appendix G-1.

Sensitive Natural Communities and Jurisdictional Resources

Plant communities identified within the Project site were evaluated to determine if they are considered sensitive under federal or state regulations or policies. During the reconnaissance site surveys, observations were made and recorded regarding potentially jurisdictional wetlands or waters features, and vegetation growing along or near such features which may be considered riparian habitat. A formal delineation of wetlands and waters considered potentially jurisdictional by the Corps or CDFG was not conducted on-site.

REGULATORY FRAMEWORK

Federal

Federal Endangered Species Act

The Federal Endangered Species Act (FESA) defines an endangered species as "any species that is in danger of extinction throughout all or a significant portion of its range." Threatened species are defined as "any species which is likely to become an endangered species in the foreseeable future throughout all or significant portions of its range." The Sacramento, California United States Fish and Wildlife Service (USFWS) Field Office describes Federal Species of Concern (FSC) as "a sensitive species that has not been listed, proposed for listing, or placed in candidate status." The FSC receives no legal protection and use of the term does not necessarily mean the species will eventually be proposed for listing as a threatened or endangered species. The Federal listing status is as follows:

FE	Federally listed as Endangered
FT	Federally listed as Threatened
FPT	Federally Proposed as Threatened
FPE	Federally Proposed as Endangered
FPD	Federally Proposed for delisting
FC	Federal Candidate Species
FSC	Federal Species of Concern

Migratory Bird Treaty Act

The federal Migratory Bird Treaty Act (MBTA), first enacted in 1916, prohibits any person unless permitted by regulations, to:

> "pursue, hunt, take, capture, kill, attempt to take, capture or kill, possess, offer for sale, sell, offer to purchase, purchase, deliver for shipment, ship, cause to be shipped, deliver for transportation, transport, cause to be transported, carry, or cause to be carried by any means whatever, receive for shipment, transportation or carriage, or export, at any time, or in any manner, any migratory bird, included in the terms of this Convention . . . for the protection of migratory birds . . . or any part, nest, or egg of any such bird." (16 U.S.C. 703).

The list of migratory birds includes nearly all bird species native to the United States; non-native species such as European starlings are not included. The statute was extended in 1974 to include parts of birds, as well as eggs and nests. Thus, it is illegal under MBTA to directly kill, or destroy a nest of, nearly any bird species, not just endangered species. Activities that result in removal or destruction of an active nest (a nest with eggs or young being attended by one or more adults) would violate the MBTA. Removal of unoccupied nests, or bird mortality resulting indirectly from a project, is not a violation of the MBTA. Any activity, such as grading or grubbing for construction of the project site, that results in destruction of one or more active nests of native birds would entail a violation of the MBTA.

Clean Water Act

The U.S. Army Corps of Engineers (Corps) regulates "Waters of the United States" under Section 404 of the Clean Water Act (CWA). "Waters of the U.S." are defined broadly as waters susceptible to use in commerce, including interstate waters and wetlands, all other waters (e.g., intrastate waterbodies, including wetlands), and their tributaries (33 CFR 328.3). Potential wetland areas, according to the three criteria used to delineate wetlands stated in the Corps of Engineers Wetlands Delineation Manual (1987), are identified by the presence of (1) hydrophytic vegetation, (2) hydric soils, and (3) wetland hydrology. Areas that are inundated for sufficient duration and depth to exclude growth of hydrophytic vegetation are subject to Section 404 jurisdiction as "other waters" and are often characterized by an ordinary high water line (OHW). Other waters, for example, generally include lakes, rivers, and streams. The placement of fill material into "Waters of the U.S.", including wetlands, generally requires an individual or Nation Wide Permit (NWP) from the Corps under Section 404 of the CWA. The State also regulates "waters of the state" under Section 401 of the Clean Water Act – see discussion of "State" regulations below.

State

California Endangered Species Act

The California Environmental Species Act (CESA) defines an endangered species as "a native species or subspecies of a bird, mammal, fish, amphibian, reptile, or plant which is in serious danger of becoming extinct throughout all, or a significant portion, of its range due to one or more causes, including loss of habitat, change in habitat, overexploitation, predation, competition, or disease." The State defines a threatened species as "a native species or subspecies of a bird, mammal, fish, amphibian, reptile, or plant that, although not presently threatened with extinction, is likely to become an endangered species in the foreseeable future in the absence of the special protection and management efforts. Any animal determined by the commission as rare on or before January 1, 1985 is a threatened species." Candidate species are defined as "a native species or subspecies of a bird, mammal, fish, amphibian, reptile, or plant that the commission has formally noticed as being under review by the department for addition to either the list of endangered species or the list of threatened species, or a species for which the commission has published a notice of proposed regulation to add the species to either list." Candidate species may be afforded temporary protection as though they were already listed as threatened or endangered at the discretion of the Fish and Game Commission. Unlike FESA, CESA does not include listing provisions for invertebrate species. The State listing status is as follows:

SE	State listed as Endangered
ST	State listed as Threatened
SR	State listed as Rare (Plants only)
CSC	California Species of Special Concern
SFP	Fully Protected
SCE	State Candidate for Endangered
SCT	State Candidate for Threatened
Special Animal	CNDDB Special Animal

"Special Animal" is a general term that refers to all of the taxa the CNDDB is interested in tracking, regardless of their legal protection status.

California Fish and Game Code 3503

California Fish and Game Code 3503, 3503.5, and 3512 prohibit take of birds and active nests. Any activity, such as grading or grubbing for construction of the project site, that results in destruction of one or more active nests of native birds would entail a violation of the Fish and Game Code. Construction activities that result in abandonment of an active bird nest in areas adjacent to the disturbance may also violate sections of the Fish and Game Code.

California Environmental Quality Act

Plant species which may not be listed as endangered, threatened, candidate, or proposed species under FESA or CESA, but are still considered rare, are generally assigned a rarity code by the California Native

Plant Society (CNPS). The CNPS is a private plant conservation organization dedicated to the monitoring and protection of sensitive species in California. CNPS has compiled an inventory comprised of the information focusing on the geographic distribution and qualitative characterization of Rare, Threatened, or Endangered vascular plant species of California. The list serves as the candidate list for listing as Threatened and Endangered by the California Department of Fish and Game (CDFG). The CNPS five categories of rarity are summarized in Table V.D-1 (Summary of CNPS Lists 1, 2, 3, and 4). Under CEQA, impacts analyses are mandatory for List 1 and 2 species, but not for all List 3 and 4 species as some do not meet the definitions of the Federal Native Plant Protection Act or the California Endangered Species Act; however, List 3 and 4 impacts to these species are generally considered in most CEQA analyses and are recommended by CNPS[11].

Table V.D-1
Summary of CNPS Lists 1, 2, 3, and 4

CNPS List	Comments
List 1A – Presumed Extinct in California	Thought to be extinct in California based on a lack of observation or detection for many years.
List 1B – Rare or Endangered in California and Elsewhere	Species generally rare throughout their range that are also judged to be vulnerable to other threats such as declining habitat.
List 2 – Rare or Endangered in California, More Common Elsewhere	Species rare in California but more common outside of California.
List 3 – Need More Information	Species that are thought to be rare or in decline, but CNPS lacks the information needed to assign to the appropriate list. In most instances, the extent of surveys for these species is not sufficient to allow CNPS to accurately assess whether these species should be assigned to a specific list. In addition, many of the List 3 species have associated taxonomic problems such that the validity of their current taxonomy is unclear.
List 4 – Plants of Limited Distribution	Species that are currently thought to be limited in distribution or range whose vulnerability or susceptibility to threat is currently low. In some cases, as noted above for List 3 species above, CNPS lacks survey data to accurately determine status in California. Many species have been placed on List 4 in previous editions of the "Inventory" and have been removed as survey data has indicated that the species are more common than previously thought. CNPS recommends that species currently included on this list should be monitored to ensure that future substantial declines are minimized.

CDFG maintains the California Natural Diversity Database (CNDDB), which is a program that inventories the status and locations of rare plants and animals in California. Each rare species or plant community is assigned an "element ranking" in the CNDDB which quantifies and qualifies the rarity of each species/community within its global and state range. The CNDDB gives five categories of rarity for

[11] *California Native Plant Society. 2001. Inventory of Rare and Endangered Plants of California (sixth edition). Rare Plant Scientific Advisory Committee, David P. Tibor, Convening Editor. California Native Plant Society. Sacramento, CA. x + 388pp.*

each species' global and state range[12]; these are summarized in Table V.D-2. All federal and state listed species are assigned a ranking; however, even non-listed species (such as Species of Concern, Special Animals, or plants on the CNPS list) are assigned an element ranking by CDFG for the CNDDB. Impacts to species which are assigned an element ranking in the CNDDB are considered under CEQA.

Table V.D-2
Summary of CNDDB Element Ranking Codes

Rank	Definition
Global Ranking*	
G1	Extremely endangered: less than 6 viable element occurrences (EOs) OR less than 1,000 individuals OR less than 2,000 acres
G2	Endangered: 6-20 EOs OR 1,000-3,000 individuals OR 2,000-10,000 acres
G3	Restricted range, rare: 21-80 EOs OR 3,000-10,000 individuals OR 10,000-50,000 acres
G4	Apparently secure; some factors exist to cause some concern such as narrow habitat or continued threats
G5	Demonstrably secure; commonly found throughout its historic range
State Ranking	
S1 – S5	Same as for Global Ranking, except that the rank is a reflection of the element throughout its state range, and a *Threat Rank* is attached (defined below)
.1	Very threatened
.2	Threatened
.3	No current threats known

**Subspecies receive a T-rank attached to the G-rank. A T-rank reflects the global situation of just that subspecies and not for the entire species; however, the rank values have the same definition.*

Waters of the State – Porter Cologne Act and CWA Section 401

"Waters of the State" are defined by the Porter-Cologne Act as "any surface water or groundwater, including saline waters, within the boundaries of the state." The RWQCB protects all waters in its regulatory scope, but has special responsibility for isolated wetlands and headwaters. These waterbodies have high resource value, are vulnerable to filling, and are not systematically protected by other programs. RWQCB jurisdiction includes "isolated" wetlands and waters that may not be regulated by the Corps under Section 404. "Waters of the State" are regulated by the RWQCB under the State Water Quality Certification Program which regulates discharges of fill and dredged material under Section 401 of the CWA and the Porter-Cologne Water Quality Control Act. Projects that require a Corps permit, or fall under other federal jurisdiction, and have the potential to impact "Waters of the State," are required to comply with the terms of the Water Quality Certification determination. If a proposed project does not require a federal permit, but does involve dredge or fill activities that may result in a discharge to "Waters of the State," the RWQCB has the option to regulate the dredge and fill activities under its state authority in the form of Waste Discharge Requirements or Certification of Waste Discharge Requirements.

