

SANTA MONICA MOUNTAINS CONSERVANCY

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Tyler Montgomery
Los Angeles County
320 West Temple Street
Los Angeles, California 90012

Draft Environmental Impact Report Comments
Aidlin Hills Project PN 00-136
SCH No. 2014091027

Dear Mr. Montgomery:

The Santa Monica Mountains Conservancy (Conservancy) offers the following comments and recommendations on the above-referenced Draft Environmental Impact Report (DEIR) that abuts the Conservancy's Pico Canyon Park, a component of the Santa Clarita Woodlands. The proposed project with 3,200,000 cubic yards of grading, 102 houses, two large water tanks, and an intrusive elevated secondary access road would represent a major intrusion into the Santa Susana Mountains core habitat area.

The elimination of 53 acres of core Santa Susana Mountains habitat, permanent annual stripping of 13 acres of habitat for fuel modification, and all of the indirect impacts--such as lighting--of a 102 home subdivision comprises a significant biological impact on the ecological sustainability of the lower Pico Canyon watershed.

Much of the 2,300,000 CY of grading--a 1,500-foot-long section of development-- would be starkly visible from Pico Canyon Road. That viewshed would be further marred by a 1,500-foot-long, 200-foot-wide fuel modification zone below that long row of ridgeline houses. The combined development visibility, including lighting, and the fuel modification is a potentially significant visual impact from Pico Canyon Road.

As proposed, the project would adversely affect an approximately 4,000-foot-long section of viewshed along a scenic roadway. The location of 102 homes and streets with their night lighting impacts on the edge of the Santa Susana Mountains ecosystem in full view of both Pico Canyon Road and all associated public trails and sidewalks would result in unavoidable significant adverse visual impacts. The proposed landscaping along the front of the development cannot guarantee the blocking of views over the life of the project. The

beautiful rural feel of the site that leads to the entrance of Mentryville Park, would be substantially degraded. The visual character and quality of the site and surroundings would be substantially degraded. That viewshed degradation is avoidable with moderate project modifications.

These significant visual and biological impacts can easily be avoided by reducing the project footprint at higher elevations. It is good that approximately 70 percent of the site would not suffer from direct project impacts. However, the proposed area to be impacted has an average slope area that exceeds 40 percent and approximately 80 percent of the proposed development area has slopes in excess of 25 percent. The project itself does not meet its DEIR objective of placing development in flatter terrain. The mass graded project (3.2 million cubic yards of earth) does not fit the terrain or the natural landscape setting. Each house would require 25,000 cubic yards of grading.

The impacts (to the remaining 30 percent of the site) are not miraculously dissolved because the applicant proposes not to develop the undevelopable other 70 percent of the property.

All of the biological mitigation measures offer no permanent or adequately defined mitigation value. The biological mitigation measures only address giving animals in the development footprint some warning before their habitat is destroyed, or they represent deferred mitigation with undefined mitigation sites and performance criteria. The DEIR biological mitigation measures are inadequate to compensate for the loss of 66 acres of habitat in the Santa Clarita Woodlands area. The protection of the open space is valuable but, it does not offset the direct permanent impacts to at least 66 acres of habitat.

In order for the open space component of the project and each of its DEIR alternatives to provide the DEIR represented habitat values, the DEIR must provide both permanent third party land protection mechanisms and adequate funding to manage the open space for intrusions, trash, and other adverse occurrences.

The DEIR objective to provide added fire flow is noble, but the DEIR provides no evidence that the requested amount is necessary. What evidence is provided that the adjacent development needs additional fire flow to warrant significant impacts? It appears that this project objective is designed to deflect objection to the project more than to supply defined needs.

The design of the One Valley One Vision Alternative is physically infeasible because of topographic and drainage constraints. For this reason alone the alternatives analysis is flawed and deficient.

As addressed in the DEIR, the One Valley One Vision Density Control Alternative would greatly reduce many of the significant project impacts produced by the proposed project. Those reductions would take the level of impact below the level of significant.

The Reduced Density Alternative avoids all substantial impacts and should be the project approved by the County. It is the only alternative without adequate impact reduction and public benefits.

The greenhouse gas emission baseline must not be adequate in the DEIR if 2,300,000 cubic yards of grading do not result in a significant green house gas production impact.

The DEIR is deficient because the project and alternatives do not include a public trail from Pico Canyon Road up Wickham Canyon to the proposed public open space lot. The DEIR is deficient because the wildlife movement effects on the proposed culvert size for the emergency access road to Verahda Court is not addressed. The DEIR is deficient because wildlife impacts from Verahada Court street lighting is not addressed.

The DEIR is deficient because it does not address the full fee simple dedication of the open space to a public park or open space agency as a prerequisite of tract map recordation. Such timely transfer is essential to preserve the ecological values of the open space described in the DEIR.

The DEIR is deficient because it does not address how irrigated perimeter slopes will adversely impact south coast horned lizards via sustaining Argentine ant populations.

The DEIR is deficient because it does not address in detail what County Flood Control District clean out requirements will be placed on the proposed storm water infiltration basins in regards to perpetual loss of wetland vegetation.

Please contact Paul Edelman, Deputy Director of Natural Resources and Planning, at 310-589-3200, ext. 128 with any questions and future correspondence.

Sincerely,

LINDA PARKS
Chairperson