

SANTA MONICA MOUNTAINS CONSERVANCY

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August 29, 2011

Ms. Alejandrina Baldwin
Land Divisions Section
Los Angeles County Department of Regional Planning
320 West Temple Street, Room 1348
Los Angeles, California 90012

**Hidden Terraces Project, County Project No. PM070606-(3)
Environmental Impact Report - Notice of Preparation**

Dear Ms. Baldwin:

The Santa Monica Mountains Conservancy (Conservancy) is the principal State planning agency charged with protecting open space and wildlife movement corridors in the vicinity of the subject project. As such, the Conservancy offers the following comments in response to the Notice of Preparation of a Draft Environmental Impact Report (DEIR) for the Hidden Terraces Project.

The proposed project would develop 263 units in two structures on 26.5 acres in a primary wildlife corridor in the Santa Monica Mountains North Area in close proximity to Conservancy-owned parkland at Upper Las Virgenes Open Space Preserve and Mountains Recreation and Conservation Authority (MRCA)-owned parkland south of the 101 Freeway. Additionally, the MRCA has conservation easements over the Mountain View Estates open space in Crummer Canyon and over the drainage between the subject property and the Mesivta School. The project site is surrounded by protected open space and parkland. This open space, including the subject property, is a primary Inter-Mountain Range Wildlife Corridor. Wildlife currently travels from Upper Las Virgenes Open Space Preserve south through the subject parcel and east to the Mureau Road overpass across the 101 Freeway to MRCA parkland. Future installation of a wildlife undercrossing will create an even more direct movement path through the area. The DEIR analysis should reflect this information in the project description and impact analysis.

The project's location amidst sensitive biological resources in a regionally significant habitat linkage necessitates careful evaluation of its potential impacts. The proposed project would have a significant adverse impact on the Crummer Canyon wildlife corridor between the Simi Hills and Santa Monica Mountains and potentially render futile planned

improvements to the freeway crossing. The project location would eliminate a feasible undercrossing location in the eastern drainage. Due to existing constraints on the movement corridor, there is little tolerance for additional ecological impacts. Therefore, the thresholds of significance for biological impacts will be low, with even relatively small additions of light and noise to the project area prompting special concern.

Project Will Impair Regional Habitat Connectivity

The project proposes an intense urban land use in the center of a critical habitat linkage between the Santa Monica Mountains and the Simi Hills. A 263-unit full-service adult residential facility, complete with 24-hour staff, will add a tremendous amount of light, noise, and traffic to a narrow open space corridor, with impacts to both on and off-site resources. This assessment is not limited to the size of the proposed project, as any 24-hour institutional use on the subject property would surpass the aforementioned low thresholds of significance for biological impacts.

The proposed nine-acre building and parking lot footprint would be located in the northern portion of the subject property, which forms a gentle bowl draining east toward the Mesivta School drainage. The southern portion of the project site is a prominent and designated-significant ridgeline, with steep topography facing the 101 Freeway. These site characteristics make the bowl and eastern drainage a far more likely path of movement from Crummer Canyon east toward the Mureau Road freeway overpass in comparison to the Crummer Canyon to Mureau Road route described in the Initial Study.

These site characteristics and limitations were discussed in the report “Critical Wildlife Corridor/Habitat Linkage Areas Between the Santa Susana Mountains, the Simi Hills, and the Santa Monica Mountains” (The Nature Conservancy, 1990). That report emphasized the importance of the eastern drainage in both current movement patterns and any future undercrossing connection. A figure from the report shows the bowl, identified as an “Illegal Polo Field”, and eastern drainage as part of the Critical Wildlife Movement Zone.

