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October 20, 2025

Board of Zoning Appeals
175 N. Garfield Ave., 2nd Floor
Pasadena, CA 91101

Email: amartinez@cityofpasadena.net

Subject: Response to comments from the Arroyos & Foothills Conservancy on the proposed residential project at 1530 Scenic Drive, City of Pasadena, Los Angeles County, California

Dear Members of the Board:

This letter provides a response to comments from the Arroyos & Foothills Conservancy (hereafter, "AFC Letter", dated September 9, 2025) on the proposed residential project at 1530 Scenic Drive, City of Pasadena, Los Angeles County, California (hereafter, "Project Site"). As described herein, the AFC Letter significantly overstates biological conditions on the Project Site, including its importance to wildlife movement.

Project Site Location

The Project is proposed construction on approximately 0.69 acres of land located at 1530 Scenic Drive in the City of Pasadena, Los Angeles County, California. On the Public Land Survey System, the Project Site is located within the San Rafael Land Grant of the US Geological Survey's 7.5-minute *Pasadena* quadrangle. The location of the Project Site is shown in **Figure 1**.

The nearest open space in the California Protected Areas Database (CPAD) is Linda Vista Park managed by the City of Pasadena. It is located approximately 0.3 miles to the southeast. The nearest easement in the California Conservation Easement Database is located approximately 4.3 miles to the west.

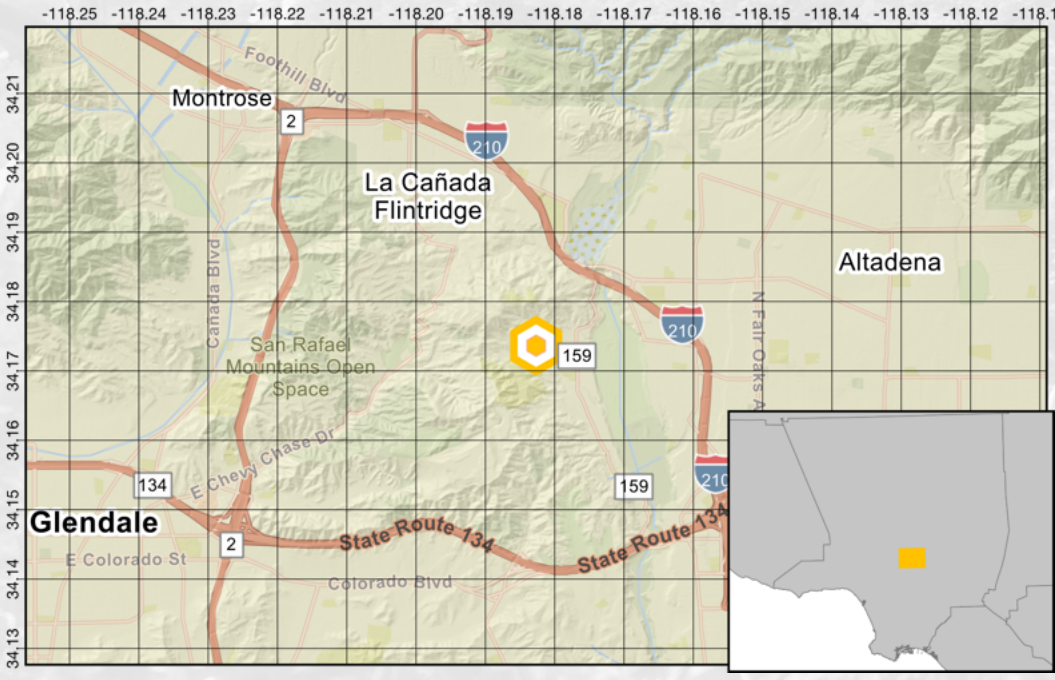


Figure 1. Project Site Location

Background

Bargas Environmental Consulting, then a statewide multi-disciplinary environmental consulting firm based in Sacramento, was contracted by TOLO Architecture to complete a letter discussing the potential biological effects of the construction of a single-family residence on the Project Site.

