

SANTA MONICA MOUNTAINS CONSERVANCY

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January 28, 2008

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

**Notice of Preparation Comments
Vesting Tract Map No. 69976
6435 La Tuna Canyon Road**

Dear Mr. Somers:

The Santa Monica Mountains Conservancy offers the following comments for the preparation of the Draft Environmental Impact Report on Vesting Tract Map No. 69976.

The proposed development of high density residential development on the subject site located at the northwest corner of Tujunga Canyon Boulevard and La Tuna Canyon Road would unequivocally result in unavoidable significant adverse ecological and visual impacts within the Rim of the Valley Trail Corridor zone. Decision makers must be presented with economically feasible alternative projects that either avoid or reduce significant impacts to biological and visual resources in the Draft Environmental Impact Report (DEIR). Unless the amount of proposed open space in a completely natural state (not including areas in fuel modification zones) exceeds 80 percent of the site, the Conservancy sees no public policy justification to increase either the allowed density on the site or any variances or plan exemptions.

The subject area is part of a northern section of the Verdugo Mountains ecosystem located north of the 210 Freeway. The ecological capacity of this east-west trending habitat block will be greatly compromised with the development of the either, or both, of the Duke (Tract No. 48754) or Canyon Hills (VTT Map No. 61672) projects located to the west. The DEIR must address the potential cumulative impacts of the project along with these approved projects on the ecological viability of this portion of the Verdugo Mountains.

Need for Significant Footprint Contraction

Several economically feasible DEIR alternative projects should incorporate the following project footprint adjustments. Although the proposed project footprint for 229 home appears to be approximately confined within the footprint of the existing golf course, the combination of cut slopes and many acres of fuel modification would result in either the

permanent loss or degradation of (conservatively) over ten acres of high quality habitat. The host of indirect impacts that come from a residential subdivision--such as domestic animals, lighting, noise and unauthorized uses--would result in additional adverse ecological impacts. The only way to avoid, or greatly reduce, these impacts is to contract the project footprint away from all natural areas such that no fuel modification is required in existing chaparral. Such footprint contraction will also obviate the need for any cut slopes or loss of natural landscape cover which substantially reduces the adverse visual impacts of project alternatives. That setback area can remain a common greenspace for the tract occupants.

The DEIR must include economically feasible DEIR alternatives that disturb no more than 15-acres of the site. To further reduce the visual intrusion of a development on the La Tuna Canyon Road scenic corridor and along rustic Tujunga Canyon Road, the project must provide a significant landscape buffer along both roadways, free of masonry walls or any non-see-through fencing. Coast live oak trees, native coffeeberry and toyon shrubs, and native cherry trees would be excellent natural landscape buffer elements along both corridors. Where sight lines are necessary to maintain visibility along roadways, native grasslands could be planted.

Need to Protect and Integrate Oak Trees

The 358 oak trees onsite provide both important habitat and give the site its unique character. The various economically feasible DEIR alternatives must integrate the permanent protection of the proposed oak trees to be cut down with the 229-unit project. At a bare minimum, permanent protection means leaving the oaks in an environment where they can remain in reasonable health. The proposed solid block of homes and streets must be broken up with ribbons of green that contain the subject oak trees to be one step above the bare minimum.

Need to Provide Buffer to Blanchard Canyon Flood Control Channel

The Blanchard Canyon flood control channel is a unique resource along the eastern property boundary. To maximize storm water cleaning capability, groundwater replenishment, and habitat creation, the County (5th District staff) has proposed to lay back a portion of the now angled flood channel walls to create a wider flood plain. The strip of land located at the north-eastern portion of the project site, wedged between Blanchard Canyon flood control channel and a pronounced hillside, would provide an excellent location for such channel modifications. The site provides a perfect set of conditions for such a project. In any case the project, and all DEIR alternatives, should be set back west of the flood control channel anyways to also provide a viewshed buffer along Tujunga Canyon Boulevard. This set back area should be made permanently available to the County for this type of watershed project.

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Importance of Trail Network

We also encourage all alternatives to maximize a network of hiking and equestrian trails on the site. Those trails should tie in as best as possible with existing, proposed, and potential trails. It is recommended that the Homeowner's Association (HOA) be irrevocably required to fund a portion of maintenance for designated open space areas via CC&R's. The open space areas without fuel modification should be dedicated to a public agency prior to map recordation. All buffer areas must also be subject to a conservation easement in favor of at least one public agency.

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

Sincerely,



RON SCHAFER
Chairperson