Initial Study Does Not Adequately Describe Impacts to Significant Ecological Areas

The Initial Study errs in assuming that the project will not impact a Significant Ecological Area (SEA). While the study is correct that the adopted SEA is to the west and south of the project site, proposed SEA revisions based on more recent biological data do include the subject property as part of a connection from Crummer Canyon to the Mureau Road freeway overpass. This habitat connection is critical to wildlife populations south of the

freeway in the adopted SEA, hence its inclusion in the proposed revisions. Furthermore, Crummer Canyon is not by itself the Inter-Mountain Range Wildlife Corridor, but one part of it. The corridor includes the subject site, which acts as an open space funnel for the crossing point to the southeast. In fact, Mureau Road along the southern edge of the subject property is narrow, steep, and unshielded from freeway noise—and the project proposes to make these conditions even less inviting for wildlife. As stated previously, a far more likely path for wildlife movement is up the drainage toward the Mesivta School, across the main bowl on the subject site, and over the ridge to Crummer Canyon. This biological relationship and movement corridor must be studied and discussed in the DEIR. To reflect the current state of biological knowledge, the project should be evaluated against the draft SEA boundaries.

DEIR Must Study Wildlife Movement Routes

Due to these route uncertainties, the DEIR must include an exhaustive, multi-season survey of wildlife occurrence and movement to ensure that project location does not sever a movement route from Crummer Canyon across the 101 Freeway. It is currently unknown whether wildlife descends Crummer Canyon to Mureau Road directly or crosses over the ridgeline through the project site—likely a combination of both. The DEIR must include an evaluation of nearby 101 Freeway crossings, including overpasses, bridges, and culverts potentially used for wildlife crossing. The DEIR must include a discussion of the project's potential impacts on each crossing. The discussion must consider low-frequency, but high-importance events, such as mountain lion crossings.

Project Will Introduce Noise and Light Pollution and Traffic to Sensitive Habitat

Unlike the rural residential development contemplated by the site's zoning, the proposed project will generate light, noise, and traffic 24 hours a day. The around-the-clock operations will contribute to both ambient and point noise and light pollution. This activity will deter nocturnal wildlife movement for all non-urban tolerant species. The DEIR must analyze and propose mitigation measures that shield habitat areas from noise and light pollution generated by the project. For the purposes of this analysis, the natural habitat areas surrounding the project should be considered as sensitive receptors.

Traffic generated by the facility will likewise be 24 hours a day, increasing vehicle trips at exactly the times that nocturnal wildlife is most active. This has the potential to dramatically increase vehicle-induced mortality in the corridor—one of the leading causes of wildlife mortality in the Santa Monica Mountains. Additionally, vehicles are significant

sources of light and noise pollution both while driving and parking. The DEIR must analyze expected travel patterns, including vehicle trips at all hours of the day, and discuss the impact on biological resources. It is likely that this impact will be significant, even with mitigation.

Project's Location Exacerbates Transportation Impacts

Due to the project's locational inefficiency, its travel demand will be disproportionate. In an area without proximity to goods and services, every trip will necessarily be via motor vehicle on a rural road. The project's projected 762 daily trips represent a significant increase in traffic volume on Mureau Road. Furthermore, the future residents of the facility would move to this isolated location precisely when many adults lose their ability to drive. The project does not facilitate "independent living" by locating far away from needed goods and services.

The proposed improvements to handle additional traffic capacity will exacerbate impacts on wildlife by widening the pavement surface to be crossed and facilitating higher vehicle speeds. Roadway width is inversely correlated to successful wildlife crossing. Higher speeds increase engine and tire noise while decreasing drivers' ability to avoid wildlife collisions. Mureau Road improvements may also increase the attractiveness for cut-through traffic avoiding the 101 Freeway, increasing travel volume by a factor greater than just trips generated by the project. The proposed transportation to the facility is poorly designed for both humans and wildlife, primarily due to the project's ill-considered location.

Visual Impacts Must be Fully Analyzed

The project's location amidst public open space and a designated scenic highway is likely to cause aesthetic impacts to public viewsheds. The DEIR must include a visual impact study with photosimulations from parkland vistas and trails in the vicinity, including Upper Las Virgenes Open Space Preserve, Zev Yaroslavsky Las Virgenes Highlands Park, and the New Millennium Loop Trail.