That report was completed and provided to TOLO Architecture on October 10, 2022 (hereafter, "Bargas report"). The Bargas Report was authored by Allison Ferkovich (a Bargas biologist based in Sacramento) after a site visit conducted by the author of this letter (England) and biologist Jane Gao, who was being trained on England's preferred methods for documenting biological conditions. England was the Director of Biological Resources for Bargas.

England resigned from Bargas in March 2023 to start England|Ecology. The majority of the biological staff left soon thereafter, and Bargas was subsumed into Helix Environmental Planning in mid-2025.

The majority of England|Ecology's consulting work is in single-family residential development. Because of England's ties to the Project, England|Ecology was contracted by TOLO Architecture to respond to the AFC Letter on October 17, 2025. A new site visit was not conducted for the preparation of this letter, as it was deemed unnecessary based on existing site documentation and its location in a long-developed residential area.

Discussion

Existing Conditions

The Project Site is located within a long-developed residential neighborhood. It is bounded on either side by residences built in the 1950s (see attached **Site Map** and following discussion). It is unclear what prior land uses occurred on the Project Site, but much of the property appears to be at a non-natural grade with a series of retaining walls (see **Figure 2**). Historic conditions are discussed in the next section.

Figure 2. Google Street View image of the Project Site.

Historic Conditions

Historic conditions on a site are important to understanding observable conditions in the present day. To that end, much can be surmised by viewing historic aerial photography, such as that available on the UCSB FrameFinder[1] site.

Figure 3. 1938 aerial. The Project Site is highlighted with an orange box.

Figure 4. 1944 aerial. The Project Site is highlighted with an orange box.

[1] https://mil.library.ucsb.edu/ap_indexes/FrameFinder/

Figure 5. 1960 aerial. The Project Site is highlighted with an orange box.

As shown in **Figure 3** and **Figure 4**, modern Scenic Drive and Vista Lane had been fully constructed by 1938. Residential development is present in many areas of these images, while other areas are clearly agricultural. While Scenic Drive had not yet been developed as residential in 1944, both the 1938 and 1944 images show grassland as the primary vegetative cover in much of the area. No trees were present on the Project Site or adjacent properties. It is unclear if they were present prior to anthropogenic land uses, or later planted as part of nationwide tree planting efforts that were common decades ago.

Figure 5 shows conditions in 1960. By that year, the area had been developed to the extent that it is today. Much of the Project Site appears to show land disturbance.

Wildlife Movement

The AFC Letter focuses primarily on an assertion that the Project Site is important to wildlife movement. Such assertions are commonly made in opposition to single-parcel developments by nonprofit and quasi-governmental land management agencies (even on fully urban projects), primarily because it is an issue currently in the forefront of environmental discourse, it gets public attention, and most members of the general public don't understand the issue and, thus, equate the presence of an animal in an area with "movement". Further, the issue is rarely studied long-term at the level of a single parcel because of time and monetary constraints. Regardless, for most such small projects, such studies are entirely unnecessary.

To that end, the AFC Letter makes a number of misrepresentations and overstatements, which will be highlighted here:

- On page 1, the author states that the Project Site is "adjacent Cottonwood Canyon Preserve". This is also referenced later in the letter. This statement uses an extremely broad definition of "adjacent", as the Cottonwood Canyon Preserve is located approximately 0.5 miles northeast of the Project Site, with residential development and significant terrain in-between (**Figure 6**).