[12] *California Department of Fish and Game. 2006. Special Animals (824 taxa). Biogeographic Data Branch, California Natural Diversity Database. February 2006.*

Streams, Lakes, and Riparian Habitat – Fish and Game Code Section 1600-1616

Streams and lakes, as habitat for fish and wildlife species, are subject to jurisdiction by the CDFG under Sections 1600-1616 of the State Fish and Game Code. Alterations to or work within or adjacent to streambeds or lakes generally require a 1602 Lake and Streambed Alteration Agreement. The term stream, which includes creeks and rivers, is defined in the California Code of Regulations (CCR) as follows: "a body of water that flows at least periodically or intermittently through a bed or channel having banks and supports fish or other aquatic life. This includes watercourses having a surface or subsurface flow that supports or has supported riparian vegetation" (14 CCR 1.72). In addition, the term stream can include ephemeral streams, dry washes, watercourses with subsurface flows, canals, aqueducts, irrigation ditches, and other means of water conveyance if they support aquatic life, riparian vegetation, or stream-dependent terrestrial wildlife.[13] Riparian is defined as, "on, or pertaining to, the banks of a stream;" therefore, riparian vegetation is defined as, "vegetation which occurs in and/or adjacent to a stream and is dependent on, and occurs because of, the stream itself."[14] Removal of riparian vegetation also requires a Section 1602 Lake and Streambed Alteration Agreement from CDFG.

Local

Mulholland Scenic Parkway Specific Plan

The project site lies within the Mulholland Scenic Parkway Specific Plan ("Specific Plan") area, which is comprised of Mulholland Drive right-of-way, inner corridor, outer corridor and the institutional use corridor. The project site is located within 500 feet of the Mulholland Scenic Parkway right-of-way, which is referred to as the Inner Corridor (see Table V.F-2 for the inner corridor regulations). The Specific Plan is intended to preserve, protect, and enhance the unique natural and cultural resources in the plan area. To accomplish these goals, the plan undertakes to provide that design and placement of buildings and other improvements preserves, compliments and/or enhances views; minimizes grading and assures that graded slopes will have a natural appearance. Additionally, the Specific Plan seeks to preserve the natural appearance compatible with the characteristics of the Santa Monica Mountains, including the following environmental resources: prominent ridges, streams, parklands, and oak trees.

City of Los Angeles Protected Tree Ordinance

In April 2006, the City of Los Angeles' Oak Tree Ordinance was amended to become the "Protected Tree Ordinance." Ordinance 177,404 amends Sections 12.21 A 12, 17.02, 17.05 H 7, 17.05 R, 17.06 B 13, 17.06 C, 17.51 D, and 17.52 I of the Zoning Code to assure the protection, and regulate the removal, of four species of native trees, specifically all native oaks (*Quercus* sp., with the exception of *Quercus dumosa*, aka *Q. berberidifolia*, scrub oak), Southern California black walnut (*Juglans californica*),

[13] *California Department of Fish and Game. Environmental Services Division (ESD). 1994. A Field Guide to Lake and Streambed Alteration Agreements, Sections 1600-1607, California Fish and Game Code.*

[14] *Same as above.*

Western (California) Sycamore (*Platanus racemosa*), and California bay laurel (*Umbellularia californica*).

Ordinance 177,404 provides that a protected species tree cannot be removed or relocated without first obtaining a permit from the Board of Public Works. The application for the permit must indicate the location of each protected species tree in the development area proposed to be retained, relocated or removed. Further, the Ordinance requires that for each protected species tree removed, a minimum of two trees of the same species (minimum 15 gallon size) shall be planted and that the size and number of the replacement trees shall approximate the value of the trees to be replaced.

In addition, because the proposed project site is within the Mulholland Scenic Parkway Specific Plan area a minimum of two oak trees (minimum of 36-inch box size) are to be planted for each one that is removed, any native tree removed must be replaced at a two for one ratio (minimum of 15 gallon size), and any non-native tree removed must be replaced at a one for one ratio (minimum of 15 gallon size). Further, a bond must be posted to guarantee the survival of trees which would be maintained, replaced or relocated to assure the existence of continuously living trees for a minimum of three years from the date the bond was posted or the trees were replaced or relocated.

ENVIRONMENTAL SETTING

The 6.19-acre project site is generally located in the foothills and north slopes of the Santa Monica Mountains, in the City of Los Angeles within the community of Woodland Hills. The project site is located on the northeast corner of Mulholland Drive and San Feliciano Drive. The site is specifically located in Section 24 of Township 1 North, Range 17 West of the Canoga Park 7.5-minute USGS topographic quadrangle, which depicts a USGS-designated blue line intermittent stream on-site. The Girard Reservoir (drained in 1989 and currently empty) is adjacent to and north of the project site.

The project site is situated at the lower transition zone between the Santa Monica Mountains and the San Fernando Valley. Generally, hilly terrain is present both on-site and in the general vicinity. Topography on-site ranges from gently-sloping in lower areas to hilly in the western and eastern central portions. Elevation on-site ranges from approximately 1,000 feet above mean sea level (msl) at the northern edge to approximately 1,048 feet above msl at the southwestern edge of the subject site.

The soils on-site generally consist of fill, alluvium, and bedrock[15]. The fill, which blankets the majority of the site, generally consists of uncompacted silty sand associated with previous grading efforts. Natural alluvium underlies the majority of the western and eastern portions of the subject site, and consists of silty sand, clayey sand, and sand which ranges from moist to saturated. Bedrock is present in the southern

[15] *The J. Byer Group, Inc. 2005. Geologic and Soils Engineering Exploration. March 22, 2005.*

portion of the project site and is comprised of siltstone and sandstone mapped as part of the Modelo Formation[16].

The project site, formerly a residential equestrian estate, is in various states of disrepair. Though there are disturbances throughout the site, the project site has not been substantially graded and substrates appeared to be relatively natural. The estate was developed within a coast live oak woodland, much of which remains on the site. Understory elements of the oak woodland are absent and have probably been removed over many years of residential/equestrian use. Natural understory components of the project site have been replaced with non-native grassland in the western half of the site and ornamental trees and typical residential landscaping in the approximate eastern half of the project site. One small knoll at the west edge of the site remains vegetated with mixed native grassland and coastal sage scrub elements.

Vegetation Communities

Five vegetation communities are present on-site. Coast live oak forest/woodland and non-native grassland are the dominant types on-site (Figure V.D-1). Smaller areas of coast live oak woodland/ornamental, mixed coastal sage scrub with purple needlegrass, and willow scrub are also present. These vegetation communities are described below.

Coast Live Oak Forest and Woodland

Coast live oak woodland (CLO) is located throughout the project site in fairly decent formations or cells. This vegetation community type is dominated by one tree species, coast live oak (*Quercus agrifolia*), and is comprised of mainly mature trees. The understory component is non-native grassland. The site contains 153 protected coast live oak trees, according to the *Horticultural Tree Report* for the project site, which is included as Appendix G-2 to this Draft EIR.

[16] *Dibblee, T.W. 1992. Geologic Map of the Topanga and Canoga Park (South ½) Quadrangles.*

Figure V.D-1, Vegetation Communities Map

Non-native Grassland

Non-native grassland (NNG) mapped on the project site contained various species of grasses, including ripgut brome (*Bromus diandrus*), foxtail chess (*Bromus madritensis* ssp. *rubens*), and barley (*Hordeum* sp.). Other non-native species detected within the NNG on-site consisted of horehound (*Marrubium vulgare*), London rocket (*Sisymbrium irio*), and prickly sow thistle (*Sonchus asper*). Habitat values were moderately low in non-native grassland areas. Isolated patches of NNG provide little value to wildlife as compared to naturally-occurring scrub and native grassland systems.

Coast Live Oak Woodland/Ornamental

Ornamental species were observed in close proximity to the home and other structures on-site and consists of various species including Mexican fan palm (*Washingtonia robusta*), bottle tree (*Brachychiton populneus*), and fig tree (*Ficus carica*). A complete inventory of ornamental tree species on the project site is depicted in the *Horticultural Tree Report* for the project site. The non-native ornamental vegetation is considered to be low in ecological value to wildlife due to 1) displacement of native plant species, 2) alleopathic suppression of understory plants, and 3) lowered potential for utilization by wildlife for cover and foraging.

Willow Scrub

Two small patches of willow scrub vegetation occur on-site; both patches are within the historic alignment of the non-jurisdictional blueline stream on the site. One patch is located at the south edge of the site, along Mulholland Drive at the location of a presumed drainage outlet into the project site. The second patch is found in the vicinity of the pond in the southwest corner of the project site. These willow scrub areas are very small in extent, and would not support the range of riparian species normally associated with this vegetation type. This community is dominated by one tree species, Arroyo willow (*Salix lasiolepis*).

Mixed Coastal Sage Scrub with Native Grassland

Remnant coastal sage scrub (CSS) mixed with purple needlegrass (*Nasella pulchra*), a native bunchgrass, is present on-site and limited to a very small knoll located in western portion of the project site along San Feliciano Drive. The CSS is comprised of a few shrubs of Menzie's goldenbush (*Isocoma menziesii*) and Palmer's goldenbush (*Ericameria palmeri*), as well as deerweed (*Lotus scoparius*) and California cudweed (*Gnaphalium californicum*). Purple needlegrass, a native bunchgrass, is also intermixed with the CSS in this area.

Wildlife

Wildlife values in areas surrounding the project site are moderately low. Urbanization surrounds the project site due to many decades of development in the Woodland Hills area. There are few native

communities remaining within this area, and those which remain have little to no value to wildlife due to lack of connectivity. Although the coast live oak woodland on-site remains relatively intact, the isolated nature of the woodland and habitat conversion of the understory to mainly non-native grassland and ornamental species displaces native habitat and introduces exotic species. Wildlife usage of the site is probably largely restricted to common and/or urbanized mammals, reptiles, and avian species.

Though the project site is disturbed and is considered to have a moderately low value to wildlife, a number of common and urban-tolerant species probably utilize the project site for foraging. Wildlife species observed and expected to occur on-site are presented in Appendix G-1. Some species (those adapted to urbanized areas) with high mobility, such as coyote (*Canis latrans*), red-tailed hawk (*Buteo jamaicensis*), great horned owl (*Bubo virginiensis*), and urban-tolerant songbirds utilize the project area on a transitory and sometimes regular basis, depending on environmental factors present within their primary habitat and their degree of fear of humans and human activities. Urban-tolerant birds observed on-site included, but were not limited to, black phoebe (*Sayornis nigricans*), house sparrow, mourning dove (*Zenaida macroura*), and house finch (*Carpodacus mexicanus*).

Habitat values within the site are substantially diminished because the areas adjacent to the site have become developed. The site is surrounded by existing development, heavily-traveled roadways, and highly disturbed areas. Because the site is isolated from any larger blocks of similar habitat, the limited extent of native vegetation communities on-site, and the corresponding low potential for movement through the disjunct parcels of open space or parkland in the vicinity, the site is not considered to be an important wildlife corridor.

