

**SANTA MONICA MOUNTAINS CONSERVANCY**

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Agenda Item 12(b)  
SMMC  
1/24/11

September 14, 1998

Mr. Bill Cross  
Impact Analysis Section  
Los Angeles County Department of Regional Planning  
320 West Temple Street  
Los Angeles, California 90012

**Pepperdine University Upper Campus Development  
Draft Environmental Impact Report**

Dear Mr. Cross:

The Santa Monica Mountains Conservancy offers the following comments on the Draft Environmental Impact Report (DEIR) for the Pepperdine, Upper Campus Development.

The estimated 4.5 million cubic yards of grading on the 50-acre project site makes it one of the most massive grading projects in recent memory within the Malibu coastal zone.

The primary public policy objective to be pursued in this ecologically sensitive area should be to maximize the preservation of open space and to minimize disturbance to four sensitive plant species and to two sensitive plant communities, coastal sage scrub and native grassland. The DEIR's selection of Alternative Site No. 1 (Adamson property) as the environmentally superior alternative is suspect because the site is reserved for the construction of a hotel complex which is currently under review by the City of Malibu. The FEIR should clarify the underlying feasibility of proposing a project on land not owned by the applicant.

Because the site's exceptional habitat quality and proximity to other publically-owned natural areas, the FEIR should designate the "Reduced Expansion of Higher-Learning Educational Facilities" ("Reduced Expansion") DEIR alternative as the environmentally superior alternative in order to provide adequate public benefits commensurate with the numerous, significant ecological impacts.

If the economic or planning feasibility of the "Reduced Expansion" alternative is dismissed because of the need to export soil, then the FEIR or Supplemental EIR should include an alternative with a development footprint equal to or less than that of the "Reduced Expansion" alternative, but with a virtually balanced cut and fill grading plan.

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In addition, the DEIR fails to fully and specifically address the direct impacts and habitat fragmentation impacts of the proposed water tank for both the proposed project and for the "Reduced Expansion" alternative.

In keeping with the key public policy objective for the property, any plan chosen, except for the no project alternative, must include a public open space dedication. This is the only way to ensure adequate long-term resource protection and the important resource benefits corresponding with public open space.

The extent of deed restricted open space on the northern campus border is unclear in the DEIR. The FEIR must better delineate boundaries of such areas.

Under any development scenario, the FEIR must include a mitigation measure that deed restricts all remaining open space surrounding the campus that is not specifically entitled to date. Otherwise, any further degradation of habitat beyond the development area would represent piece-mealing under the California Environmental Quality Act. This mitigation measure is commensurate with the impacts of the proposed project and the "Reduced Expansion" alternative.

The Conservancy would accept the ownership of any easements or fee-title dedications. All brushing responsibility and funding for care of this open space should remain the responsibility of Pepperdine University.

Please direct any questions and documents to Paul Edelman at (310) 589-3200 extension 128.

Sincerely,



ELIZABETH A. CHEADLE  
Chairperson