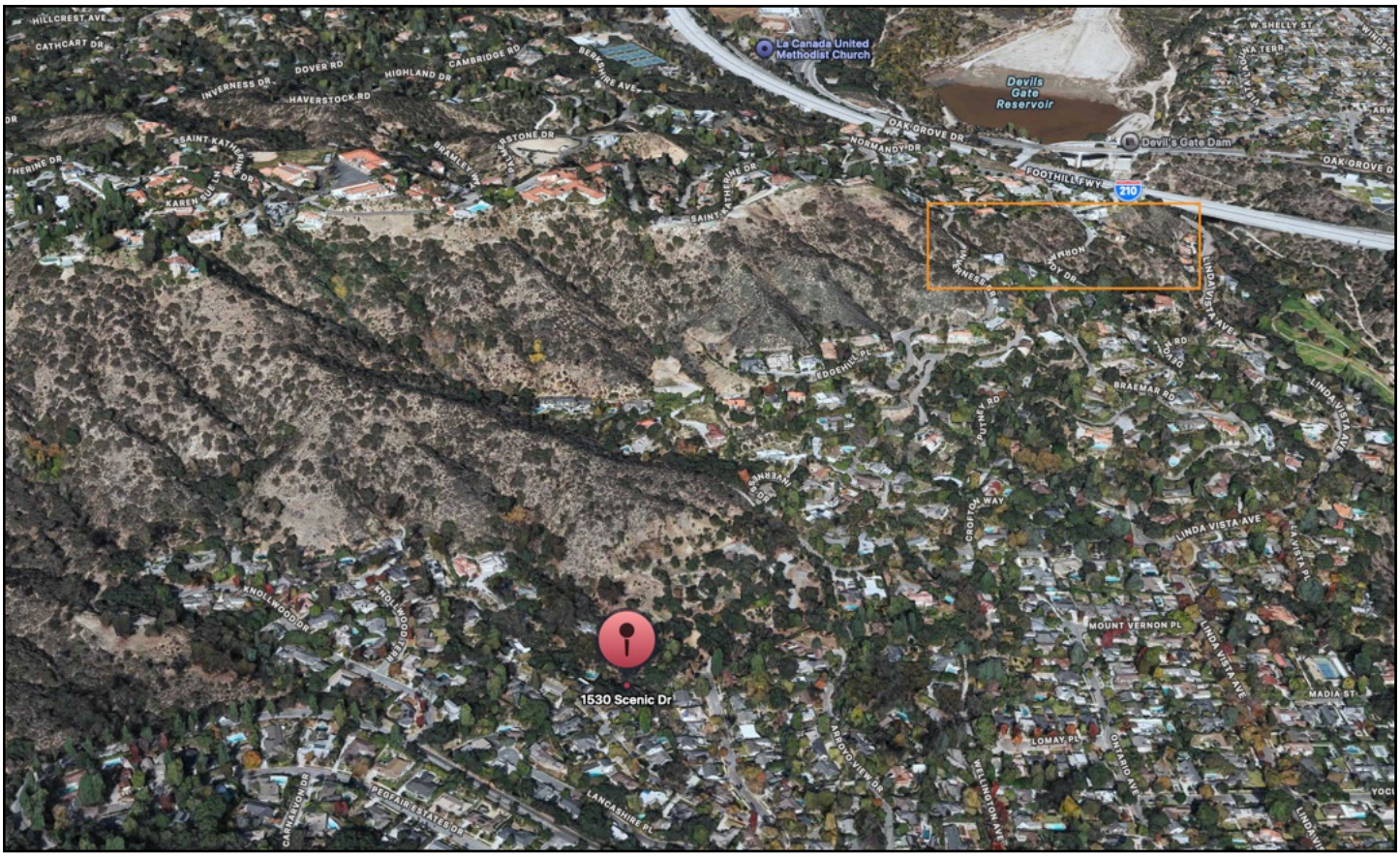


Figure 6. Three-dimensional view from Apple Maps showing the location of the Project Site relative to Cottonwood Canyon Preserve.

- On page 1, the author asserts the importance of the Project Site to wildlife movement, citing camera footage of a Black Bear and a Bobcat at 1560 Scenic Drive. The presence of such wildlife in an area is not an indicator of a movement corridor. Black Bears are regularly present in residential neighborhoods in the foothills, sometimes even denning under patios. Bobcats are more widespread. They have occurred multiple times at this author's residence in Mt. Washington, deep in the heart of urban northeast Los Angeles, and are regularly reported on iNaturalist. This is mentioned again on Page 2 of the AFC Letter, with the author stating that the Black Bear was "traversing Scenic Drive in the *immediate* vicinity of the project site". Immediate vicinity is not *on*, and the bear was on the road. It is almost certain that Black Bears will still be within the neighborhood once the Project Site is developed.

