

SANTA MONICA MOUNTAINS CONSERVANCY

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July 27, 2009

Agenda Item 11(c)
SMMC
1/11/16

David Somers, Environmental Review Coordinator
Environmental Review Section
Department of City Planning
City of Los Angeles
200 North Spring Street, Room 750
Los Angeles, California 90012

**DEIR Comments Vesting Tentative Tract Map No. 69970
Verdugo Hills Golf Course Project**

Dear Mr. Somers :

The Conservancy concurs with the Draft Environmental Impact Report (DEIR) that the proposed project in the Verdugo Mountains would result in numerous unavoidable significant adverse impacts. Under no circumstances does it appear justifiable for the City to approve the project with a statement of overriding considerations. A much greater attempt must be made to avoid ecological and visual impacts.

Our agency questions whether the DEIR's range of feasible alternatives is broad enough to include one alternative that attains most of the basic project objectives while avoiding or substantially lessening the significant environmental impacts as required by CEQA. Alternative 2, the purported environmentally superior alternative, would result in significant adverse visual impacts along at least the upper affected section of Tujunga Canyon Boulevard. The three proposed blocks of townhomes proposed in this alternative between Tujunga Canyon Boulevard and the channelized Blanchard Creek would produce the bulk of the impacts. Those impacts also include extensive fuel modification on a visible hillside located to the west of the flood control channel.

A project on the proposed site can substantially further reduce the visual and ecological impacts of those three blocks of townhomes as follows. Without question the most upstream (northern) block must be eliminated. This will substantially reduce both on and offsite required fuel modification. The vacated area should be lightly irrigated open space (either public or private) that is permanently deed restricted. The removal of the proposed building also allows for the potential layback of a portion of the concrete Blanchard Creek channel.

The middle cluster must also be removed entirely from the project unless the applicant can perfect a plan with the Fire Department to permanently confine all fuel modification not associated with the southernmost building to the existing triangular-shaped disturbed area on the opposing side of the flood control channel. By using fire resistant building design, irrigating this triangular area, and running a six-foot-high block wall twenty feet west of the flood control right of way, the Fire Department might be amenable to such a plan. The twenty feet of additional land parallel to the County flood control right of way would also be reserved for future layback of the channel walls.

If the Fire Department requires additional habitat disturbance completely as a result of the position of the middle building, the building should be eliminated. In any case these project modifications would leave 80 percent of the project as permanent open which meets the objections set out in the Conservancy's Notice of Preparation comments.

For the Conservancy to support this one or two building reduction of Alternative 2 the following additional mitigation measures must be added to the approved project.

The natural open space (not including the golf course) must be dedication in fee simple to a public park agency prior to the recordation of the tract map.

The HOA must provide \$5,000 annually for public agency maintenance of the natural open space.

There must be a dedicated multi-use trail easement dedicated to a public park agency along the west side of the flood control channel that also skirts the northern edge of the existing golf course area. This trail easement must allow a feasible connection to the property to the west that the Mountains Recreation and Conservation Authority has under escrow.

The remainder golf course area must be permanently protected via conservation easement or fee simple dedication to a public agency.

The proposed golf parking lot shall be usable by hikers choosing to use the west trail to Haines Canyon Park or a future trail up either side of the Blanchard Creek flood control channel.

The golf course must remain open to the public.

The Conservancy reserves the right to submit additional comments.

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

Sincerely,

A handwritten signature in purple ink, appearing to read "Ron P. Schaffer". The signature is fluid and cursive, with the first name "Ron" being the most prominent.

RONALD P. SCHAFER
Chairperson