Special Status Species

Plants

Based upon a review of the resources and databases available, as outlined in the Background and Methods discussion above, 41 special status plant species have been documented, or have the potential to occur, in the general vicinity of the project site. Table V.D-3, Sensitive Species Probability of Occurrence, summarizes the potential for occurrence for these plant species in the project site. One plant, Southern California black walnut (*Juglans californica*) was observed on-site during the site surveys. No other plants were determined to have a moderate or high potential for occurrence within the project site. Seventeen species are determined to have a low or moderately low potential to occur on-site, generally because of a species' limited distribution and/or very limited or degraded on-site habitat. Twenty-three of these species are determined to be not present in the project site because the site lacks all specific habitat requirements such as suitable elevation, soils, and plant community type.

Table V.D-3
Sensitive Species Probability of Occurrence

Species	Sensitive Species Status	Probability of Occurrence within Proposed Project
Plants		
California androsace (*Androsace elongata* ssp. *acuta*)	CNPS List 4.2 This species has no formal governmental status.	**Not Present**. Rare in southern California, this annual herb is found in chaparral, cismontone woodland, and coastal scrub. It is believed extirpated from LA County; Jepson reports a historic broad distribution, occurring from Oregon to Baja California, specifically in the South Coast region, on dry grassy slopes below 1200 meters. The CNPS specifically notes the Los Angeles County extirpation. It was not detected and its occurrence within the proposed project area seems improbable due to likely extirpation.
Aphanisma (*Aphanisma blitoides*)	CNPS List 1B.2 **FSC**	**Low**. This annual herb blossoms in April and May in coastal bluff scrub and coastal scrub. With a fairly wide historical distribution across more than one dozen coastal counties in California, aphanisma is in steep decline in the mainland as well as the Channel Islands. It currently is known from three (3) occurrences on San Nicholas Island and it only occurs below 100 meters above sea level. This species is not expected to occur due to the site being approximately 300 meters and greater above sea level. Focused surveys are not warranted.
Braunton's milk-vetch (*Astragalus brauntonii*)	CNPS List 1B.1 **FE**	**Low**. This perennial herb blooms from February to July. It was listed as federally endangered on 29 January 1997. It is known to occur in disturbed or burned areas of chaparral with gravelly clay soils, below 450 meters in elevation in the central south coast and the north Peninsular range (Los Angeles Basin). This species was not detected, nor would it be expected to occur due to a lack of suitable support habitat. Focused surveys are not warranted.
Coulter's saltbush (*Atriplex coulteri*)	CNPS List 1B.2 The species has no formal governmental listing.	**Not Present**. This perennial herb blooms from March through October in oceanside environments below 50 meters in elevation. It occurs in alkaline and clay conditions in a variety of habitat types, including coastal bluff scrub, coastal dunes, coastal scrub, and valley grasslands. According to the CNDDB, this species was last observed within Topanga Canyon near Fernwood in 1941. It would not be expected to occur on-site due to the site being approximately 300 meters and greater above sea level.
South Coast saltscale (*Atriplex pacifica*)	CNPS List 1B.2 **FSC**	**Not Present**. An annual herb which occurs in coastal bluff scrub and coastal scrub below 100 meters in elevation and blooms March through October. It would not occur on-site due to its distance from the coast and higher elevation.
Parish=s brittlescale (*Atriplex parishii*)	CNPS List 1B.1 The species has no formal governmental listing.	**Not Present**. This species occurs in chenopod scrub, playas, and vernal pools from 20 to 1900 meters. It blooms from June to October. Parish=s brittlescale is threatened by development, agriculture, and grazing. Siting of this species along the northern foot of the Santa Monica Mountains north of Griffith Park is documented in the CNDDB, however the year of the siting is not known. It was not detected and it is not expected to

Species	Sensitive Species Status	Probability of Occurrence within Proposed Project
		occur due to a lack of suitable support habitat.
Davidson's saltscale (*Atriplex serenana* var. *davidsonii*)	CNPS List 1B.2 The species has no formal governmental listing.	**Not Present**. Davidson=s saltscale is an annual herb which blooms from April through October, and is believed extirpated from Los Angeles County. It occurs below 200 meters in alkaline conditions in coastal bluff scrub and coastal scrub. This species is not expected to occur due to the property=s elevation being approximately 300 meters and above.
Plummer's baccharis (*Baccharis plummerae* ssp. *Plummerae*)	CNPS List 4.3 This species has no governmental listing status.	**Not Present**. This shrub is known to occur in rocky chaparral, or coastal scrub, and cismontane woodland habitats between 0 - 425 meters. It occurs on the central and south coast, the north Channel Islands, and the western Transverse Range. It was not detected within the proposed project area.
Nevin's barberry *(Berberis nevinii*)	CNPS List 1B.1 **FE**, **SE**	**Not Present**. This evergreen shrub blooms from March through April. It occurs in sandy or gravelly conditions in coastal scrub, chaparral, cismontane woodland, and riparian scrub below 350 meters. According to the draft Griffith Park Master Plan (2004), this species occurs in two (2) separate areas within Griffith Park. It was not detected on-site.
Brewer's calandrinia (*Calandrinia breweri*)	CNPS List 4.2 No formal governmental listing.	**Low**. Brewer's calandrinia is an annual herb which flowers from March through June. It is found most often in sandy to loamy soil, disturbed sites, and burns. The plant has a broad distribution throughout the western Transverse range and along the California coast from San Francisco to Baja, but is considered uncommon where it still occurs. It is not expected to occur on-site. Focused surveys are not warranted.
Catalina mariposa lily (*Calochortus catalinae*)	CNPS List 4.2 This species has no governmental listing status.	**Moderately Low**. This perennial bulbiferous herb is found in heavy soils, coastal scrub, and open grasslands below 700 meters and blooms from February through May. It is distributed in the south central coast and the west south coast, especially in the Channel Islands. It was not detected on-site, nor would it be expected to occur due to the highly disturbed condition of the site. Remnant CSS/NG on-site represents potential support habitat, though it consists of less than 0.25 acre. Focused surveys are not warranted.
Plummer's mariposa lily (*Calochortus plummerae*)	CNPS List 1B.2 No formal governmental listing.	**Moderately Low**. This perennial herb is considered to be rare by the *Jepson Manual.* This plant is generally found on dry, rocky slopes within chaparral communities from the Santa Monica Mountains to the San Jacintos usually below 5000'. This species blooms from May to July. According to the CNDDB, this species was last observed in 1992 at the intersection of Mulholland Drive and Encino Hills Drive. This species would not have been detected during Winter surveys on-site. It would not be expected to occur on-site due to the highly disturbed condition of the site. Remnant CSS/NG on-site represents potential support habitat, though it consists of less than 0.25 acre. Focused surveys are not warranted.
Alkali mariposa lily (*Calochortus striatus*)	CNPS List 1B.2 **FSC**	**Not Present**. As the common name implies, this mariposa lily is generally found in alkaline conditions, a sub-habitat type not present on-site.

Species	Sensitive Species Status	Probability of Occurrence within Proposed Project
Intermediate mariposa lily (*Calochortus weedii* var. *intermedius*)	CNPS List 1B.2 **FSC**	**Not Present.** This plant occurs from the central south coast and north Peninsula Ranges, therefore, is not within the region. The plant blooms from May through July, in rocky environments in chaparral, coastal scrub and valley grasslands below 680 meters. This species would not have been detected during Winter surveys on-site. It would not be expected to occur on-site due to the highly disturbed condition of the site. Remnant CSS/NG on-site represents potential support habitat, though it consists of less than 0.25 acre and lacks rocky substrates. Focused surveys are not warranted.
Santa Barbara morning glory (*Calystegia sepium* ssp. *binghamiae*)	CNPS List 1A No formal governmental listing.	**Not Present**. Believed to be extirpated from Los Angeles County, this plant occurs only in salt marshes, therefore, it would not occur on-site.
Lewis's evening primrose (*Camissonia lewisii*)	CNPS List 3 No formal governmental listing.	**Low**. This coastal annual herb occurs in grasslands in sandy or clay soils between sea level and 300 meters in elevation on the south coast, west Peninsular Range, and northern Baja. The blooming period is from March to June. Degraded ecological conditions of the site would likely preclude this species from occurring.
San Fernando Valley spineflower (*Chorizanthe parryi var. Fernandina*)	CNPS List 1B.1 **FC, SE**	**Not Present**. The CNDDB reports that this species is believed to be extirpated from the Los Angeles area and, was last observed in 1901 near the Chatsworth Park. Found in coastal sage scrub habitats with sandy soils. It was not detected and its occurrence within the proposed project area seems improbable due to substrate composition and likely extirpation from the Los Angeles area.
Santa Susana tarplant (*Deinandra minthornii*)	CNPS List 1B.2 **SR**	**Low**. The CNDDB reports that this species was last observed in 1995 north of the Chatsworth Reservoir, approximately 0.6 mile north of Valley Circle Boulevard. Found in chaparral and coastal scrub habitats with rocky substrates. It blooms from July to November, and occurs between 280 to 760 meters. This species would not have been detected during Winter surveys on-site. It is not expected to occur within the proposed project area due to the lack of rocky substrates. Focused surveys are not warranted.
slender-horned spineflower (*Dodecahema leptoceras*)	CNPS List 1B.1 **FE, SE**	**Low.** This species requires flood deposited terraces and washes in chaparral/coastal scrub. It is considered to be extirpated from much of the Los Angeles area. It was not detected within the subject site. This species would not have been detected during Winter surveys on-site. It is not expected to occur within the proposed project area due to probable extirpation from the Los Angeles area. Focused surveys are not warranted.
Blochman's dudleya (*Dudleya blochmaniae* ssp. *blochmaniae*)	CNPS List 1B.1 No formal governmental listing.	**Not Present**. This *Dudleya* grows in clayey or serpentine soils within coastal bluff scrub, coastal scrub, and chaparral communities between 5 and 450 meters. The CNDDB reports this species being observed near the Chatsworth Reservoir, though the date and specific location of the sighting are not listed. No *Dudleya* sp. were detected on-site during field

