

CALIFORNIA COASTAL COMMISSION

SOUTH CENTRAL COAST AREA
89 SOUTH CALIFORNIA ST., SUITE 200
VENTURA, CA 93001
(805) 641 - 0142



Agenda Item 10
SMMC
4-25-11

December 16, 2010

Mr. Kim Szalay
Los Angeles County Dept. of Regional Planning
Special Projects Section, Rm 1362
320 West Temple Street
Los Angeles, CA 90012

DEC 20 2010

Subject: Draft Environmental Impact Report for the Pepperdine University Campus Life Project (State Clearinghouse No. 2008041123)

Dear Mr. Szalay:

Commission staff has reviewed the subject draft environmental document for the Pepperdine University Campus Life Project, which consists of new and upgraded athletic, recreation, parking, and residential facilities. Based on our review of the Draft EIR (DEIR), we would like to offer the following comments at this time.

For purposes of CEQA, the DEIR has analyzed the proposed projects' consistency with various land use policies and regulations, including the Los Angeles County General Plan, Zoning Code, and Land Use Plan, the City of Malibu Local Coastal Program, and the University's Long Range Development Plan (LRDP). As discussed in the Land Use section of the subject DEIR, the proposed Campus Life Project components will require amendments to the LRDP that must be approved by the Coastal Commission. We would note that for the aspects of the proposed Campus Life Project that require amendment to the LRDP, the standard of review will be consistency with the Chapter 3 policies of the Coastal Act.

CCC-1

Component 5 of the Campus Life Project is the proposed Enhanced Recreation Area, consisting of an improved and expanded playing field on the site of the approved equestrian facility. A new debris basin located north of the proposed Enhanced Recreation Area would replace the existing debris basin. An existing stockpile area would be reduced in footprint and have a reduced capacity of approximately 8,000 cu. yds. of fill. In addition, a two million gallon underground, chilled water storage tank is proposed to be buried beneath the Enhanced Recreation Area. The component also provides a 1,600 square foot structure containing storage space and restrooms.

Similar to the other components of the proposed Campus Life Project, the Enhanced Recreation Area component will require an amendment to the LRDP that must be approved by the Coastal Commission. Again, the standard of review for LRDP amendments are the Chapter 3 policies of the Coastal Act. The proposed Enhanced Recreation Area would encroach into native vegetation areas within upper Marie Canyon and would result in additional modifications to the Marie Canyon Creek corridor that appear to constitute Environmentally Sensitive Habitat Areas (ESHA). Section 30240 of the Coastal Act requires that ESHA must be protected against disruption of habitat values, that only uses dependent on the resource may be allowed within ESHA, and that proposed development adjacent to ESHA shall be designed to prevent adverse impacts to those areas and be compatible with their continuance. In addition, Section


CCC-2

30231 of the Coastal Act requires that new development maintain, and restore where feasible, the biological productivity of coastal waters by controlling runoff, maintaining vegetation buffers that protect riparian habitat, and minimizing alteration of streams. Coastal Act Section 30236 limits channelizations, dams, or other substantial alterations of rivers and streams to flood control projects necessary to protect public safety and existing development and two other types of projects, any of which must incorporate the best mitigation measures available and where there are no feasible alternatives.

The Enhanced Recreation Area component of the proposed project appears to be inconsistent with these policies of the Coastal Act and alternatives should be analyzed, including alternative locations, to avoid impacts to native vegetation and the Marie Canyon Creek corridor that is beyond the footprint of the existing developed campus. In addition, with the proposed expansion of the footprint of the recreation area, the lighting upgrade, and increased nighttime use, there is the potential for adverse impacts to surrounding native habitat areas from increased night lighting that should be evaluated.

Thank you for the opportunity to review the subject Draft Environmental Impact Report. If you have any questions, please feel free to contact me.

Very Truly Yours,



Deanna Christensen
Coastal Program Analyst

CCC-2

CCC-3

Responses to Comments from California Coastal Commission

Response to Comment CCC-1

Commenter notes that the standard of review for aspects of the Project that require amendments to the Pepperdine University Long Range Development Plan will be consistency with the Chapter 3 policies of the Coastal Act. For further discussion of the Project's consistency with the LRDP, please refer to Section 5.11, Land Use, of the DEIR.

Response to Comment CCC-2

The entire Enhanced Recreation Area is within the University's developed Campus area and, therefore, contains existing developed facilities or has been subject to regular use or maintenance. The native vegetation and the Marie Canyon creek corridor, including the Marie Canyon debris basin and the upstream channel, located within the Enhanced Recreation Area site are not "relatively pristine," as the debris basin, channel, and all native vegetation at the site have a history of disturbance. Figure 5.3-2, Component 5 - Vegetation Communities Map in the DEIR shows the vegetation types and the location of the Marie Canyon channel within the proposed Component 5 footprint. As shown on Figure 5.3-2, the Project would encroach into areas consisting predominately of native vegetation in the southwestern corner of the site (greenbark ceanothus scrub [Cs/Ml/Cb]), the northern portion of the site (birch leaf mountain-mahogany scrub [Cb/Ml]), the central portion of the site (California encelia scrub [Ec/Bp/Et]), and within the Marie Canyon channel (black sage scrub [Sm] and mulefat scrub [Bs; Bs/W]). The greenbark ceanothus scrub has been subject to prior fuel modification and the birch leaf mountain-mahogany scrub has been encroached upon by use of the adjacent stockpile. The California encelia scrub is infested with invasive weeds, including the severely invasive Terracina spurge. The Marie Canyon debris basin and the portion of the Marie Canyon channel within the proposed Enhanced Recreation Area site have been subject to historical grading and prior cleanouts. The basin and channel also contain invasive species, and the channel contains minor amounts of placed debris.

Response to Comment CCC-3

An analysis of the potential for adverse impacts of night lighting on surrounding native habitat areas was conducted and has been included within the DEIR, see Section 5.7.2, Lighting. Sensitive receptor locations were located in natural areas and areas adjacent to residential sites. In all cases the Project did not result in a significant impact relating to light and glare.