

**SANTA MONICA MOUNTAINS CONSERVANCY**

RAMIREZ CANYON PARK  
5750 RAMIREZ CANYON ROAD  
MALIBU, CALIFORNIA 90265  
PHONE (310) 589-3200  
FAX (310) 589-3207  
WWW.SMMC.CA.GOV



June 27, 2011

Los Angeles Department of Water and Power  
Attention: Julie Van Wagner  
111 North Hope Street, Room 1044  
Los Angeles, California 90012

**Upper Stone Canyon Reservoir Water Quality Improvement Project  
Draft Environmental Impact Report Comments**

Dear Ms. Van Wagner:

The Santa Monica Mountains Conservancy appreciates the opportunity to comment on the subject Draft Environmental Impact Report (DEIR) and offers the following input on the document covering a critical habitat hub of the eastern Santa Monica Mountains.

The Conservancy is encouraged that the proposed project includes a 25-car park lot and a grossly-defined public trail system in the upper Stone Canyon watershed. We also appreciate that the DEIR specifically includes the Conservancy both to be part of the final trail design and set up of the proposed trailhead area. For the record, the Final EIR (FEIR) should also include the Mountains Recreation and Conservation Authority (MRCA) as a potential operator of the trailhead facility. The MRCA manages all Conservancy properties and has significant ranger and field maintenance capability.

Our agency is disappointed that all the other DEIR alternatives include no public access. To assuage any terrorism or vandalism concerns, the creation of adequate barriers between a trail head (combined with a reduced trail system) and any vulnerable reservoir operations could be achieved. The pairing of the more expensive proposed project (concrete reservoir cover) with public access and the least expensive, environmentally superior project (rubber covered reservoir) with no public access does not best serve the public interest. The only way to rectify those limited project component pairings is to include a new alternative in the FEIR entitled, "Reduced Impact Proposed Project." That project would have the rubber reservoir cover used on numerous other DWP reservoirs coupled with all the public access elements in the proposed project. That project does not introduce any new project elements or impacts and thus would not require recirculation of the DEIR if the document is challenged.

The Conservancy supports the proposed project because it provides the best view protection, medium term to permanent habitat provision, and good public access.

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However, public access requires public maintenance and law enforcement. Both of those require a steady revenue stream. The lack of future maintenance funding is not a significant potential project impact in and of itself and a mitigation measuring requiring maintenance funding is a late in the EIR process. We urge the Department to include a voluntary condition or mitigation measure that permits the trail head operator to charge for parking and issue tickets to those that do not pay the fee. The need for park use fees becomes more of an unwelcomed reality everyday.

The DEIR analysis on wildlife corridors and habitat linkages includes scant specificity and no figures. We urge the Department to include a map in the FEIR that shows how the only guaranteed route for larger, human adverse wildlife to move to either side of the large lower Stone Canyon Reservoir is around the north end of that reservoir and the upper reservoir. To show the Department's commitment to maintaining east-west habitat connectivity in the Santa Monica Mountains, we urge that the FEIR include a voluntary mitigation measure for the provision of a wildlife corridor conservation easement to the MRCA. That easement would encompass all area in the Stone Canyon Reservoir Complex that is located north of the southern limit of the existing upper reservoir and that is not part of any existing development or development contemplated by the subject project.

Please direct any questions and all future correspondence to Paul Edelman of our staff at the above letterhead address and by phone at 310-589-3200 ext. 128

Sincerely,

ANTONIO GONZALEZ  
Chairperson