Species	Sensitive Species Status	Probability of Occurrence within Proposed Project
		surveys.
Many-stemmed dudleya (*Dudleya multicaulis*)	CNPS List 1B.2 **FSC**	**Not Present**. This *Dudleya* grows in heavy or clayey soils near the coastal plain, below 600 meters throughout the south coast (Los Angeles, Orange, San Bernardino, San Diego, and Riverside counties). This species was last observed in 1925 in the vicinity of Hollywood Reservoir. No *Dudleya* sp. were detected on-site during field surveys.
round-leaved filaree (*Erodium macrophyllum*)	CNPS List 2.1 The species was rejected for government listing status.	**Low**. Round-leaved filaree occurs in cismontane woodlands and valley and foothill grasslands. It is found in clay soils between 15 and 1200 meters above sea level and blooms from March to May. Substrates on-site would not be expected to support this species. Focused surveys are not warranted.
Palmer's grappling hook (*Harpagonella palmeri*)	CNPS List 4.2 **FSC**	**Low.** This annual herb grows in dry sites in chaparral, coastal scrub, and grassland below 450 meters. The species has a broad distribution throughout the south coast, Peninsular ranges, Arizona, and into Mexico. This species would not have been detected during Winter surveys on-site. It would not be expected to occur on-site due to the highly disturbed condition of the site. Focused surveys are not warranted.
Los Angeles sunflower (*Helianthus nuttallii* ssp. *parishii*)	CNPS List 1A **FSC**	**Not Present.** This plant was last observed in 1937 and, until recently, was believed extinct. A possible occurrence in Santa Clarita has been recently reported. It was not detected on-site.
Vernal barley (*Hordeum intercedens*)	CNPS List 3.2 This species has no formal governmental listing status.	**Not Present**. This species occurs in vernal pools, alkali flats and ephermeral saline streams below 1000 meters throughout southwestern California. It would not occur on-site due to a lack of suitable support habitat.
Mesa horkelia (*Horkelia cuneata puberula*)	CNPS List 1B.1 This species has no formal governmental listing status.	**Not Present.** Requires sandy or gravelly sites within either chaparral, cismontane woodland, or coastal sage scrub. Mesa horkelia is presumed extirpated from the Los Angeles area due to development. The last recorded observation of this species was approximately 1.5 miles northwest of the Glendale Freeway and Highway 210 intersection in 1948. This perennial herb blooms from February through September, and was not detected during field surveys.
Southern California black walnut (*Juglans californica*)	CNPS List 4.2 This species has no formal governmental listing status.	**Confirmed Present.** This species occurs on slopes and in canyons between 50 - 900 meters along the south coast, south Transverse ranges, and north Peninsular ranges. Walnut forest is a much fragmented, declining natural community. Eleven (11) walnut trees were detected on the property.
Coutler's goldfields (*Lasthenia glabrata* ssp. *coulteri*)	CNPS List 1B.1 **FSC**	**Not present**. Although now quite rare, this subspecies was historically widely distributed across southwestern California and into the western Mojave desert. It blossoms February through June. It was not detected on-site, nor would it be expected to occur due to the lack of marshes, playas, vernal pools, or broad floodplains.
fragrant pitcher	CNPS List 4.2	**Not Present**. This shrub species is known to occur, but

Species	Sensitive Species Status	Probability of Occurrence within Proposed Project
sage (*Lepechinia fragrans*)	This species has no formal governmental listing status.	considered uncommon in the south coast area, in chaparral below 1100 meters in elevation. It was not detected during field surveys.
Robinson's pepper-grass (*Lepidium virginicum* var. *robinsonii*)	CNPS List 1B.2 This species has no formal governmental listing status.	**Low**. This species is found in dry shrublands throughout the southwest region below 500 meters. It is an annual herb that blooms from January through July. It was not detected during Winter field surveys, nor would it be expected to occur due to the highly disturbed condition of the site.
ocellated Humboldt lily (*Lilium humboldti ocellatum*)	CNPS List 4.2 **FSC**	**Not Present**. Species favors dense, shaded riparian habitats with abundant moisture and little disturbance. Often growing from canyon walls or in dense leaf litter flowering in June and July. No lilies were detected, nor is it expected to occur due to a lack of suitable support habitat.
Davidson's bush mallow (*Malacothamnus davidsonii*)	CNPS List 1B.2 This species has no formal governmental listing status.	**Not Present.** This species requires sandy washes within coastal sage scrub, riparian woodlands, or chaparral. According to the CNDDB, 100-200 plants of this species were found in Cabrini Canyon. This species was not detected on-site.
small-flowered microseris (*Microseris douglasii* var. *platycarpha*)	CNPS List 4.2 This subspecies has no formal governmental listing status.	**Not Present.** Found in clayey soils associated with vernal pools, grasslands and similar habitats, this subspecies occurs below 1000 meters in the south coast region, probably including coastal Los Angeles County. This species is not expected to occur due to a lack of clay soils.
California spineflower (*Mucronea californica*)	CNPS List 4.2 This species has no formal governmental listing status.	**Low.** The California spineflower occurs in a relatively broad distribution across south central and southern coastal California, in sandy conditions below 1400 meters. This species would not have been detected during Winter surveys on-site. It would not be expected to occur on-site due to the highly disturbed condition of the site. Focused surveys are not warranted.
California muhly (*Muhlenbergia californica*)	CNPS List 4.3 This species has no government listing status.	**Low**. This now uncommon species occurs in wet habitats, in chaparral, forests, scrub and meadows throughout the western Transverse and south coast regions with an elevational range between 100 and 2000 meters, making its natural distribution quite broad. This species is not expected to occur due to a lack of suitable support habitat.
Prostrate navarretia (*Navarretia prostrata*)	CNPS List 1B.1 No formal governmental listing status.	**Low**. This species was found historically on alkali soils in vernal pools or grasslands. It is thought to be extirpated from the Los Angeles area, and would not be expected to occur on-site due a lack of support habitat.
Lyon's Pentacheata (*Pentacheata lyonii*)	CNPS List 1B.1 **FE, SE**	**Low**. This species is most often found on open, sandy or gravelly substrates in native grassland or around the margins of exposed granitic rocks, occurring in chaparral, grassland, and coastal sage scrub. It has been detected along Malibu Creek in the vicinity of Tapia Park. This species would not have been detected during Winter surveys on-site. It would not be expected to occur on-site due to the highly disturbed condition of the site. Focused surveys are not warranted.
Gairdner's		**Low**. Thought to be extirpated from Los Angeles County, this

Species	Sensitive Species Status	Probability of Occurrence within Proposed Project
yampah (*Perideridia gairdneri* ssp. *gairdneri*)	CNPS List 4.2 **FSC**	perennial herb occurs in grasslands, broad-leaved upland forests, chaparral, and coastal flats below 350 meters. This species would not have been detected during Winter surveys on-site. It would not be expected to occur on-site due to site conditions being generally unsuitable. Focused surveys are not warranted.
Brand's phacelia (*Phacelia stellaris*)	CNPS List 1B.1 **FC**	**Low**. This plant is probably extirpated from Los Angeles County according to the *CNPS Inventory*, as historical occurrences have been lost to development. It occurs in coastal dunes and coastal scrub, below 400 meters. It is not likely to occur within the site due to disturbance factors.
Rayless ragwort (*Senecio aphanactis*)	CNPS List 2.2 The species has no formal governmental status.	**Not Present**. The distribution of this species includes central western California, the south coast region, the Channel Islands, and Baja California, however, its habitat is limited to drying alkaline flats below 400 meters. The CNPS Inventory describes its habitat as including cismontane woodlands, which seems somewhat at odds with its alkaline condition requirements. It is reported as rare in Los Angeles County, and is not expected to occur on-site due to a lack of suitable support habitat.
Sonoran maiden fern (*Thelypteris puberula var. sonorensis*)	CNPS List 2.2 The species has no government listing status.	**Not Present**. Found primarily along stream courses, seepage areas, stream banks, and meadows, this species prefers undisturbed wetland habitats that are open and exposed. This species is not expected to occur on-site due to a lack of suitable support habitat. No ferns were identified on-site.
Invertebrates		
monarch butterfly (*Danaus plexippus*)	The monarch is considered a **Special Animal** in the *CNDDB* while present at winter roost sites, otherwise, it has no formal state or federal listing status.	**Not Present (Roosting Sites)**. The subject site is not coastal, rather, it lies within an interior valley which occasionally freezes in the winter, making it an unlikely roost site. The monarch butterfly's winter roost sites extend along the coast from northern Mendocino County to Baja California, Mexico. Typically, all roost sites are in tall dense groves of trees (such as oaks, pines, cypress, or *Eucalyptus*), in wind-sheltered sites near the coast. The *CNDDB* lists several localities for winter roosts for this butterfly locally, but specific locational information on winter roost sites is limited.
Santa Monica shieldback katydid (*Neduba longipennis*)	**FSC**	**Low**. This species is often difficult to detect without focused surveys and its presence cannot be adequately determined or interpreted without such surveys due to insufficient life history data. From what is known about this organism, it is known to feed on chaparral vegetation and non-native ice-plant. Focused surveys not warranted.
Santa Monica mountains hairstreak butterfly (*Satyrium auretorum fumosum*)	**FSC**	**Low**. This subspecies was described from the vicinity Malibu Lake, and is only known from a few local colonies in the Santa Monica Mountains. The larval host, coastal scrub oak (*Quercus berberidifolia*,aka *Q. dumosa*), does not occur on-site, therefore, this species likely does not occur.
		Not Present. The highly localized skipper is found entirely

Species	Sensitive Species Status	Probability of Occurrence within Proposed Project
wandering (saltmarsh) **skipper** (*Panoquina errans*)	**FSC**	along the coastal strand of southern California. It favors dune and marsh habitats that are grown to saltgrass (*Distichlis spicata*), which serves as its larval host. No suitable habitat exists on the subject site.
Reptiles		
southwestern pond turtle (*Clemmys marmorata pallida*)	**CSC**	**Not Present**. The western pond turtle inhabits permanent or nearly permanent bodies of water in a number of habitat types below 1800 meters. It requires basking sites such as logs, rocks, vegetation mats, or open mud banks. According to the CNDDB, this species was last observed in 1917. However, information for this species is suppressed due to the high sensitive nature of this species. No suitable habitat is present on-site.
horned lizard (*Phrynosoma coronatum* ssp.)	**FSC, CSC**	**Moderate**. Favorable habitat for this lizard includes open, flat, sandy areas in which several colonies of harvester ants (*Pogonomermex* sp.) are established, as ants are the horned lizard=s preferred food item. Plant communities associated with habitation of the horned lizard include coastal sage scrub. Although the date of the sighting is not specified, this species was observed approximately 2.5 miles southwest of the subject site near Topanga Canyon. Marginally suitable habitat is present on-site.
coast patch-nosed snake (*Salvadora hexalepis virgultea*)	**FSC, CSC**	**Moderately High**. The coast patch-nosed snake is mostly active during early morning hours, basking until temperatures get too warm. This species is infrequently encountered, and is found in the lower slopes of dry scrub, chaparral, and oak woodland habitats, in rocky, sandy areas. It feeds upon lizards and small mammals. Suitable habitat is present on-site.
San Bernardino ringneck snake (*Diadophis punctatus modestus*)	**FSC**	**Moderately High**. The San Bernardino ringneck snake occurs in shaded oak forest canyons, where it is most often found beneath rocks and logs, but also occurs in scrub habitats. It feeds upon smaller amphibians and invertebrates. This species is primarily active above ground in Spring and early Summer, after which time it retreats to subterranean burrows and crevices. Suitable habitat is present within the subject site.
San Diego mountain kingsnake (*Lampropeltis zonata pulchra*)	**CSC**	**Moderate**. The San Diego mountain kingsnake inhabits mountainous regions across Southern California. It prefers moist woods, coniferous forests, oak woodlands, and chaparral. It not only inhabits mountainous areas, but canyons down to sea level in the Santa Monicas. They are quite secretive, residing in rock crevices or beneath rock and debris piles. Moderately suitable habitat is present on-site.
silvery legless lizard (*Aniella pulchra*)	**FSC, CSC**	**Moderate**. This burrowing species feeds upon small, soft-bodied arthropods, often in the lower layers of chaparral or oak woodland leaf duff, less often along stream courses in loose alluvium. Moderately suitable habitat is present within on-site.