Wildfire Risk Must be Studied

The DEIR should evaluate the introduction of potential ignition sources associated with intense human use into an area of high fire hazard. The Conservancy must question the wisdom of locating over two hundred units for mobility-limited persons in a wildfire hazard zone. Even with standard secondary accesses and other design features, the likely

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evacuation of the project would pose a burden on emergency workers during a fire event. Both the primary and secondary access driveways are from Mureau Road.

Grading Would Alter Area's Topography

The proposed location of the primary access, as proposed, would require excessive grading across a prominent ridgeline. With the proposed detention basin, the access leaves little east-west habitat connection across the property. Additionally, the ridgetop private park entails substantial grading (24,460 cubic yards) and landscaping across the desired movement corridor. The DEIR should include alternatives that rearrange the project elements, including an alternative with primary access from the east and an alternative that excludes the ridgetop park.

Furthermore, the project proposes to redirect flows from the bowl area to a detention basin in the southern portion of the site. The impact of this diversion on the intermittent drainage to the east of the site should be evaluated. Grading may affect underground flows as well, which could reduce flows at the year-round seep in the eastern drainage. If flow patterns are altered in a way that could affect riparian habitat quality in the protected drainage or deprive wildlife of a vital water supply, adequate mitigation must be proposed. These potential hydrological impacts must be fully explored.

Land Use and Zoning Impacts are Severe

The proposed project is not at all consistent with the site's Mountain Land designation. The current zoning was a deliberate effort to shield the sensitive rural area from intense land uses like the one proposed. The DEIR must discuss the project's compatibility with surrounding land uses and provide a strong rationale for why this is an appropriate location for such a facility.

Project Site Contains Known and/or Likely Occurrences of Special Status Species

The Conservancy looks forward to reviewing detailed surveys of sensitive plant species likely or known to occur on site, including Braunton's milk-vetch, San Fernando Valley spineflower, Santa Susana tarplant, slender-horned spineflower, Agoura Hills dudleya, Conejo dudleya, Conejo buckwheat, California Orcutt grass, and Lyon's pentachaeta. The site's suitability as habitat for special status animal species must also be studied.

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Cumulative Impacts Amplified by Proposed Land Use Change

The cumulative impact analysis must include an evaluation of remaining vacant private parcels in project vicinity. If the project's zone change and plan amendments are approved, the assumption must be that other low-density parcels are no longer bound by their land use designations as well when analyzing cumulative impacts. To accurately evaluate cumulative impacts, residential density equivalent to that of the proposed project should be extrapolated to all other vacant private parcels taking access from Mureau Road, in addition to other planned projects in the vicinity.

Additionally, the DEIR must analyze the growth-inducing effect of providing access to adjacent parcels. The proposed secondary access road would increase the potential for development on two or three nearby parcels in the habitat linkage.

Project is Inconsistent with Adopted Plans and Current Planning Principles

In general, the Conservancy emphasizes that this site is not appropriate for such a use. The Santa Monica Mountains North Area Plan rightfully intended to keep this area rural and facilitate compatible uses between natural habitat and human development. This project is an intense land use requiring large grading and development footprint impacts to the natural landscape in a sensitive and highly constrained wildlife movement corridor.

While the need for adult residential facilities is indisputable, the proposed location is not a suitable location for such a use. The project site is an isolating environment for seniors, with no proximate access to goods or services. Every daily need will require seniors to drive on high-speed, curving roads or rely on family members that likely do not live close by due to the project's isolation. Good planning would locate this facility in a location where "independent living" is truly possible.

If you have any questions, please contact Paul Edelman of our staff at (310) 589-3200, ext. 128. Please send all project materials to him at the letterhead address.

Sincerely,

ANTONIO GONZALEZ
Chairperson