- On page 2, the author states "in its 2018 comments to the City of Pasadena regarding the ArtCenter Master Plan FEIR, CDFW states that any development that reduces or fragments habitat in this area should be considered significant under CEQA." Unlike the Project Site, the Hillside Campus of the ArtCenter College of Design is located squarely in the center of the hills. It is a large facility that is surrounded on all sides by undeveloped open space. There is no comparison between the two properties. Further, the author oversimplified CDFW's comments and broadly generalized them. Specifically, CDFW stated "CDFW recommends that any activity that could result in the reduction, fragmentation or other degradation of habitat value within the *habitat core* be considered significant under CEQA." The Project Site is not located within the habitat core.

- On page 2, the author cites "inadequate biological review". Given the disturbed nature of the Project Site, historic disturbance, and surrounding adjacent development, it is the opinion of England|Ecology that the level of biological review provided by the Bargas Report is sufficient.

- The AFC Letter includes a map. This map clearly shows the Project Site is not adjacent to the "AFC Critical Wildlife Passage Area". The manual addition of an arrow indicating "Possible Wildlife Movement", does not change this fact. The Project Site is located in an otherwise developed residential neighborhood. Development of the Project Site could not feasibly impact wildlife movement corridors.

Summary

The Project Site is surrounded by development, including developed parcels that are immediately adjacent. As such, the proposed Project, while removing some trees (which may have been planted), is simply an infill project. While wildlife could, theoretically, move through the Project Site with limited interference, it cannot be part of a wildlife movement corridor as there is no habitat south of the Project Site to connect to due to urbanization. Any wildlife moving through the site would simply arrive at a roadway and houses. The Project Site could only comprise a portion of a wildlife movement corridor if many residential properties in the area were purchased, the residences removed, and the vegetation restored, creating a new habitat block to the south.

Thank you for providing England|Ecology with the opportunity to work on this project. If you have any questions, comments, or concerns, please reach out to me at (213) 304-1826 or marcus@mcengland.com.