Species	Sensitive Species Status	Probability of Occurrence within Proposed Project
coastal whiptail (*Cnemidophorus tigris stejnegeri*)	**FSC**	**Confirmed Present**. The coastal western whiptail usually inhabits dryer, scrub environments, and is somewhat tolerant of disturbances. It is often active later in the year, from May to late September, and usually during hotter times of the day, when other lizards are inactive. This species was detected during field surveys.
Hammond two-striped garter snake (*Thamnophis hammondii hammondii*)	**FSC, CSC**	**Low.** This species habitat preferences are stream-side habitats that form pools where amphibian larvae concentrate, allowing the garter snake to gorge itself on this prey. Year-round surface water is not required for this species= presence, however, it is most often found in riparian systems in which surface water is present through the Summer. This species likely does not occur on-site due to a lack of suitable support habitat.
Amphibians		
arroyo toad (*Bufo californicus*)	**FE, CSC**	**Not Present**. The arroyo toad is a habitat specialist in that it requires slow-flowing water, and pools no more than four inches deep for egg deposition. Habitat on-site is not suitable for this species.
California red-legged frog (*Rana aurora draytonii*)	**FT, CSC**	**Not Present**. This species requires dense riparian habitat (willows, cattails, and sedge) with slow-flowing water. Habitat on-site is not suitable for this species.
western spadefoot toad (*Spea hammondi*)	**FSC, CSC**	**Moderately Low**. This species is generally found in washes, lowlands, stream courses, floodplains, vernal pools and other xeric areas. Preferred habitat association include chaparral, oak woodland, coastal sage scrub, riparian woodland, and grassland. The spadefoot toad breeds in seasonal ponds and vernal pools in both upland and lowland areas. This toad is active later in the season than other amphibians (e.g. February - June). Marginal breeding habitat is present on-site, but surrounding habitats are highly degraded due to urbanization.
coast range newt (*Taricha torosa torosa*)	**CSC**	**Not Present**. Populations of the coast range newt are scattered throughout the Santa Monica Mountains, and are confined to slow-moving streams and pools in which surface flows last year-round, as their larvae require one year to develop. Habitat on-site is not suitable for this species.
Birds		
Bell's sage sparrow (*Amphispiza belli belli*)	**FSC, CSC**	**Moderate**. This species is typically found in coastal sage scrub and chaparral habitats and it may occur adjacent to the proposed project work areas. Sage sparrows occur in the general vicinity of the subject site but were not, however, observed on-site.
Cooper's hawk (*Accipiter cooperii*)	**CSC**	**Moderately High**. This species is a widespread predator that specializes on other birds as prey species. The oak woodland on-site constitutes suitable habitat for the Coopers= hawk, therefore, the occurrence of this species on-site is likely.
Golden eagle (*Aquila chrysaetos*)	**CSC** The species is also protected under the Bald	**Low**. These large birds of prey likely do not utilize the subject site due to the frequency of human disturbance.

Species	Sensitive Species Status	Probability of Occurrence within Proposed Project
	Eagle Protection Act.	
Southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*)	**CSC**	**Moderately Low**. This subspecies is typically found in coastal sage scrub and chaparral habitats. It has a fairly wide distribution in southern California. Although marginal suitable habitat is present, this species is likely not a resident on-site, though it may utilize the site as a migratory stopover.
Burrowing Owl (*Athene cunicularia*)	**CSC**	**Not Present**. This species of owl is unique in that it utilizes the burrows of large, fossorial mammals (i.e. California ground squirrel) for both wintering and nesting. It is usually found in open grasslands or scrublands with low-growing vegetation. According to the CNDDB, it was last observed near the property in 1921. No burrowing owl or burrowing owl sign (i. e., feathers, pellets, and wash) were detected on-site.
western yellow-billed cuckoo (*Coccyzus americanus occidentalis*)	**SE**	**Not Present**. Habitat within the subject site is not suitable for western yellow-billed cuckoo, which inhabits dense riverine woodlands.
yellow warbler (*Dendroica petechia brewsteri*)	**CSC (nesting)**	**Not Present**. This species breeds locally in the dense understory of riparian thickets. This species is not expected to nest on-site due to a lack of suitable support habitat.
willow flycatcher (*Empidonax trailli* all subspecies)	**FE, SE**	**Not Present**. This species breeds in the dense understory of riparian thickets. This species is not expected to occur on-site due to a lack of suitable support habitat.
yellow breasted chat (*Icteria virens*)	**CSC**	**Not Present**. This species breeds in the dense understory of riparian thickets. This species is not expected to occur on-site due to a lack of suitable support habitat.
coastal California gnatcatcher (*Polioptila californica californica*)	**FT, CSC**	**Low**. The California gnatcatcher is a habitat specialist in that it requires coastal sage scrub. There is a recorded sighting of an individual in 1991 at Verdugo Mountain Park, across the San Fernando Valley. Though records exist for California gnatcatcher (CAGN) in the Cahuenga Pass area, no CAGN have been observed in this area for decades. Although a small pocket of degraded coastal sage scrub persists on the property, CAGN is not expected to occur.
least Bell's vireo (*Vireo bellii pusillus*)	**FE, SE**	**Not Present**. This riparian-obligate species generally requires less-disturbed areas of dense willow-associated riparian habitat and prefers areas with standing water. No suitable habitat is present on-site.
Mammals		
California leaf-nosed bat (*Macrotus californicus*), **Pallid bat**	The listing status of the **California leaf-nosed bat** is **FSC**, **CSC**. The listing status of the **Pallid bat** is **CSC**. The	**Moderately Low**. Several bat species might forage for flying insects over or within the subject site. Rock outcrops off-site locally would serve as suitable roosting locations, but we did not detect potential roost sites within the project area. None of the bat species potentially-occurring in the area would be

Species	Sensitive Species Status	Probability of Occurrence within Proposed Project
(*Antrozous pallidus*), **Pale big-eared bat** (*Plecotus townsendi pallescens*),and a number of species in the genus *Myotis*, including **small-footed bat**, **long-eared bat**, **fringed bat**, **long-legged bat** and the **Yuma bat**, **Western yellow bat** (*Lasiurus xanthinus*), and **big free-tailed bat** (*Nyctinomops macrotis*)	listing status of the **Pale big-eared bat** is **FSC**, **CSC**. The listing status of the **small-footed bat** is **FSC**. The listing status of the **long-eared bat** is **FSC**. The listing status of the **fringed bat** is **FSC**. The listing status of the **long-legged bat** is **FSC**. The listing status of the **Yuma bat** is **FSC**. **Western yellow bat** and **big free-tailed bat** have no formal governmental listing status.	dependent upon resources which would be altered with the implementation of the proposed project.
Ringtail (*Bassariscus astutus octavus*)	**SFP**	**Low**. The secretive, nocturnal ringtail is difficult to detect, but has been recorded historically from sites in the Santa Monica Mountains. Ringtails usually forage and move in riparian areas, therefore, this species likely would not occur on-site.
San Diego desert woodrat (*Neotoma lepida intermedia*)	**FSC, CSC**	**Moderate**. This species is rather widely distributed throughout southern California in sage scrub, chaparral and desert regions. It prefers rocky areas, nesting in cracks and crevices, while the sympatric dusky-footed woodrat (*N. fuscipes*) nests in shrubs and occasionally in trees. A woodrat nest was detected within a coast live oak, which *N. fuscipes* likely inhabits.
southern grasshopper mouse (*Onychomys torridus ramona*)	**CSC**	**Low**. According to the CNDDB, this species was last observed in the Los Angeles area in the Tujunga Valley in 1904. It is a predatory mouse feeding primarily on invertebrates, but will also feed upon lizards, salamanders, and other mice. Inhabits scrub in desert areas with friable soils for digging. Likelihood of occurrence within the proposed project site is low due to limited support habitat.
Los Angeles pocket mouse (*Perognathus longimembris brevinasus*)	**FSC, CSC**	**Moderately Low**. Pocket mice are the smallest members of the family Heteromyidae. Los Angeles pocket mouse is generally believed to occur in low elevation grasslands and sage scrub. Marginally suitable habitat is present on-site, however, the probability of occurrence is not considered likely.

Southern California black walnut is a CNPS List 4.2 plant, meaning that it is a species of limited distribution ("watch list") and is considered fairly endangered in California[17], and has been assigned sensitivity rankings of G3 and S3.2 by CDFG, meaning that it is considered to be threatened and rare/restricted in its global and statewide range (refer to Table IV.D-2 for rank definitions). This species occurs in chaparral, cismontane woodland and coastal scrub habitats on alluvial soils in canyons or on slopes between 50 and 900 meters in elevation[18]. Walnut forest is a much fragmented, rare, and declining vegetation community threatened by urbanization and grazing, and possibly by lack of natural reproduction[19]. Eleven (11) Southern California black walnut trees were observed on the project site during the site visits.

Wildlife

Thirty-two special status species of wildlife have been recorded, or have the potential to occur, in the vicinity of the project site: four invertebrates, eight reptiles, four amphibians, 11 birds and five mammals. Table V.D-3 summarizes the potential for occurrence for these species. Twenty-three species were considered to be not present due to a lack of habitat, or to have a low to moderately low potential to occur on-site due to a species' limited distribution, very limited or degraded on-site habitat, or due to the isolation of habitat due to surrounding development. Eight species are considered to have a moderate or moderately high potential to occur on-site and one species was observed on-site during surveys: Coastal western whiptail lizard (*Aspidoscelis tigris stejnegeri*), a federal species of concern. These species are discussed in further detail below.

Confirmed Present

Coastal western whiptail (*Aspidoscelis* [formerly *Cnemidophorus*] *tigris stejnegeri*), Federal Species of Concern. The coastal western whiptail lizard is a federal species of concern and has been assigned a sensitivity ranking of G5T3T4S2S3 by CDFG, meaning that while the species is considered to be demonstrably secure and/or commonly found throughout its historic global range, the subspecies is considered to range from apparently secure (some factors exist to cause some concern such as narrow habitat or continued threats) to rare or restricted in its global range, and is considered endangered to restricted/rare in its statewide range (see Table IV.D-2 for rank definitions). This species is found in deserts and semiarid areas with sparse vegetation and open areas in dry scrub environments, woodland

[17] *California Native Plant Society (CNPS). 2006. Inventory of Rare and Endangered Plants (online edition, v7-06b). California Native Plant Society. Sacramento, CA. http://www.cnps.org/inventory*

[18] *California Department of Fish and Game. 2006. Natural Diversity Database, Wildlife and Habitat Data Analysis Branch. Sacramento.*

[19] *California Native Plant Society (CNPS). 2006. Inventory of Rare and Endangered Plants (online edition, v7-06b). California Native Plant Society. Sacramento, CA. http://www.cnps.org/inventory*

and riparian habitats on firm, sandy or rocky soil[20]. The coastal western whiptail lizard is somewhat tolerant of disturbances and is often active later in the year, from May to late September, and usually during hotter times of the day, when other lizards are inactive. Several individuals were detected on-site during the field surveys.

