STATE OF CALIFORNIA–THE NATURAL RESOURCES AGENCY EDMUND G. BROWN, JR., *Governor*

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BY:_____

Ms. Connie Chung
County of Los Angeles
Department of Regional Planning
General Plan Development Section
320 West Temple Street
Los Angeles, California 90012

Comments on Draft Environmental Impact Report (SCH No. 2011081042) for the Los Angeles County General Plan Update

Dear Ms. Chung:

The Conservancy offers the following comments regarding the Draft Environmental Impact Report (DEIR) for the proposed General Plan Update. The Conservancy is particularly concerned with how biological resources will be assessed on a project-specific level.

The DEIR for the proposed General Plan Update includes Mitigation Measure BIO-1, which requires an assessment of biological resources on a project-specific level. Mitigation Measure BIO-1 states in part:

> "A biological resources assessment report shall be prepared to characterize the biological resources on-site, analyze project-specific impacts to biological resources, and propose appropriate mitigation measures to offset those impacts."

Based on the above provision of Mitigation Measure BIO-1, a thorough project-specific analysis of constraints on-site is not included as part of the biological resources assessment report. To provide adequate mitigation potential, the biological resources assessment report must encourage the avoidance of impacts to biological resources based on the analysis of site constraints and provide detailed, scaled recommendations to avoid such impacts.

The Conservancy recommends that the biological resources assessment report include a distinct biological constraints analysis section that identifies, on detailed figures, which area of a project site and any adjacent parklands should be free of direct impacts, indirect impacts such as lighting and wildlife impermeable fencing, and fuel modification impacts.

The sum of the biological resources and biological constraints assessment report must fully disclose both the extent and severity of the 200-foot wide fuel modification zones, including any overlap on public lands. Fuel modification zones often include irrigation. All analyses must address how such irrigation will collectively increase the range of undesired non-native Argentinian ants (*Linepithema humile*).

It is critical that the biological constraints analysis section also address direct and indirect impacts to adjacent parklands and all public lands. Private gains (e.g., a better house site) should not trump protection of public resource lands acquired with public dollars.

We appreciate your consideration of these comments. If you have any questions, please contact Paul Edelman, Deputy Director for Natural Resources and Planning, by phone at (310) 589-3200, extension 128, or by email at edelman@smmc.ca.gov.

Sincerely,

Linda Parks

LINDA PARKS
Chairperson