

**SANTA MONICA MOUNTAINS CONSERVANCY**

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April 5, 2010

Mr. Jimmy C. Liao, City Planner  
Environmental Review Section  
Department of City Planning  
200 N: Spring Street, Room 750  
Los Angeles, CA 90012

**SCH No: 86052110**

SMMC Attachment 04/26/2010 Agenda Item 9(c)
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**Draft Environmental Impact Report  
ENV-1986-0062-EIR-SUB**

Dear Mr. Liao:

As the principal State agency responsible for regional open space planning in the Rim of the Valley Trail Corridor, the Santa Monica Mountains Conservancy (Conservancy) should have been invited to participate in the environmental review process for this project. In addition, we did not receive the Notice of Completion and Availability of Draft Environmental Impact Report (DEIR). Please include the Conservancy in all future mailings concerning this project and future proposed projects in the Simi Hills.

The applicant proposes to develop 45 luxury single-family homes on 91 acres in the foothills of the western San Fernando Valley. The project will require the redistribution of 600,000 cubic yards of earth on site, including filling a major drainage above the Chatsworth Reservoir and forever altering the rocky hillsides that characterize the community. The applicant's claims of minimal disturbance to viewsheds and wildlife are misleading at best.

The 91 acre property is prime habitat contiguous to large blocks of open space to the south and north. The subject parcel serves as a direct habitat linkage between Chatsworth Reservoir and the Santa Susana Pass State Historic Park. The Simi Hills provide a narrow, essential connection between the Santa Monica and Santa Susana Mountains. Any further narrowing of this corridor risks genetically isolating the large mammal populations of each range. The DEIR contends that wildlife movement only takes place west of the project, across the county line in the designated corridor, however mammals don't follow administrative boundaries. The DEIR further claims that the project will not sever accessibility between the reservoir and State Parkland, which is patently false. Mammals seeking to travel between habitat blocks would have to detour up to five miles through a passageway narrower than the one the applicant proposes to close. The east-west orientation of the proposed project on the subject parcel ensures that zero wildlife

movement will be possible after development. Preserving this connection is vital to the future value of Chatsworth Reservoir as a wildlife refuge. Its loss or major degradation would be a significant unavoidable biological impact.

Due to its unique ecological value, the subject property has been identified for future acquisition by the State in the Chatsworth Reservoir to Santa Susana Pass State Historic Park Project Plan to preserve the habitat linkage described above. While funds for the purchase are not currently available, the City would be remiss to permanently close a wildlife passage due to a temporary lack of money.

The DEIR asserts that the project is not required to mitigate its cumulative biological impacts, despite the loss of habitat, because it represents only a marginal expansion of urban area. The project extends urban development literally to the county line, pushing wildlife completely out of Los Angeles County and shifting impacts to neighboring jurisdictions and State Parkland. The City cannot continue to justify urban expansion into sensitive areas by dismissing biological impacts. West of this project, there is simply no more space for this unsustainable growth.

The project proposes to create noncontiguous open space lots totaling 38 acres of non-public land. It is unclear how this land would be managed or habitat value maintained. The configuration of this open space is such that much of it may fall within the 200-foot fuel modification buffer, greatly reducing its habitat value. Furthermore, the applicant demonstrates his lack of commitment to open space by constructing a private equestrian center with all the associated physical structures on the supposedly open space lot. This center must be located on a separate lot and should not be counted as part of the open space dedication.

Furthermore, the project contradicts elements of the Chatsworth/Porter Ranch Specific Plan, which seeks "to further define the link between the Chatsworth Reservoir, wildlife corridors, and the community by identifying natural wildlife habitats, migration paths, and archaeological/paleontological sites and planning for their preservation." The project proposes to close one of only two viable linkages between the reservoir and the Simi Hills. The linkages have been identified and preservation planned, yet this project would compromise these planning efforts.

The project would also create significant impacts to visual resources by placing large houses on scenic hillsides within public viewsheds. The project would be visible from scenic

roadways covered in the Valley Circle Boulevard/Plummer Street Scenic Corridor Specific Plan. The DEIR somewhat addresses visual impacts to neighboring residents, but fails entirely to consider the viewshed from Chatsworth Oaks Park, immediately downhill from the subject property. The project would sever the visual connection between the public park and the scenic hillside above. Likewise, urbanizing land in close proximity to the State Park impacts visitors' experience of the natural area.

Additionally, the DEIR ignores potential hydrological impacts. By filling the major on-site drainage, the project would affect downstream runoff through Chatsworth Oaks Park and ultimately, the reservoir. While the applicant claims exemption from Clean Water Act jurisdiction, this does not eliminate the need to consider impacts to hydrological function, water quality, and groundwater recharge.

The trail proposed by the applicant goes from nothing to nowhere, providing little recreational value to the public. The trail would not connect to State Parkland to the north or public parkland to the south, which has been the direction of historical trail use on the property. Instead, the trail dead-ends into private property in Ventura County. For the applicant to provide a public benefit, the trail must connect to public lands. A trail corridor identified in the Santa Susana Pass State Historic Park Project Plan runs north-south across the subject property connecting Chatsworth Oaks Park to the State Historic Park. The applicant should provide a viable link in a public trail network rather than just serving the proposed private equestrian center.