Moderately High Potential

Cooper's hawk (*Accipiter cooperii*), State Species of Concern. The Cooper's hawk nests in interrupted and/or marginal woodland habitats or in riparian habitat in canyon bottoms and along rivers floodplains. This species is a widespread predator that specializes on other birds as prey. The oak woodland habitat on-site constitutes suitable habitat for this species; therefore, its occurrence is likely on-site.

San Bernardino ringneck snake (*Diadophis punctatus modestus*), Federal Species of Concern. The San Bernardino ringneck snake occurs in shaded oak forest canyons, where it is most often found beneath rocks and logs, but also occurs in scrub habitats. It feeds upon smaller amphibians and invertebrates. This species is primarily active above ground in spring and early summer, after which time it retreats to subterranean burrows and crevices. Suitable habitat is present within the subject site.

Coast patch-nosed snake (*Salvadora hexalepis virgultea*), Federal and State Species of Concern. The coast patch-nosed snake is found in the lower slopes of dry scrub, chaparral, and oak woodland habitats, in rocky, sandy areas. This species is infrequently encountered, and is mostly active during early morning hours basking until temperatures get too warm. It feeds upon lizards and small mammals. Suitable habitat is present on-site.

Moderate Potential

Bell's sage sparrow (*Amphispiza belli belli*), Federal and State Species of Concern. Bell's sage sparrow is typically found in coastal sage scrub and chaparral habitats. This species occurs in the general vicinity of the Project site. Bell's sage sparrow was not observed on-site during site surveys but may occur adjacent to the proposed project work areas.

Silvery legless lizard (*Aniella pulchra*), Federal and State Species of Concern. The silvery legless lizard is a burrowing species that feeds on small, soft-bodied arthropods, often in the lower layers of chaparral or oak woodland leaf duff, and less often along stream courses in loose alluvium. Moderately suitable habitat for this species is present on-site.

San Diego mountain kingsnake (*Lampropeltis zonata pulchra*), State Species of Concern. The San Diego mountain kingsnake inhabits mountainous regions across Southern California, including canyons down to

[20] *California Department of Fish and Game. 2006. Natural Diversity Database, Wildlife and Habitat Data Analysis Branch. Sacramento.*

sea level in the Santa Monica Mountains. It prefers moist woods, coniferous forests, oak woodlands, and chaparral habitats. This species is secretive, residing in rock crevices or beneath rock and debris piles. Moderately suitable habitat for this species is present on-site.

San Diego desert woodrat (*Neotoma lepida intermedia*), Federal and State Species of Concern. The San Diego desert woodrat is widely distributed throughout Southern California in sage scrub, chaparral and desert regions. It prefers rocky area, nesting in cracks and crevices, while the sympatric dusky-footed woodrat (*N. fuscipes*) nests in shrubs and occasionally in trees. A woodrat nest was detected within a coast live oak, which *N. fuscipes* likely inhabits; however, there is a moderate potential for the San Diego desert woodrat to occur on-site.

Horned lizard (*Phrynosoma coronatum* ssp.), Federal and State Species of Concern. The horned lizard is generally found in coastal sage scrub habitat in open, flat, sandy areas in which several colonies of harvester ants (*Pogonomermex* sp.) are established, which are their preferred food source. An undated sighting of this species is recorded in the CNDDB approximately 2.5 miles southwest of the project site near Topanga Canyon. Marginally suitable habitat for the horned lizard is present on-site.

Sensitive Natural Communities

Purple Needlegrass Grassland. One plant community, purple needlegrass, is present on-site. Purple needlegrass grassland is considered a rare vegetation community important for inventory purposes by the CNDDB[21], and Valley needlegrass grassland (dominated by purple needlegrass [*Nasella pulchra*]) has been assigned a sensitivity ranking of G1 S3.1 in the CNDDB (see Table IV.D-2). The purple needlegrass grassland on-site is small and is located on an isolated knoll along San Feliciano Drive. This area supports scattered tufts of purple needlegrass interspersed with a compendium of non-native grasses and herbaceous plants (such as foxtail chess, wild oat [*Avena* sp.], and tocalote [*Centaurea melitensis*] and native herbaceous plants (such as California cudweed [*Gnaphalium californicum*] and telegraph weed [*Heterotheca grandiflora*]). Along the fenceline at San Feliciano Drive, several plants indicative of coastal sage scrub habitats are growing (such as goldenbush).

Coast Live Oak Woodland. Although the coast live oak woodland plant community is listed in the CNDDB, it is only assigned a sensitivity ranking of G4 S4, which means that this plant community is apparently secure, although factors exist to cause some concern (see Table IV.D-2). And although CEQA statute §21083.4 requires consideration of impacts and mitigation for oak woodlands, this only applies when Counties retain jurisdiction over a parcel; for the proposed project, the City of Los Angeles retains jurisdiction and, therefore, this CEQA statute does not apply. Coast live oak woodland and forest plant communities are well distributed throughout southern California and the Santa Monica Mountains, which

[21] *California Department of Fish and Game. 2003. List of California Terrestrial Natural Communities Recognized by the California Natural Diversity Database. Wildlife and Habitat Data Analysis Branch, Vegetation Classification and Mapping Program. September 2003.*

is in the project vicinity to the south. In addition, the project would retain much of the existing oak woodland/forest habitat on-site, the majority of which is located along the southern and eastern boundaries and in the northeastern corner of the project site.

Willow Scrub. Willow scrub is often considered a sensitive plant community as it is usually associated with creeks and riparian habitat. Many riparian plant communities dominated by willows are listed as sensitive in the CNDDB; however, the willow scrub on-site is not located within riparian habitat or along a watercourse of any kind and, therefore, would not meet the definitions of any of the sensitive riparian plant communities. Willow-dominated plant communities are also often considered sensitive as they are regulated under the jurisdiction of CDFG (Section 1600 of the Fish and Game Code) when located on stream banks or lake shores as riparian habitat; however, the willows on-site are not associated with stream banks or lake shores. In addition, the willow scrub patches on-site are small, isolated, and are comprised of relatively few trees.

Jurisdictional Resources

A USGS-designated blue line stream is depicted on-site on the 1967 Canoga Park 7.5-mintue USGS quadrangle. The blue line stream has since been modified on-site and off-site such that northerly flows are now intercepted under Mulholland Drive and conveyed into a subdrain and no longer flow onto the project site. The only water which now enters the site originates as surface runoff from Mulholland Drive which flows down the steep slope from the road onto the site; this ephemeral sheet flow has created erosional gullies on the steep slope along Mulholland Drive, and installation of a curb along the north side of the road would likely eliminate this condition. This runoff appears to either disperse onto the surface of the site or enter into the groundwater table once it reaches level ground, as there are no indicators of ponding, dominance of hydrophytic vegetation, or a surface flow pattern on-site; therefore, these gullies are considered to be isolated and, therefore, non-jurisdictional. A former pond is also present on-site but it no longer holds water or exhibits evidence of ponding water. Downstream of the former pond, a former watercourse was only partially visible and did not exhibit evidence of recent flow. No features on-site, including the former pond, watercourse and erosion gullies, appeared to exhibit characteristics (i.e. dominance of hydrophytic vegetation, flow pattern or ordinary high water mark) to indicate that they would be considered jurisdictional wetlands or waters by resource agencies.

ENVIRONMENTAL IMPACTS

Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, the proposed project could have a significant environmental impact on biological resources if it would:

- Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service;

- Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service;

- Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means;

- Interfere substantially with the movement of any native resident or migratory fish and wildlife species or with established native resident or migratory wildlife corridors, or impede the use of a native wildlife nursery site;

- Conflict with an local polices or ordinances protecting biological resources, such as a tree preservation policy or ordinance; or

- Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

Project Details

The project includes the subdivision of the site into two lots and the development of 37 single-family homes. The 37 proposed homes will be comprised of three plan types. Project implementation will additionally involve the construction of vehicle access ways and driveways for the proposed units, and associated infrastructure.

Of the project site's total area of 6.19 acres, building footprints would cover approximately 1.17 acres (or 18.9% of the total project site). An additional area of 0.85 acres (or 14.0% of the project site) would be covered by other forms of impervious surfaces, such as roads, driveways, patios and walkways. A total area of 0.86 acres (or 13.9% of the project site) would be covered with landscaping. In addition, there would be approximately 2.37 acres (or 38.27% of the project site) of undisturbed open space and 0.93 acres (or 17.7% of the project site) of private open space. A homeowners' association would be responsible for the maintenance of the open space.

Project Impacts

The impacts of the Project on biological resources are grouped below into major categories of impacts. The actual impact and its anticipated location on the project site is described in detail within each major category below.

Impact 1: Special-Status Species

Southern California black walnut is considered a special status plant species as it has a threatened rank (S3.2) in the CNDDB. Although this species is considered a List 4 "watch list" species by CNPS, there are very few List 4 plants that meet the definitions of Section 1901, Chapter 10 (Native Plant Protection Act) or Sections 2062 and 2067 (California Endangered Species Act) of the California Fish and Game Code, and few, if any, are eligible for state listing[22]. However, impacts to this species are considered in this analysis – the proposed project would result in the removal of nine (9) Southern California black walnut trees during project development. Therefore, the proposed project may have a substantial adverse effect, either directly or through habitat modifications, on Southern California black walnut, a species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service. Impacts to the southern California black walnut trees are considered potentially significant and mitigation is required. **Mitigation Measure D-1** includes planting replacement trees either on-site or on adjacent project site; maintaining and monitoring the trees; and preserving the land supporting the replacement trees in perpetuity. This mitigation measure would also be in compliance with tree replacement requirements under the Mulholland Scenic Parkway Specific Plan and LAMC Ordinance 177,404. With implementation of **Mitigation Measure D-1,** impacts to southern California black walnut trees would be reduced to a less-than-significant level.

San Diego desert woodrat, a federal and state species of concern, has the potential to occur on-site in the several stick nests observed during site visits. However, the project as designed would avoid the nests observed on-site. Therefore, if any of this species are present on site, the project would avoid the direct impact of nest removal, which could result in potential harm or mortality to individuals or young. The location of the existing stick nests along Mulholland Drive indicate that the individuals that may occupy these nests are highly acclimated to vehicle noise, vibration and human disturbances; however, noise, vibration and incidental disturbance from crew activities due to project construction would be substantially greater and may disrupt breeding or nesting activities. Therefore, the proposed project may have a substantial adverse effect, either directly or through habitat modifications, on the San Diego desert woodrat, a species identified as a candidate, sensitive, or special-status species, and impacts to this species are potentially significant. This impact can be reduced to less-than-significant with the implementation of **Mitigation Measure D-2**. This measure would include avoidance and protection of nests during construction, hand removal of nests outside of the nesting season for nests that cannot be avoided, and project timing to avoid breeding disturbance. The project will have a less-than-significant impact on foraging habitat and territory for the San Diego desert woodrat, if present, as the species' home range is generally less than 0.5 acre, and their movement ranges from 14 to 80 meters per night; therefore, the remaining undisturbed habitat will provide adequate foraging and home range, which is approximately

[22] *California Native Plant Society. 2001. Inventory of Rare and Endangered Plants of California. CNPS, Sixth edition. August 2001.*

equal to their existing foraging territory considering that the existing chain link fence at the base of the slope along Mulholland Drive currently constitutes a barrier between the nests and much of the on-site habitat.