Regards,

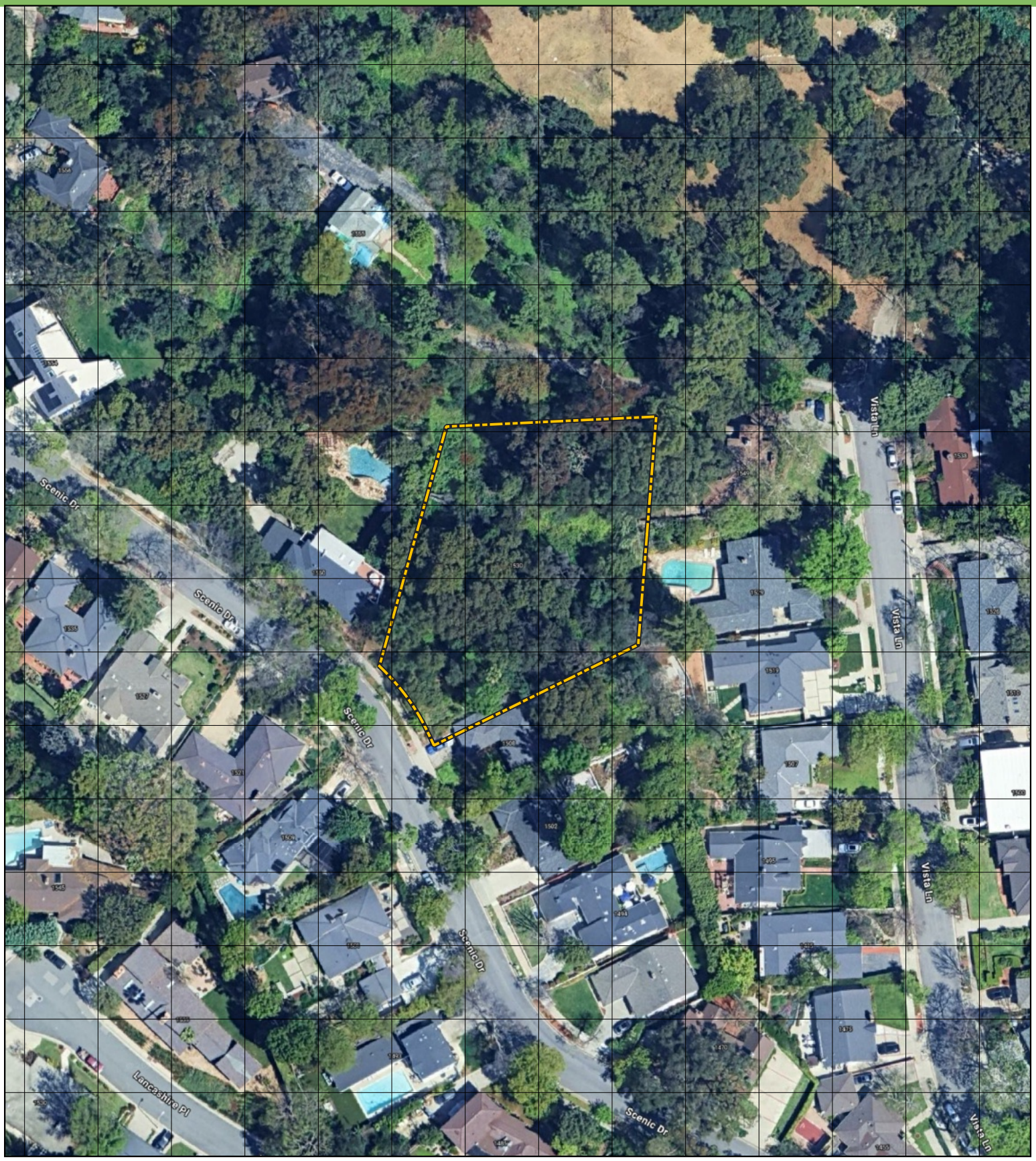
Marcus C. England
Principal Biologist
England|Ecology, LLC

Attachments:

- Site Map
- Resume

Site Map

1530 Scenic Drive



Project Site Boundary

Reference Grid Overlay: 50 feet. Coordinate System: EPSG 3310.
Base Map: Google. Map Scale: 1:1050
Note: If trees are depicted, this exhibit is not intended as a substitute for an arborist report.

Marcus C. England
Principal Biologist

Marcus C. England offers over two decades of experience, with expertise in avian biology, population ecology, project permitting, technical writing, and GIS and project experience in all industries.

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Summary

Marcus C. England is an experienced principal biologist with expertise in avian biology, population ecology, project permitting, technical writing, geographic information systems, and database management. He has led teams on large and complex projects in all industries across the western United States. He has a recovery permit to conduct surveys for California Gnatcatcher, Southwestern Willow Flycatcher, and Yellow-billed Cuckoo and has extensive experience conducting protocol surveys for Least Bell's Vireo, Burrowing Owl, Swainson's Hawk, and Desert Tortoise. England has a thorough knowledge of the California Environmental Quality Act (CEQA), National Environmental Policy Act (NEPA) and Federal Endangered Species Act (FESA) and how these state and federal policies, as well as local land use and environmental policies, apply to the project permitting process. England has written biological resources assessments and biological assessments for some of the largest development projects in the state of California, including projects in Sacramento, Kern, Ventura, Los Angeles, Orange, San Bernardino, Riverside, and San Diego counties and has successfully supported project permitting under an array of regional habitat conservation plans statewide. He has also written due diligence documents for large projects in northern California, Arizona, New Mexico and Nevada. He currently sits on the Science Advisor Panel for the Clark County (Nevada) Multiple Species Habitat Conservation Plan.