The construction of the secondary access has multiple impacts that are not contemplated by the DEIR. Per City fire regulations, each development must have a primary and secondary access for evacuation and firefighting purposes. As designed, the project's two accesses rely on Andora Avenue, meaning that they should collectively only be considered as one access point. Furthermore, the proposed 20-foot-wide secondary access is not possible to construct within the existing easement without encroaching on State parkland. The California State Parks has indicated that they do not intend to grant permission for such an encroachment, rendering the secondary access inadequate. An additional impact from the secondary access construction is on the parcel immediately north of the subject property, which has also been proposed for development. Should the City find these two accesses adequate, the "Eagle's Nest" property to the north would likely be developed in the near future. Per CEQA guidelines, the DEIR must analyze the growth-inducing impact of providing new infrastructure to undeveloped areas.

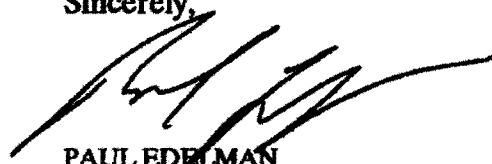
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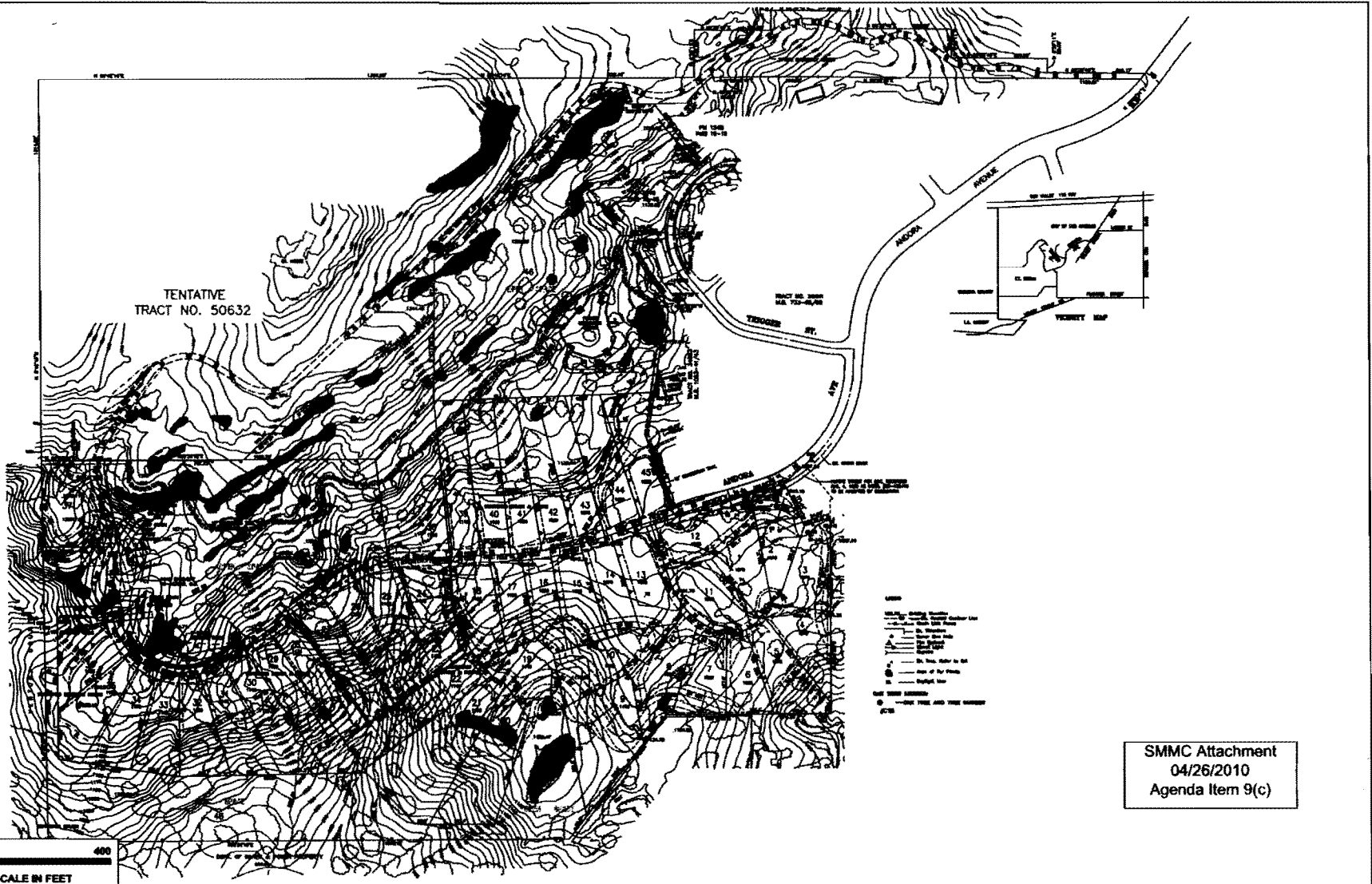
Finally, the DEIR is required by law to provide an economically and physically feasible environmentally superior alternative. By the applicant's own admission, one alternative is not environmentally superior and the other is not feasible. Therefore, the DEIR is deficient by failing to provide an alternative that allows economic use of the land without compromising environmental resources. A superior alternative would leave the western half of the property undeveloped to allow for wildlife movement. A public equestrian trail could be sited in this natural area, running north-south to connect to public parkland. Development would be confined to the area closest to Andora Avenue, shielded from the view of Chatsworth Oaks Park by the natural topography of the site. The applicant may have to reduce the size or number of the proposed units, but the project would remain economically feasible.

Please direct your questions and any future correspondence to my attention at the letterhead address and by phone at (310) 589-3200 ext. 128.

Sincerely,



PAUL EDELMAN  
Deputy Director  
Natural Resources and Planning



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