One special status reptile, the coastal western whiptail (federal species of concern), is present on-site; an additional five special status reptiles have a moderate to moderately high potential to occur on-site (San Bernardino ringneck snake [federal species of concern], Coast patch-nosed snake [federal and state species of concern], Silvery legless lizard [federal and state species of concern], San Diego mountain kingsnake [state species of concern], and horned lizard [federal and state species of concern]). Project construction would permanently remove occupied and potential on-site habitat for these species through conversion to residences and paved roadways. Project construction may also result in harm or mortality of individuals due to crushing or burial from site grading. Although a portion of the site will remain as open space following project construction, which would provide reduced but potentially viable habitat for these species, the quality of this habitat may be compromised due to increased noise and human activity in the adjacent development, increased unattended domestic pets (particularly cats) which are known to predate upon reptiles and amphibians, and possible "edge effects" such as an increase in trash, irrigation water and fertilizer. These impacts from the project may be considered potentially significant; however, these impacts can be reduced to a less-than-significant level through the implementation of **Mitigation Measure D-3**. This measure includes surveys to determine the population size and extent of special status reptiles on-site, pre-construction trapping surveys to relocate reptiles from the impact zone, monitoring by an approved biologist during project construction, and protection in perpetuity of on-site habitat where individuals are relocated.

Several special status birds have the potential to occur on-site, including Cooper's hawk (federal species of concern) and Bell's sage sparrow (federal and state species of concern). In addition, other raptors and migratory birds may nest in vegetation on the project site. Impacts to nesting activities of these special status birds, including interruption or cessation of breeding activities, egg laying and incubation, and rearing young, may be considered a significant impact. Vegetation and tree removal during grading may directly remove nests during the breeding season, and additional construction noise, vibration, and crew activities may result in disturbances to nesting and breeding activities. These impacts can be reduced to a less-than-significant level through the implementation of **Mitigation Measure D-4**. This measure includes requiring removal of vegetation outside of the breeding and nesting season, or pre-construction surveys and buffers to avoid nests if vegetation removal occurs during the breeding season.

Impact 2: Sensitive Natural Communities

One sensitive plant community, purple needlegrass grassland, is present on-site. The majority of this community will be impacted due to removal or degradation during project construction from grading on-site and along San Feliciano Drive, and from home and road installation. Any remaining habitat following project construction may be indirectly impacted due to invasion from installed landscape plants or increases in irrigation or fertilizer from new residential lawn or landscaping maintenance. Therefore,

impacts to purple needlegrass grassland is potentially significant and mitigation is required. **Mitigation Measure D-5** includes planting the undeveloped portion of the graded habitat along San Feliciano Drive with purple needlegrass and other native grasses and forbs, maintenance and protection of the site, and prohibition of highly invasive plants in landscaped areas on-site (in accordance with requirements under the Mulholland Scenic Parkway Specific Plan). With implementation of **Mitigation Measure D-5** impacts to purple needlegrass grassland would be reduced to a less-than-significant level.

No other sensitive plant communities occur on-site; however, impacts to native trees are addressed under "Impact 5: Conformance with Local Policies and Ordinances" below.

Impact 3: Jurisdictional Resources

No wetland or water features that are considered potentially jurisdictional are present on-site; therefore, the project will not result in significant impacts to jurisdictional resources. Relict features such as the former pond and former blue line stream no longer exhibit evidence of ponding (i.e., ordinary high water mark, algal mats or sediment deposits), flow (i.e., ordinary high water mark, scouring, debris pattern or "wrack" line), or aquatic life (i.e., aquatic invertebrates or vertebrates, riparian or hydrophytic vegetation) that would bring them under the regulatory jurisdiction of the Corps, CDFG or RWQCB. Although several erosional gullies have developed along the steep slope at the southwestern corner of the site due to runoff from Mulholland Drive, these features appear to be highly ephemeral (i.e., only flowing after storm events) and do not appear to connect to any jurisdictional features offsite, thus making these features non-jurisdictional. However, as these features are located in an area that will not be graded or otherwise affected during project implementation or operation, the erosional gullies will not be filled, removed or otherwise adversely impacted by the project. Impacts to jurisdictional resources would be less than significant.

Impact 4: Wildlife Movement and Habitat Connectivity

Wildlife movement corridors, also called dispersal corridors, habitat or landscape linkages, and connectivity zones, are linear features whose primary wildlife function is to connect at least two significant habitat areas or larger core areas [23,24]. Wildlife corridors generally focus on mammals and reptiles, as birds can fly over developed areas between habitat patches and amphibians and aquatic wildlife rely on waterways for dispersal between habitat patches. These areas are generally bordered by human development and often consist of canyon bottoms, watercourses, and other remnant habitats that have remained undeveloped. Corridors help to prevent habitat fragmentation which may result in the loss

[23] *2000. Missing Linkages: Restoring Connectivity to the California Landscape. http://www.calwild.org/resources/pubs/linkages/index.htm*

[24] *Beier, P. and S. Loe. 1992. A checklist for evaluating impacts to wildlife movement corridors. Wildlife Society Bulletin 20:434-440. Cited in: Principles of Wildlife Corridor Design, Monica Bond, Center for Biological Diversity, October 2003, http://www.biologicaldiversity.org/swcbd/Programs/sprawl/wild-corridors.pdf*

of corridors also enhance wildlife reproductive success by promoting the exchange of genetic material between subpopulations of a species, allowing for evolutionary adaptations.

Although mammals and reptiles may currently cross over Mulholland Drive between the project site and the relatively natural habitat areas on the school and park property to the south of Mulholland Drive, the project site does not function as part of a true wildlife corridor since wildlife dispersal across the site is currently compromised by vehicle traffic on Mulholland Drive. In addition, the site does not act to connect two significant or large core habitat areas; rather, the site is a relatively small habitat island surrounded almost completely by suburban development.

Given that much of the project site is nearly surrounded by suburban development and a busy street (Mulholland Drive), the project site provides no linkage wildlife movement or nursery use. In addition, no major migratory routes for mule deer or other important migratory animals have been identified on or adjacent to the site. Therefore, no significant impacts to wildlife movement, migration corridors, or nursery sites will occur from the Project.

Impact 5: Conformance with Local Policies and Ordinances

The proposed project would preserve 160 mature trees, including 144 oaks, and require the removal of 37 trees, including nine (9) oaks and nine (9) black walnuts on the project site. Section 46.00 et seq. of the Los Angeles Municipal Code (LAMC), and Los Angeles City Ordinance No. 177,404 set forth regulations for the preservation of certain protected species trees in the City and further provide that a protected species tree cannot be removed or relocated without first obtaining a permit from the Board of Public Works. In addition, the proposed project site is within the Mulholland Scenic Parkway Specific Plan (MSPSP) and is thus subject to the regulations and requirements of the MSPSP. The MSPSP calls for the preservation of as many mature trees on a project site as possible and requires that trees that are removed be replaced as follows: a minimum of two oak trees (minimum of 36-inch box size) are to be planted for each one that is removed, any native tree removed must be replaced at a two for one ratio (minimum of 15 gallon size) with individuals of the same tree type, and any non-native tree removed must be replaced at a one for one ratio (minimum of 15 gallon size). Further, as required by Los Angeles City Ordinance No. 170,978, a comprehensive landscaping program would be implemented for the proposed project. Therefore, while impacts to protected species trees, native trees, and other mature non-native trees on the project site from project construction may be considered potentially significant; these impacts would be reduced to a less-than-significant level through the implementation of **Mitigation Measure D-6** and in accordance with requirements under the MSPSP and the LAMC.

Impact 6: Conformance with Adopted Habitat Conservation Plans, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

No Habitat Conservation Plans, Natural Community Conservation Plans or other such local or regional plans have been adopted that encompass the project site; therefore, no impacts are anticipated and no mitigation is considered necessary.

CUMULATIVE IMPACTS

Based on a review of the related projects in the vicinity of the project site (Table IV-3) and aerial photographs, few of these projects are likely to have significant impacts to biological resources due to their small size or location in existing developed areas. With respect to the biological impacts identified under the proposed project described above, only a few related projects in the area (#22-25 and 27) also have the potential to impact nesting birds and protected trees, and possibly special status reptiles, but at a relatively lower level given their small project size. Related Project No. 26 is located in an existing shopping center and would not be expected to have the potential to impact nesting birds, protected trees or special status reptiles. However, with the measures proposed to mitigate these impacts under the proposed project, and given the small size of the related projects (0.8-acre or less) as compared to the proposed project, and their distance from the proposed project (at least 2 miles away), these impacts are not anticipated to be cumulatively considerable or significantly adverse when evaluated with other related projects in the vicinity.

MITIGATION MEASURES

The following mitigation measures are required to reduce potential impacts on special-status species to less-than-significant levels. Subsequent permitting processes with resource agencies could result in additional mitigation beyond that required by the City of Los Angeles in the CEQA process. Any additional mitigation required by these agencies would be incorporated as a condition of their permit authorization.

D-1 The following measures shall be implemented to protect the two (2) Southern California walnut trees that will be preserved on-site, and to replace the nine (9) walnut trees that will be removed during project construction.

- Two (2) Southern California black walnut trees that will be preserved on-site shall be fenced with a temporary chainlink (or similar) protective fence at their driplines (or at the location of approved encroachment) prior to the start of any onsite grading. This fencing shall remain intact until the City of Los Angeles' Planning Department or Street Tree Division, Bureau of Street Maintenance allows it to be removed or relocated

  Construction contract specifications shall require that no stockpiled soils, building material, parked equipment, or vehicles shall be stored within the fenced dripline areas. (Refer to Mitigation Measure D-6 for further protective measures for trees to be preserved on-site.)

- The nine (9) Southern California black walnut trees to be removed will be replaced in accordance with the Mulholland Scenic Parkway Specific Plan and Los Angeles City Ordinance 177,404, which requires replacement of protected species trees with 15 gallon individuals of the same tree type at a 2:1 ratio. The replacement trees should be individuals grown from seeds collected in the vicinity of the project site and/or the Santa Monica Mountains to retain regional genetic character.

In addition, an automatic irrigation system and fire resistant corridor shall be implemented to maintain and sustain the trees in perpetuity. The replacement trees shall be monitored annually for health and shall be replaced in the event of inadvertent mortality. (Refer to Mitigation Measure D-6 for further measures regarding trees to be removed and replaced.)

