



# United States Department of the Interior

NATIONAL PARK SERVICE  
Santa Monica Mountains National Recreation Area  
401 West Hillcrest Drive  
Thousand Oaks, California 91360-4207

In reply refer to:  
L76/NPS Tract No. 134-82

January 18, 2010

Kim Szalay  
Department of Regional Planning, County of Los Angeles  
320 W. Temple Street, Room 1362  
Los Angeles, CA 90012

Re: Pepperdine University Campus Life Project Draft EIR

Dear Mr. Szalay:

The National Park Service has reviewed the draft Environmental Impact Report (DEIR) for Pepperdine University's Campus Life Project (CLP), which proposes to upgrade athletic, recreation, parking, and residential facilities at the university's Malibu main campus. The project site is within the boundary of the Santa Monica Mountains National Recreation Area.

The National Park Service appreciates the opportunity to participate in the public review process for the proposed project. We provide comments on the effects of private and public land development in the Santa Monica Mountains at the invitation of state and local units of government with authority to prevent or minimize adverse uses. We assume a neutral position and do not support or oppose land development. We offer the following comments.

We are concerned the DEIR does not adequately mitigate for potential impacts to native habitat and wildlife. We would appreciate the County's consideration of the following comments and direction to the applicant of possible changes to the DEIR prior to certification.

### **Mitigation Measure 5.3-2, Vegetation and Sensitive Plant Communities**

The draft EIR states that 0.41-acre of California Encelia Scrub Alliance occurs within the development footprint for the expanded recreation area (Component 5). While the DEIR prescribes a revegetation plan for chaparral habitat, the DEIR does not, and needs to, prescribe mitigation specifically for the lost acreage of this sensitive plant community vulnerable to extinction or extirpation within California.

The proposed revegetation plan in the DEIR prescribes restoration of 0.29-acre of chaparral habitat to mitigate impacts to chaparral. Figure 5.3-5 identifies a proposed on-campus mitigation area for "Spanish Broom Removal and Coastal Sage Scrub Restoration."

However, aerial photography of the proposed mitigation site indicates low cover of invasive Spanish broom among a generally good cover of native coastal sage scrub. If broom is removed, areas of removal should be replanted with species associated with the California Encelia Scrub Alliance that would do well in a disturbed area.

We find the proposed Spanish broom removal mitigation would not be as effective as restoration of a more severely disturbed or degraded area than the site illustrated in Figure 5.3-5. If no such site exists in the campus vicinity, off-site restoration should be considered.

Component 5 has a development footprint which overlaps into 0.84-acre of a restoration area conditioned in a previous campus development permit. The 0.41-acre California encelia sensitive habitat mentioned in the DEIR is part of this 0.84-acre. The DEIR states this encroachment into the restoration area would be a significant, but mitigable impact (pg. 1-34). We believe conditions required for previous entitlements should be upheld, unless the new project offers conditions to override the previous permitted conditions and which offer a clearly superior benefit to the previous conditioned mitigation. The subject DEIR does not clearly prescribe mitigation for the loss of this 0.84 acre restoration site, and does not provide justification for overriding the previous conditioned restoration effort.

#### **Mitigation Measure 5.3-4, Pest Control**

In addition to the measures already outlined in this mitigation measure, a mitigation measure should be added that strictly prohibits use of anticoagulant rodenticides. Rodents that consume such poisons do not die immediately, but become weakened. They can travel out of the immediate area of poison application where in their weakened state they become attractive prey for predators, including large carnivores like bobcat and mountain lion. Anticoagulants have been identified as a factor in the deaths of mountain lions and bobcats in the Santa Monica Mountains.<sup>1</sup>

#### **5.7.2 Light and Glare**

The DEIR states that “All [light and glare] impacts would be less than significant; therefore, no unavoidable significant impacts related to light and glare would result from implementation of the CLP.” (p. 5.7-62). However, we are concerned that the project may increase light pollution within the national recreation area, both directly in the canyon in which the university is situated, as well as increasing overall nighttime ambient lighting and creating a glow above the ridgelines as viewed from adjacent canyons, including Corral, Solstice, and Malibu Canyons, and at nearby Malibu Bluffs Park. The DEIR’s own analysis includes light receptor site locations located at Malibu Bluffs Park (Sites H and T, Figure 5.7.2-1) that report a 60% (Table 5.7.2-6) and 25% (Table 5.7.2-7) increase, respectively, in illuminance over current background levels as a result of the proposed project.

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Riley, S. P., Bromley, C., Poppenga, R. H., Uzal, F. A., Whited, L., Sauvajot, R. M., 2007. Anticoagulant Exposure and Notoedric Mange in Bobcats and Mountain Lions in Urban Southern California. *Journal of Wildlife Management*, 71(6), 1874-1884.

The DEIR needs to more thoroughly evaluate the proposed lighting for the soccer stadium, in particular, for its potential cumulatively significant negative effect on wildlife and on diminished dark sky aesthetics in the adjacent open space, and in the above-mentioned adjacent canyons. We find any stadium-type lighting within the national recreation area is not consistent with our wildlife management and visitor experience goals and objectives and recommend against such lighting.

Thank you for the opportunity to comment. If you have questions, please call Melanie Beck, Outdoor Recreation Planner, at (805) 370-2346.

Sincerely,



Woody Smeck  
Superintendent

cc: Joe Edmiston, Executive Director, Santa Monica Mountains Conservancy  
Craig Sap, Acting Superintendent, Angeles District, State Department of Parks and  
Recreation  
Clark Stevens, Executive Officer, Resource Conservation District of the Santa Monica  
Mountains