Employment History

Independent Consulting Biologist
dba England|Ecology (now England|Ecology, LLC)
Jan 2010 - Jun 2011, Oct 2016 - Mar 2020, Mar 2023 - Present — Los Angeles, CA

- Author proposals, respond to RFP needs for teaming partners
- Conduct all aspects of fieldwork, data management, report writing, mapping
- Business planning, marketing, relationship development

Director of Biological Resources
Bargas Environmental Consulting
Mar 2020 - Mar 2023 — Sacramento, CA

- Corporate leader, department head, and project manager
- Conduct all aspects of fieldwork, data management, report writing, mapping

Vice President
Bloom Biological
Jun 2011 - Oct 2016 — Santa Ana, CA

- Lead development of corporate business strategy, obtain new work contracts
- Manage staff and biological data, conduct fieldwork, author reports, mapping

Director of Biological Services
Natural Resource Consultants
Jun 2003 - Dec 2009 — Laguna Beach, CA
Write proposals, manage staff and biological data

- Conduct all aspects of fieldwork, data management, report writing, mapping
- Conduct fieldwork, author reports

Chief Ornithologist
Lamanai Field Research Center
Sep 1998 - Jun 2000 — Belize, Central America

- Develop and implement ecosystem-scale research on birds
- Manage volunteer biologists, lead birding tours, develop new tour clients

Permits

Recovery Permit TE-082233
US Fish and Wildlife Service
Jan 2005 - Present

- California Gnatcatcher, Southwestern Willow Flycatcher, Yellow-billed Cuckoo

Scientific Collecting Permit SC-11354
California Department of Fish & Wildlife
Jan 2010 - Present

Expertise

Field Biology
- Specialist in avian ecology and identification
- Sensitive species surveys including Desert Tortoise, California Gnatcatcher, Burrowing Owl, Least Bell's Vireo, Swainson's Hawk, Golden Eagle among many others
- Large-scale vegetation mapping projects and impact analysis
- CEQA, NEPA, FESA, NCCPs
- GPS and mobile field data collection systems

Geospatial
- Desktop software: ArcGIS, QGIS, GRASS
- Server and geodatabases: PostGIS, Spatialite
- Web mapping: Google Maps, OpenLayers

Project Management
- Array of projects in many industries
- Oversight of large multidisciplinary teams
- Reliably on time and within budget
- Collaborate with clients, agencies, other stakeholders

Office
- Operating systems: MacOS, Windows, Linux
- Mobile: iOS, iPadOS, Android
- Productivity Software: MS Office, Apple iWork
- Data Management: MS Access, Excel, Ninox, PowerApps, PostgreSQL
- Server: SharePoint, Plone, Linux

Education

B.Sc. in EEO Biology
The Ohio State University
Mar 1993 - Jun 1998

Management Development for Entrepreneurs
UCLA Anderson School of Management
Sep 2021 - Jan 2022

Certificate in Tropical Ornithology
Estación Biológica La Suerte, Costa Rica
Jun 1996 - Jul 1996

Below: *contemplating the upcoming day's work during implementation of a contract with the US Bureau of Land Management to survey Pygmy Rabbits in a remote area of northern Nevada in September 2017. England|Ecology led a three-person team that completed the work on time and under budget.*

Marcus C. England
Selected Project History

2017 to Present

Upper Westside Specific Plan | Upper Westside, LLC

- Apr 2019 - Apr 2022
- Sacramento County, California
- Swainson's Hawk, Giant Gartersnake
- PM, Surveyor, Author
- Biological Resources Assessment

As project manager and Director for Bargas, England conducted one year of Swainson's Hawk (SWHA) protocol surveys, managed SWHA and other species' survey efforts for two additional years, and authored a biological resources assessment addressing the potential effects of the proposed project on resources, including SWHA and Giant Gartersnake, within the context of the requirements of the Natomas Basin HCP and the Metro Air Park HCP, collectively addressing 22 covered plant and animal species.