D-2 The following measures shall be implemented to avoid and minimize potential impacts to San Diego desert woodrat which has the potential to occur on-site:

- In order to protect the existing woodrat nests and to prevent impacts to breeding activities from construction-related disturbances such as noise and vibration, vegetation and grading activities within 100 feet of the existing nests shall be initiated prior to the breeding season for the San Diego desert woodrat (October through mid-July) and shall continue regularly throughout the breeding season; this will prevent woodrats from breeding during construction activities for that year, which will eliminate the possibility of abandonment of young if construction is initiated once breeding has already begun. In addition, the existing nests on-site shall be identified on all construction maps and flagged to aid in identification and avoidance by construction crews. A qualified biological monitor shall periodically evaluate the nests to ensure that they are not physically impacted during construction activities.

- If additional woodrat nests are found within the construction zone that will require removal, that nest should be dismantled by hand by a qualified biologist prior to grading and vegetation removal activities. The nest dismantling shall occur outside the breeding/weaning season (breeding occurs from October-May and weaning may occur through mid-July) and shall be conducted so that the nest material is removed beginning on the construction side of the nest, which will allow for any woodrats in the nest to escape into the adjacent remaining habitat. Care shall be taken during nest dismantling to ensure that any special status reptiles which may be cohabitating in the nest are not harmed; if possible, any special status reptiles encountered during nest dismantling shall be captured and relocated by a qualified biologist in accordance with Mitigation Measure D-3.

D-3 The following measures shall be implemented to avoid and minimize potential impacts to special status reptiles during and following project construction:

- Conduct field surveys to determine the presence or absence of special status reptiles on the project site, and their approximate population size and distribution if present. Surveys shall be conducted by a qualified biologist according to standard methods of surveying for reptiles. A report shall be submitted to the City, CDFG and USFWS documenting the surveys methods and results, including number and location of individuals observed and estimated population size.

- A plan shall be prepared by a qualified biologist to trap special status reptile individuals on-site prior to and during ground-disturbing construction activities and release them to nearby suitable habitat that will be protected in perpetuity; this may include preserved habitat areas on-site or

public lands in the vicinity if approved through a Memorandum of Understanding with the landholding agency (i.e. the City for the adjacent DWP Girard Reservoir property or Alizondo Drive Park, or the Santa Monica Mountains National Recreation Area). This plan shall be submitted to and approved by the City, CDFG and USFWS prior to implementation and prior to vegetation removal or ground disturbance. A follow-up report documenting trapping and relocation methods and results shall also be submitted to the City, CDFG and USFWS following construction.

- If special status reptiles are relocated to preserved habitat on-site, this area shall be protected during project construction using silt fencing or other fencing as approved by a qualified biologist. The protective fencing shall be installed prior to any ground disturbance or vegetation removal, and shall be maintained during all phases of project construction; fence maintenance shall be regularly monitored by a qualified biologist. No construction-related activities shall be allowed in the protected habitat, including storage of materials or equipment, or trespass by construction crew members. This preserved on-site habitat shall also be protected in perpetuity from the adjacent constructed residential development by appropriate permanent fencing as recommended and approved in the relocation plan described above. In addition, an educational pamphlet shall be prepared and distributed to all residents within the new development informing them of the harm that domestic outdoor cats have upon wildlife, and strongly discouraging residents from allowing their cats outdoors unattended.

- A qualified biologist shall be present during vegetation removal and grading activities to monitor activities and relocate any special status reptiles in accordance with the above plan in order to avoid impacts to any individuals remaining on-site following pre-construction trapping and relocation activities.

D-4 To avoid impacting nesting birds, special status birds and/or raptors, one of the following shall be implemented:

- Conduct vegetation removal and other ground disturbance activities associated with construction during September through February, when birds are not nesting. If feasible, initiate vegetation clearing and grading activities prior to the breeding season (March through July and keep disturbance activities constant throughout the spring to prevent birds from establishing nests in surrounding habitat in order to avoid abandonment of eggs or young if nesting establishes prior to construction activities;

  OR

- Conduct pre-construction surveys for nesting birds if construction is to take place during the nesting season. A qualified wildlife biologist shall conduct a pre-construction raptor survey no more than 30 days prior to initiation of grading to provide confirmation on presence or absence of active nests in the vicinity (at least 300 feet around the project site). If active nests are

encountered, species-specific measures shall be prepared by a qualified biologist in consultation with the CDFG and implemented to prevent abandonment of the active nest. At a minimum, grading in the vicinity of the nest shall be deferred until the young birds have fledged. A minimum exclusion buffer of 50 feet for songbird nests, 100 feet for specials status songbird nests, and 200 to 500 feet for raptor nests, shall be maintained during construction depending on the species and location. The perimeter of the nest-setback zone shall be fenced or adequately demarcated with staked flagging at 20-foot intervals, and construction personnel and activities restricted from the area. A survey report by the qualified biologist verifying that the young have fledged shall be submitted to the City, CDFG and USFWS prior to initiation of grading in the nest-setback zone. The qualified biologist shall serve as a construction monitor during those periods when construction activities will occur near active nest areas to ensure that no inadvertent impacts on these nests will occur.

D-5 Following the project grading activities, including regrading of area along San Feliciano Drive, the undeveloped areas along San Feliciano Drive shall be landscaped with a native plant palette to include purple needlegrass and other native grasses and herbaceous plants. These areas shall be seeded or planted (with grass plugs) during the November or December immediately following the completion of grading to take advantage of any winter rains; supplementary irrigation shall be installed to augment winter rains as necessary. Seeds or plants installed should be from material salvaged from the impact area prior to grading, and augmented with plant material collected from the project area vicinity (i.e.; the Santa Monica Mountains area). These areas shall not be planted with other landscaping plants or any non-native plants, including those prohibited by Mulholland Scenic Parkway Specific Plan Section 10(B). Maintenance shall include removal of weeds and non-native exotic plants as needed, including periodic mowing for fire or weed control.

D-6 The following mitigation measures shall be implemented to protect and preserve the 144 coast live oak (Quercus agrifolia) trees and 17 other native and non-native trees that will be maintained on-site, and to mitigate for the loss of nine (9) coast live oaks, nine (9) Southern California black walnuts, six (6) native trees and thirteen (13) non-native trees that will be removed during project construction.

- Prior to the issuance of a grading permit or building permit, the project applicant shall submit a tree report and landscape plan prepared by a Municipal Code-designated tree expert as designated by City of Los Angeles Ordinance No. 177,404, for approval by the Mulholland Scenic Corridor Specific Plan Design Review Board, the City of Los Angeles' Planning Department and the Urban Forestry Division of the Bureau of Street Services.

- The plan shall contain measures recommended by the tree expert for the preservation of as many trees as possible. Replacement trees shall be provided as follows: a minimum of two oak trees (minimum of 36-inch box size) are to be planted for each one that is removed, any native tree removed must be replaced at a two for one ratio (minimum of 15 gallon size) with individuals of

the same tree type, and any non-native tree removed must be replaced at a one for one ratio (minimum of 15 gallon size). In addition, replacement trees must be provided to the satisfaction of the Street Tree Division of the Bureau of Street Services and the Advisory Agency.

- The project applicant shall post a cash bond or other assurances acceptable to the Bureau of Engineering in consultation with the Urban Forestry Division and the Advisory Agency guaranteeing the survival of trees required to be maintained, replaced or relocated in such a fashion as to assure the existence of continuously living trees for a minimum of three (3) years from the date that the bond is posted or from the date such trees are replaced or relocated, whichever is longer. Any change of ownership shall require that the new owner post a new tree bond to the satisfaction of the Bureau of Engineering. Subsequently the original owner's bond may be exonerated.

- The City Engineer shall use the provisions of Section 17.08 as its procedural guide in satisfaction of said bond requirements and processing. Any bond required shall be in a sum estimated by the City Engineer to be equal to the dollar value of the replacement tree or of the tree which is to be relocated. In determining value for these purposes, the City Engineer shall consult with the Advisory Agency and shall also consult the evaluation of trees guidelines approved and adopted for professional plantsmen by the International Society of Arboriculture, the American Society of Consulting Arborists, the National Arborists Association and the American Association of Nurserymen, and other available, local information, or guidelines.

- Prior to the exoneration of the bond, the owner of the project site shall provide evidence satisfactory to the City Engineer and Urban Forestry Division that the trees were properly replaced, the date of the replacement and the survival of the replacement trees for a period of three years.

- The project applicant shall provide a pamphlet regarding proper procedures oak tree maintenance to the homeowners' association and to purchasers of individual homes within the proposed project. The project CC&Rs shall require the homeowners' association to provide the oak tree pamphlet to subsequent home buyers.

- Mature trees to be retained shall be examined by a qualified arborist prior to the start of construction. Some of the project's saved native oak trees are in need of minor dead wood removal. No major structural pruning shall be permitted. A qualified arborist shall complete all dead wood removal and/or pruning.

- Mature trees to be retained and protected in place during construction shall be fenced with a temporary chainlink (or similar) protective fence at their driplines (or at the location of approved encroachment) prior to the start of any onsite grading. This fencing shall remain intact until the

City of Los Angeles' Planning Department or Street Tree Division, Bureau of Street Maintenance allows it to be removed or relocated.

- Construction contract specifications shall require that no stockpiled soils, building material, parked equipment, or vehicles shall be stored within the fenced dripline areas.

- Construction contract specifications shall include provision for temporary irrigation/watering and feeding of these trees, as recommended by a qualified arborist.

- All footing excavations within the driplines shall be dug by hand work only, to a maximum depth of 5' (or to a depth that CAL/OSHA, OSHA or local codes allow). Any excavation below the "approved" depth may be done with acceptable machinery. All footings within the saved tree driplines shall be of "post type" rather than of "continuous type" to lessen potential root damage.

- No other onsite trees to be retained shall be encroached upon within their driplines other than what is being requested.

- No "over-excavation' outside of any cut and/or fill slopes ("tops" or "toes") for the purposed construction shall occur within the dripline of any onsite trees to be retained, unless required by the project's structural engineer.

- No landscape, irrigation lines, utility lines and/or grade changes shall be designed and/or installed within the dripline of any trees to be retained, unless approved by the City of Los Angeles' Planning Department or Street Tree Division, Bureau of Street Maintenance.

- The "bare" areas within the driplines of any onsite or "over-hanging" oak trees or other trees to be retained, or within 50' of approved grading/construction near native oak or other trees to be retained, shall be covered with an insect and disease free organic mulch (minimum depth of 2" thick and no closer than 6" from their trunks and extending to approximately ten feet outside the dripline).

- All work to this project's protected species trees shall be in accordance with the City of Los Angeles' Protected Tree Ordinance, the Mulholland Scenic Parkway Specific Plan and LAMC 46.00 et. seq.

- Examination of the trees to be retained shall be performed monthly by a qualified arborist to insure that they are being adequately protected and maintained. Prior to the completion of the proposed project, a qualified arborist shall certify in a "letter of compliance" that all concerned tree policies have been adhered to.

- Copies of the proposed project's Horticultural Tree Report, the City's Protected Tree ordinance, and the Mulholland Scenic Corridor Specific Plan shall be maintained onsite during all project construction.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Biological resource impacts would be reduced to less-than-significant levels after implementation of the mitigation measures.