

SANTA MONICA MOUNTAINS CONSERVANCY

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September 28, 2007

Mr. Jon Foreman
City Planner/Project Coordinator
Department of City Planning
200 N. Spring Street, Room 601
Los Angeles, California 90012

**Comment Letter on the Notice of Preparation and Initial Study for the
Universal City Vision Plan, ENV 2007-0254 EIR**

Dear Mr. Foreman:

The Santa Monica Mountains Conservancy (Conservancy) offers the following comments on the Notice of Preparation and Initial Study for the Universal City Vision Plan, ENV 2007-0254 EIR (Project) located between the Santa Monica Mountains and the Los Angeles River. These comments address the Project's potential significant impacts on viewshed, water quality, recreation and open space, transportation and circulation, and biological resources. In addition, the Conservancy requests a clarification for the separate DEIRS addressing of the Metro Universal project and the Universal City Vision Plan as opposed to a unified document.

The Project would drastically change the character of a large area and surrounding neighborhoods with the proposed construction of tall commercial buildings, a residential project of 2,937 units, and a 500 room hotel. These visual, traffic (biological), and watershed related impacts would be unavoidably significant and adverse. CEQA requires the avoidance or substantial reduction of such impacts with project changes.

Mulholland Scenic Parkway Specific Plan

A portion of the Project site is within the boundaries of the Mulholland Scenic Corridor. The Project's proponents are proposing that the boundaries of the Mulholland Scenic

Corridor be redrawn to exclude that portion of the Project site from the Scenic Corridor. The City Council established the Mulholland Scenic Corridor in the Mulholland Scenic Parkway Specific Plan (Specific Plan) ordinance. The explicit purpose of the ordinance is to protect the visual and environmental resources of the Mulholland Scenic Parkway. The proponents' request is an extraordinary one. If granted, it would result in exempting the Project site from the guidelines and restrictions specifically adopted by the City Council to protect these resources in the Cahuenga Pass area, and throughout the Scenic Corridor. The Conservancy believes there is no reason or justification for the exclusion of the Project area from the Scenic Corridor. In any event, any DEIR for the Project must fully address this proposal, describing the location and character of the area proposed for exclusion, the proponents' rationale for the exclusion, and the effect of the exclusion on the Specific Plan and on the visual and environmental resources addressed by the Specific Plan.

Natural Medium-Scale Storm Water Biological Treatment Areas

The Project and most DEIR alternatives would result in significant increases in pollutants entering storm drains both on and offsite. In addition, the further development of the site would significantly reduce groundwater recharge in a unique area adjacent to the Los Angeles River. To compensate for these adverse effects the Project, and all of its economically feasible DEIR alternatives, must include medium-scale infiltration areas to remedy both impacts. Such infiltration areas need to be a minimum of 15,000-square-feet in size with 5,000-square-feet of buffer. The 356-acre site must include a minimum of 20 acres of natural infiltration area. Such features provide additional benefits such as habitat for birds and open space for public passive recreation and urban relief.

Cahuenga Pass Traffic Volume - Wildlife Movement

The Cahuenga Pass is the crucial lifeline habitat linkage between the Santa Monica Mountains and Griffith Park. If the Mulholland Drive bridge over US-101 in the pass becomes unusable to wildlife due to increased traffic, the population of all large mammals in Griffith Park will become inbred. Likewise, if a fire eliminates or nearly eliminates a species, there would be no other means for the City's largest park to be repopulated. The Conservancy stresses that the Project DEIR meticulously analyze cumulative impacts within Cahuenga Pass.

The DEIR must look at the Project's traffic impacts at least as far as the Cahuenga Pass. The current condition of Cahuenga Pass wildlife corridor is rapidly degrading due to increased traffic volume. The increase of traffic that will result from the Project will further the rate of deterioration. The construction of a house just south of the Mulholland bridge

on the east side of Cahuenga Pass exemplifies how even a small project adds to the problem of increasing traffic. The traffic study must look at cumulative impacts that include and identify several other projects that are either on-going or scheduled for a future date, such as the Metro Universal Project and the Hollywood redevelopment project.

Because of the impending increase in traffic and vehicles within Cahuenga Pass, the Project's traffic study area must extend along Cahuenga Pass and analyze traffic flow and rates throughout a 24 hour period over several days throughout the year, particularly near the Mulholland Drive and Vine Street overpasses where wildlife crossings have been informally documented. The consequential increase of traffic will significantly impact wildlife movement within the area. The Conservancy also insists that the Project conduct a wildlife movement study of Cahuenga Pass for the efficacy of the following mitigation measures. As mandatory mitigation, the applicant must be required to provide a \$4 million fund to the Mountains Recreation and Conservation Authority (MRCA) to be used solely to acquire and manage land directly tied to wildlife movement within half a mile of the Mulholland bridge.

Santa Mónica Mountains' Cahuenga Pass - Los Angeles River Connector Alternative

The Conservancy agrees with the Initial Study that the DEIR analyze the Project's potential impact on Griffith Park, Significant Ecological Area No. 39. To provide adequate open space the Project must take the opportunity to create and enhance a greenbelt through the eastern portion of the Project site (see attached figure). The significant Project impacts militate that a conservation easement or fee-simple title over the eastern portion of the Project site be given to the MRCA and the Los Angeles City Department of Recreation and Parks.

The Initial Study cites potentially significant impacts on biological resources including substantially adverse effects on various significant vegetation communities including coast-live oak, chaparral, riparian, ruderal, and cultivated landscapes. These communities are hosts to diverse populations of wildlife. The value of this land is enhanced by a potentially critical land connection across Barham Boulevard to the south side of the Oakwood Apartments. Essentially, via Griffith Park, this land is biologically connected to the Santa Monica Mountains' core habitat. To avoid absolute significant biological impacts, as a minimum, the Conservancy's full recommended open space easement area must be adopted. The open space to development square footage ratio, even with this southeastern permanent open space area, is still very poor.

Universal City Vision Plan, ENV 2007-0254 EIR

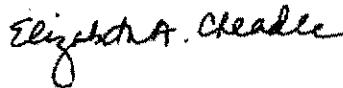
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The subject onsite open space area can also double as a trail corridor for local denizens to and from the Los Angeles River. How else can the project adequately contribute to the shortage of accessible park and open space areas? Dedicating a portion of the Universal Village District to wildlife habitat and open space is essential for public parks. A trail easement for public use should also be given to MRCA and the Los Angeles City Department of Recreation and Parks. The attached figure details critical trail alignments within the conservation easement to and from the Los Angeles River. Maintenance of both the conservation easement and trail easement can be performed by MRCA crews and sworn park rangers funded by a Landscape Maintenance District.

We respectfully request to receive all future documentation to be sent to the attention of Paul Edelman, Deputy Director of Natural Resources and Planning, at the above address and that questions be direct to his attention at (310) 589-3230, ext. 128.

Sincerely,



ELIZABETH CHEADLE
Chairperson