



Friends of Griffith Park

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friendsofgriffithpark.org

July 10, 2017

Re: ZA 2017-838 ZAA-ZAD, 6443 & 6459 Innsdale Drive

To all parties concerned,

Friends of Griffith Park is opposed to granting any relief from existing City code which, in any manner, may increase the risk of adverse impacts on wildlife or habitat in or near Griffith Park. We also request that a full Environmental Impact Report be prepared so alternatives to the current proposed project may be considered, and adverse impacts may be mitigated. Particular detail in preparation of the biological assessment should be taken to include not only the flora and fauna on the property itself, but also impacts downstream and along wildlife corridors.

The major concern regarding the proposed development surrounds the long undeveloped trail leading to a ravine where an extraordinary volume of fill dirt may be deposited onto chaparral /shrub habitat. On or immediately downslope of the location of the dumped dirt lies a "blue line" stream with intermittent flow, per City and USGS mapping. The stream provides for a rich riparian habitat, laden with large protected Coast Live Oaks and California Sycamores. Typical riparian flora is present, including similar flora seen at other Griffith Park canyons.

This habitat is particularly attractive for movement of wildlife, including mountain lion P-22, present in this area since February 2012 and initially cage-trapped for collar-fitting near this location (DWP Parcel C) in early March 2012. We consider this area one of the most important, pristine, ecological jewels in the Griffith Park area, not only because it is untouched, but also because it is remote to most human impact. P-22 is present in the proposed development vicinity regularly, including daytime hunkering.

Over the last ten years, various scientific surveys in Griffith Park have been conducted, collectively known as Griffith Park Natural History Survey, which Friends of Griffith Park has supported with funding and volunteer resources. The surveys have confirmed that the general park area contains highly biodiverse and healthy plant communities - chaparral, scrub, oak woodland, and oak-sycamore riparian zones. We know that Griffith Park supports nearly half the entire flora (species) known from the Santa Monica Mountains, and is a major storehouse of regionally- and locally-rare species, such as Humboldt lily and Plummer's mariposa lily.

During the Rare Plant Survey, more special-species status plants were confirmed than expected, and the ratio of indigenous species versus non-natives was higher than expected considering the park's urban setting. It was concluded that no areas of the park are unimportant for rare plants. However, the western reaches of the park, in the general area of this proposed development, have quite a high incidence of six to eight rare/targeted plant species.

Various reptiles and amphibians of concern, although pressured, are still present in the Griffith Park area. These include coast horned lizard, San Bernardino ring-necked snake, arboreal salamander and coastal whiptail lizard, among others. A variety of other special reptile and amphibian species which were documented in past decades have not been confirmed in recent years, but hope persists. These include the two-striped garter snake, side-blotched lizard, and garden slender-salamander. The coast horned lizard now only persists in the western reach of the park, in the areas surrounding this development, and no further east than just beyond the Mt. Lee area.

In addition to the over five years of a mountain lion's presence in the Griffith Park area, bobcats are common in western portion of Griffith Park as well as western gray foxes. The habitat on this land and associated land is critical space for these special species.

It is important that the health of our great urban wilderness in the heart of our huge city continues into the future. Residential development must be held in check with existing hillside building codes and be compatible and contextual with ecological health, as well as existing homes in the area.

Sincerely,



Gerry Hans
Vice President, Science and Conservation



Marian Dodge
President