

SANTA MONICA MOUNTAINS CONSERVANCY

RAMIREZ CANYON PARK
5750 RAMIREZ CANYON ROAD
MALIBU, CALIFORNIA 90265
PHONE (310) 589-3200
FAX (310) 589-3207
WWW.SMMC.CA.GOV



January 11, 2016

Erin Strellich. City Planning Associate
Los Angeles Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, California 90012

**Recirculated Draft Environmental Impact Report Comments
Verdugo Hills Golf Course Project
SCH No. 2007121012**

Dear Ms. Strellich:

The Santa Monica Mountains Conservancy (Conservancy) offers the following comments on the above-referenced project that proposes 229 single family detached units on a 58 acre site located in the Rim of the Valley Trail Corridor Zone. The Conservancy submitted Notice of Preparation comments dated January 28, 2008 and Draft Environmental Impact Report (DEIR) comments dated July 27, 2009. No reference to either of these two documents appear in the new recirculated DEIR or its appendices. All future DEIR addenda or a Final EIR should address the fate of these two letters. Both are attached and incorporated by reference.

The Conservancy's July 27, 2009 letter supported a reduced version of Alternative 2 - All Residential Townhouses if six additional conditions were added. Alternative 2 was not modified in the current recirculated document and none of the Conservancy's recommended conditions were added to the project description or mitigation measures.

To date the range of DEIR alternatives is deficient because only one alternative has a meaningfully reduced project footprint (Alternative 2) and that alternative is comprised of wholly different project elements--meaning town houses versus single family detached units. We encourage the City to require another DEIR recirculation period with an alternative with a substantially reduced grading footprint that includes just single family detached units or said elements with some town homes mixed in to increase the total amount of housing provided. Decision makers must have access to the analysis of such a reduced footprint project that does not require a zone change and that avoids significant visual impacts.

Verdugo Hills Golf Course Project DEIR Comments

SCH No. 2007121012

January 11, 2016

Page 2

The recirculated DEIR concludes that the project would result in unavoidable significant adverse visual impacts. The proposed project would require a statement of overriding considerations. The project provides only upscale housing, no public trails, minimal groundwater recharge area, green house gas emissions from 96,000 CY of soil import and 360,000 CY of grading and recompaction, and requires a zone change. Where are the demonstrable public benefits to counter such impacts? The proposed open space offered to the public is not politically viable to build on and hence does not represent a major public land use concession by the applicant.

Why would any City with full discretion to deny the project (requires a zone change) first certify the EIR and second approve the project with significant visual impacts that can easily be avoided? The project does not exemplify the San Gabriel/Verdugo Mountains Scenic Preservation Plan Area intent.

A carefully crafted alternative using the footprint of Alternative 2 (minus the area between Tujunga Canyon Road and the Blanchard Wash channel) can produce such a project with approximately two hundred dwelling units and significantly reduced environmental impacts in virtually every Initial Study category. Such an alternative footprint would keep the golf course intact, require no permanent fuel modification of natural land, and maintain the option for a major riparian habitat mitigation and storm water infiltration project along the Blanchard Creek channel.

A well crafted reduced footprint project also would meet all of the applicant's stated DEIR project objectives. The DEIR did not rule out any of the existing DEIR alternatives as being economically infeasible. In any case for a project to avoid significant impacts, unproven economic infeasibility is not a valid reason to reject a DEIR alternative.

The recirculated DEIR concludes that the proposed project prior to proposed biological mitigation measures would result in significant biological impacts. However every single proposed biological mitigation measure falls into the category of a "during construction" avoidance action, careful ongoing brush clearance practices, or deferred streambed mitigation. There is zero DEIR analysis that addresses how the loss of over 35 acres of land now-accessible to Verdugo Mountains wildlife is mitigated by these impermanent mitigation measures.

The DEIR is also deficient for not addressing how the subject project area is the only contiguous natural path for wildlife to potentially transition from the Blanchard Creek channel into the Verdugo Mountains. The channel represents a potentially viable habitat linkage between the San Gabriel Mountains and the Verdugo Mountains.

Verdugo Hills Golf Course Project DEIR Comments

SCH No. 2007121012

January 11, 2016

Page 3

The DEIR circulated in July 2009 for the same project footprint concluded that the project would result in unavoidable significant biological impacts to trees for a period of ten years. The recirculated document does not draw the same conclusion and provides no rationale for such a change.

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