

**SANTA MONICA MOUNTAINS CONSERVANCY**

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March 30, 2015

Karen Hoo  
City of Los Angeles  
200 N. Spring Street, Room 750  
Los Angeles, California 90012

**DRAFT**

**Notice of Preparation Comments  
Andora Project, Chatsworth, Simi Hills  
SCH No. 2015021057**

Dear Ms. Hoo:

The Santa Monica Mountains Conservancy provides the following comments on the proposed 42-unit project on 91 acres between Santa Susana Pass State Historic Park and Chatsworth Oaks Park in the Simi Hills. Apparently the applicant promised to reduce the project unit count to 33 and to shrink the development footprint if the Chatsworth Neighborhood Council Planning and Land Use Management Committee supported the project. That approval occurred. However the full Chatsworth Neighborhood Council voted not to support the project. The Conservancy's comments apply to either project because both would result in unavoidable significant adverse biological, hydrological, and visual impacts. The project is in a Los Angeles County-designated Significant Ecological Area.

A 25-30 acre direct grading footprint with a 200-foot-wide, 11-acre permanent brush clearance impact zone in the core habitat section of the Simi Hills that is a habitat linkage to the Chatsworth Nature Preserve is an unavoidable significant adverse biological impact. The degree of that impact increases because the subject property is bound on both sides by public parkland. This level of impact can easily be avoided by reducing the project footprint westward.

The direct and permanent loss of approximately 20 acres of rainfall infiltration area in a Chatsworth Nature Preserve watershed is unavoidable and significant. The degree of that impact is increased because all surface flows on the project would be directed into the City street system and storms and thus not into Chatsworth Reservoir watershed.

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The current viewshed of the subject property from Valley Circle Boulevard, Chatsworth Nature Preserve, and Chatsworth Oaks Park is of natural land. The proposed project's permanent brush clearance zone and night time light glare would be visible from these public locations as well as from portions of the State Park. This avoidable degradation of a scenic corridor viewshed would be a permanent significant adverse visual impact.

To avoid multiple unavoidable significant adverse impacts, the project footprint must be reduced beyond the applicant's 33-unit proposal promised to the community. A grading footprint that extends approximately 650-feet deep into the subject parcel from the current paved end of Andora Avenue appears to tuck the project in to avoid substantial viewshed impacts, sufficiently minimize the loss of watershed catchment potential, and leave adequate habitat linkage width (approximately 1500 feet). A project with a 650-foot-deep grading impact leaves room for 14 homes on one double loaded street with 85-foot-wide lots. It also accounts for a 50-foot-deep fill slope at the terminus of the street. That number of houses raises to a total of 18 with 65-foot-wide lots and to 21 units with 50-foot-wide lots. A 50-foot-wide lot can easily accommodate a 3,000-square-foot two-story house.

## **Suggested Project Alternative**

The Conservancy asserts that the following project be included in the Draft Environmental Impact Report (DEIR) as a project alternative to be evaluated. Project alternatives by definition must be feasible. The DEIR project objectives must not be written to exclude projects that provide considerable economic return and substantially avoid and reduce significant project impacts.

The suggested alternative would intrude approximately 650 feet into the subject property from the end of existing paved Andora Avenue. The lots would be approximately 75-foot-wide and 200 feet deep with protective conservation easements over the back 100 feet. The maximum street length would be 630 feet. This housing cluster would tie into the existing alignment of the existing proposed emergency access road before it crosses the property boundary. Fill would be obtained from back cutting, but not piercing the visibility of, the prominent knoll that currently is proposed for a culdesac just south of current terminus of Andora Avenue. Individual pads would be stair stepped with 2 to 3 levels to minimize grading and land form modification.

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To the extent allowed by the City and the City agency owning the downstream property, a maximum quantity of stormwater runoff would be directed downslope and thus not into the City street and storm drain system.

The remainder of the property would be a fee simple dedication to a public park agency as a condition of map recordation.

## **Summary**

Unless the direct and indirect project footprints are significantly reduced, the project would result in several unavoidable significant adverse impacts as demonstrated above. There is no public policy justification to approve a project that intrudes more than approximately 650 feet into the subject single parcel. The simple provision of \$1,000,000 homes to the available San Fernando Valley housing supply does not provide adequate justification. The short term construction jobs do not offset permanent impacts to existing tax payer funded public parkland, viewsheds, and a regional habitat linkage. This is particularly true with the fact that there are obvious less damaging project alternatives such as the alternative project proposed above.

Please direct any questions and all future documents pertaining to this case to Paul Edelman of our staff at the above letterhead address.

Sincerely,

LINDA PARKS  
Chairperson