Descanso Gardens Wildlife Management Plan | Descanso Gardens Guild

- Jan 2019 - Dec 2019
- Los Angeles County, California
- Special Status Species, Wildlife Habitats, Impacts
- PM, Surveyor, Author
- Wildlife Management Plan

This contract sought to provide solutions to some of the challenges of operating public gardens in a natural environment using guidance from nearby and similar facilities. The plan's goals were to increase the quality of native habitats for wildlife, minimize visitor-wildlife conflict, protect planted garden areas and facilities from wildlife damage, promote environmental research and education, and promote a regional habitat linkage. Fieldwork for the plan included 10 months of diurnal and nocturnal surveys as well as widespread camera trapping.

Harris Beach Management Unit Wildlife Assessment | Oregon Parks & Recreation

- Jan 2018 - Dec 2019
- Brookings, Oregon
- Colonial Waterbirds, Marine Mammals, Spotted Owl
- PM, Surveyor, Author
- Wildlife Assessment

England|Ecology was contracted by OPRD to prepare a wildlife assessment report. Because of the size of the survey area, the field component lasted two weeks and included wildlife and habitat documentation (including remote camera trapping), hiking every trail available within the included parks, and camping with Harris Beach and Alfred A. Loeb state parks. Final deliverables included geospatial data and a report documenting what is known and not known about the wildlife and habitats of the park unit, with suggestions for future research and management priorities.

Smith Rock State Park Wildlife Assessment | Oregon Parks & Recreation

- Jan 2017 - Jun 2017
- Deschutes County, Oregon
- Special Status Species, Bald and Golden Eagles
- PM, Surveyor, Author
- Wildlife Assessment

England|Ecology was contracted by the Oregon Parks & Recreation Department to prepare a wildlife assessment report for Smith Rock State Park located in central Oregon. The project required extensive pre-survey research; five field days on-site with over 30 miles of hiking, wildlife and habitat documentation (including remote camera trapping); and preparation of new geospatial data and an extensive report documenting what is known and not known about the wildlife and habitats of the park, with suggestions for future research and management priorities.

Owyhee Roads Fuelbreak Project | US Bureau of Land Management

- Jul 2017 - Oct 2017
- Humboldt County, Nevada
- Pygmy Rabbit
- PM, Surveyor
- Letter report, GIS data

England|Ecology was contracted by the US Bureau of Land Management (BLM) to conduct surveys for Pygmy Rabbit on 2,068 acres of BLM-managed lands. Two subcontractors were trained on survey methodology and identification of Pygmy Rabbit sign. The survey was completed over two weeks, involving 114 miles of transect walking per surveyor in often adverse weather conditions and over rough terrain. Final deliverables to the BLM included a report, photos, and geospatial data.

2016 and Prior

High Speed Rail Project - Bakersfield to Palmdale

T.Y. Lin

- Jan 2015 - Oct 2016
- Los Angeles and Kern Counties, California
- Swainson's Hawk, Golden Eagle
- PM, Surveyor, Author, GIS
- Biological Resources Letter Report

Raptor Conservation Strategy

Mitsubishi Cement & US Forest Service

- Jan 2016 - Oct 2016
- San Bernardino National Forest, California
- Golden Eagle
- PM, Surveyor, Author
- Biological Resources Letter Report

Santa Clara River Riparian Surveys

Newhall Land

- Jan 2010 - Oct 2016
- Los Angeles and Ventura Counties, CA
- Least Bell's Vireo, Southwestern Willow Flycatcher
- PM, Surveyor, Author
- Biological Resources Letter Report

Montebello Hills Conservation & Development Project

Cook-Hill Properties

- Jan 2007 - Dec 2009
- Los Angeles County, California
- California Gnatcatcher, Coastal Sage Scrub Restoration
- PM, Surveyor, Author
- Biological Resources Assessment, Biological Assessment

