

SANTA MONICA MOUNTAINS CONSERVANCY

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October 4, 2010

Agenda Item 11(b)
SMMC 1/24/11
Attachment

Ms. Maya Zaitzevsky
Los Angeles Department of City Planning
200 North Spring Street, Room 763
Los Angeles, California 90012-4801

**Bel-Air Presbyterian Church Preschool
Proposed Mitigated Negative Declaration
ENV-2009-3085-MND; ZA-2009-3083-CU**

Dear Ms. Zaitzevsky:

The Santa Monica Mountains Conservancy (Conservancy) is concerned that the potential impacts of the Bel Air Presbyterian Church (BAPC) preschool are not mitigated to a level of insignificance after the mitigation measures proposed by the Mitigated Negative Declaration (MND). If greater measures are not implemented, then impacts must be fully studied in an environmental impact report. The subject property abuts the 20,000-acre Big Wild Core Habitat. The adjacent public open space is part of the territories of large mammals in the Big Wild and will be highly desirable and easily accessible public parkland in a few years. Animals also move from the Big Wild north across Mulholland Drive to smaller habitat areas.

Impacts from the proposed project would reduce the effectiveness of this habitat area and be highly visible from future hiking trails. The projected increase in traffic may increase wildlife mortality on surface streets and thereby decrease the viability of the existing movement corridors to the north. Furthermore, the intense use proposed adjacent to existing and future public parkland requires a greater buffer to decrease edge effects on habitat area to an acceptable level. The Initial Study failed to address any of these potential direct or indirect impacts to biological and aesthetic resources and the MND is therefore deficient.

Because the Initial Study failed to properly assess impacts to biological resources, the MND currently does not identify any mitigation measures for these impacts. The BAPC campus is adjacent to the County-owned former Mission Dump. The landfill will presumably be converted to public parkland in the future and already provides critical wildlife access to Mulholland Drive west of the subject property. The proposed project, including

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landscaped buffers and open areas, should be designed with this final state in mind to preserve habitat connectivity across the parcel.

The Conservancy is also concerned about the aesthetic impacts on the viewshed from Mission Canyon. A viewshed analysis should be conducted of the proposed project from the future parkland. A larger landscaped buffer area and setback would minimize these impacts.

The size of the proposed facility seems out of scale with the proposed use. The Conservancy is concerned that the BAPC is planning to use the facility for events or expand the school in the future beyond what is currently disclosed in the MND. If this is the case, then the project would be in violation of the California Environmental Quality Act (CEQA). CEQA prohibits the piecemealing of projects to circumvent full environmental review. Already, the recent expansion of the main church structure has increased the cumulative development impacts in the area. Any potential intensified use of BAPC property must be disclosed at this time and analyzed in one document.

As noted in the MND, the subject parcel is located within the Institutional Corridor, despite its current RE-40 zoning. Some aspects of the Institutional Corridor are incompatible with the broader Mulholland Scenic Parkway Specific Plan, including the Mulholland Core Trail and aesthetic preservation of the Scenic Parkway right-of-way. Therefore large projects in this location must be held to a high standard to meet both the requirements of large institutional campuses and the unique circumstances of a site on Mulholland Drive. Key concerns in this area include habitat connectivity, open space preservation, and recreational access, all of which would be significantly impacted by intense use of the Bel Air Presbyterian Church campus. Rather than respect the surrounding context, the MND cites inclusion in the Institutional Corridor as a suitable reason to disregard these impacts.

The Conservancy appreciates the BAPC's openness to public use of their facilities and recognizes the importance of the civic institution to its community. The question is how to best maximize total public benefit and to not achieve one set of benefits (facilities) at the expense of another (biological integrity). In the Mulholland corridor, open space is at a premium and remaining wildlife passages deserve full protection. Site design should therefore provide a greater native-landscaped buffer between buildings and Mission Canyon parkland and an open space dedication that facilitates wildlife movement.

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As previously mentioned, CEQA dictates that the development of the entire campus (all BAPC-owned parcels) should be considered as a single project with phased construction to allow for a complete analysis of the result. Therefore sufficient nexus exists to require dedication of a different parcel than the one proposed for the preschool (APN 4490-003-007) to mitigate the cumulative impact of previous piecemeal development of the campus. Transfer of fee ownership of a 5-acre parcel owned by the BAPC on the north side of Mulholland Drive (APN 2293-010-035) to a public agency would meet this mitigation requirement by providing quality habitat area.

To avoid future piecemeal analysis, this project should be considered to complete the build-out of the BAPC campus. All areas of BAPC property not presently analyzed for development impacts should be assumed to be permanent open space and protected accordingly. Such protection can be achieved by dedicating in-fee all remaining undeveloped property to or recording a conservation easement in favor of a public agency.

An additional mitigation measure must include the requirement to build the Mulholland Core Trail along the length of all BAPC properties. The trail must be designed to be compatible with future segments to the east and west of the subject parcels.

The proposed project requires multiple discretionary approvals which must be based on adequate environmental review. The Conservancy maintains that the current MND is deficient and must include more stringent biological and aesthetic mitigation measures or be replaced by a full environmental impact report.

Should you have any questions, please contact me at (310) 589-3200 ext. 128.

Sincerely,



PAUL EDELMAN
Deputy Director
Natural Resources and Planning

cc: Paul Koretz, Council District 5
Bill Rosendahl, Council District 11