Terranea Resort

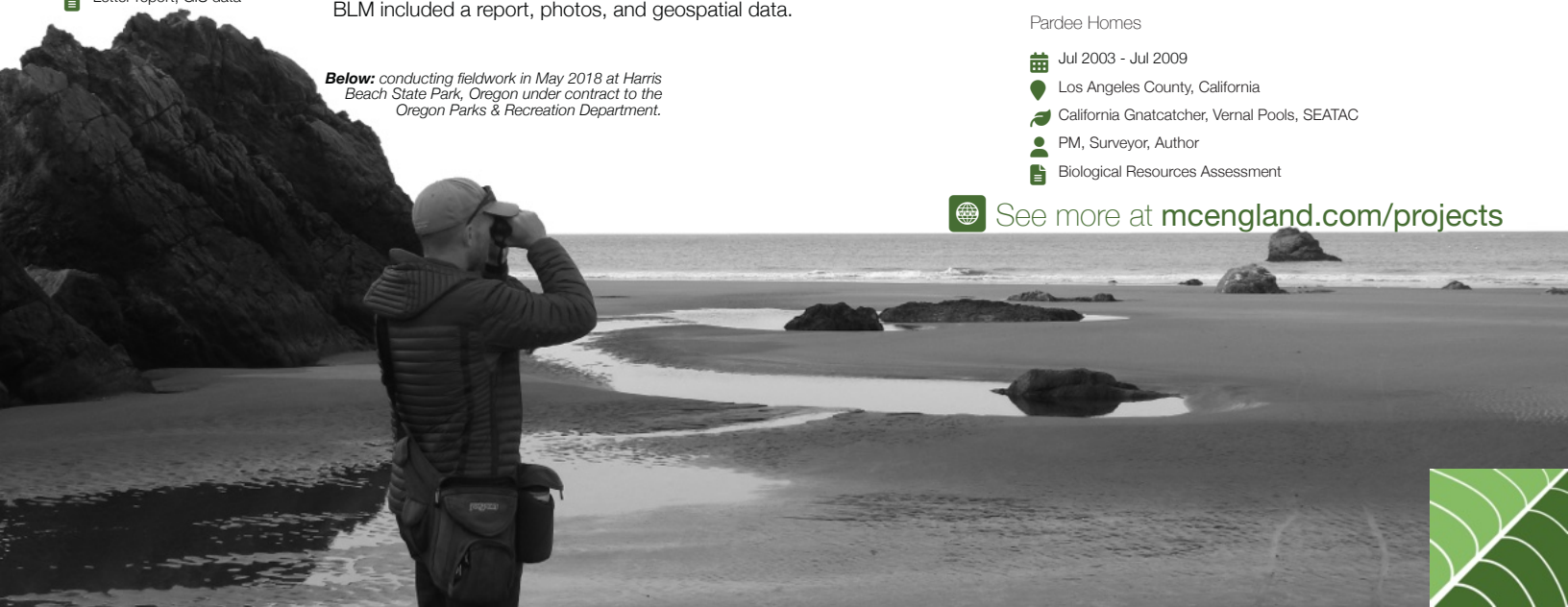
Long Point Development

- Jan 2005 - Jul 2008
- Los Angeles County, California
- California Gnatcatcher, Coastal Sage Scrub Restoration
- PM, Surveyor, Author
- Biological Resources Assessment

Skyline Ranch

Pardee Homes

- Jul 2003 - Jul 2009
- Los Angeles County, California
- California Gnatcatcher, Vernal Pools, SEATAC
- PM, Surveyor, Author
- Biological Resources Assessment



Below: *conducting fieldwork in May 2018 at Harris Beach State Park, Oregon under contract to the Oregon Parks & Recreation Department.*

See more at **mcengland.com/projects**

ROSEMONT AVE

N ARROYO BLVD

LINDA VISTA AVE

N ARROYO BLVD

ROSEMONT AVE