

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



May 23, 2016

Regional Planning Commission
Los Angeles County
320 West Temple Street
Los Angeles, California 90012

**Opposition to Aidlin Hills Project - Pico Canyon - PN 00-136
SCH No. 2014091027**

Dear Commission Members:

The Santa Monica Mountains Conservancy (Conservancy) finds that the Final Environmental Impact Report (FEIR) for the Aidlin Hills project remains grossly deficient in its conclusion that a wildlands project with over 1.4 million cubic yards of grading would not result in a single significant biological impact.

In the context of these deficiencies the County is limited to approving only the Environmentally Superior FEIR Alternative which is the "One Valley, One Vision Density Control Alternative." The Conservancy has no objections to this alternative project that per the FEIR meets 12 of the applicant's 13 project objectives and would result in no significant environmental impacts.

In regards to the 102-unit proposed project, how can a project that eliminates a minimum of sixty-six acres of Santa Susana Mountains core habitat via minimum of 1,400,000 cubic yards of grading not result in a significant biological impact? Sixty-six acres of undulating mountain and stream bottom topography with an elevation change of 350 feet jacketed by thousands of acres of public open space is not a run-of-the-mill suburban edge parcel map. It represents the total land form and drainage rearrangement of the lower Whickham Canyon watershed.

Why do the proposed FEIR biological mitigation measures not come close to mitigating this major intrusion into the Santa Clarita Woodlands? Because no combination of mitigation measures can offset the permanent destruction of 66 acres of natural land, fuel modification of 10 additional acres, and insertion of a lit up 102-acre subdivision into the subject habitat area that includes Conservancy-owned open space.

Regional Planning Commission
Aidlin Hills Project
May 23, 2016
Page 2

Yes, the proposed project would spare almost 160 acres of excessively steep land and plant two required mitigation oak trees. But not destroying adjacent land does not fully mitigate the biological impacts of the proposed project. The project still results in a net direct loss of at least 66 acres of habitat, the net indirect permanent disturbance of 10 additional acres from annual fuel modification, and the new permanent edge effects of a 102-unit housing tract in an otherwise natural canyon.

The multiple deferred FEIR biological mitigation measures that would enhance a small amount of onsite development-adjacent streambed and replant or relocate any found sensitive plants and animals do not offset the gross loss of habitat either. They are beneficial but they collectively do not mitigate the permanent loss or damage to 76 acres of core habitat to a level less than significant. The whole host of pre-grading FEIR biological mitigation measures also provide no offset. They just smooth the relocation experience for the permanently displaced wildlife.

The FEIR is fatally flawed to conclude that the proposed project with its FEIR biological mitigation measures would not result in even a single unmitigated significant biological impact.

Consider the CEQA precedent the County would set if it certifies the subject FEIR as now composed. Such an FEIR certification would verify that a habitat loss-to-habitat preservation ratio of 65:165, respectively, essentially offsets gross habitat loss impacts in a core habitat area. There is no scientific or factual support for that conclusion in the record. There is not even a marginal attempt in the record to explain how the protection of the subject land offsets the destruction of the subject natural resources that are integrated into a larger whole. The FEIR is totally deficient without such factual and site specific justification that the direct loss 66 of acres of habitat in the subject location is not a significant biological impact.

The County may conclude that the project's benefits warrant the permanent loss of 76 acres of core Santa Susana Mountains habitat but it must issue a statement of overriding considerations to do so. The County must re-circulate the FEIR and actually explain how the whole set of existing biological mitigation measures actually offset the substantial incremental loss and degradation of the Santa Susana Mountains ecosystem.

Regional Planning Commission
Aidlin Hills Project
May 23, 2016
Page 3

The Conservancy urges the County instead to approve the Environmentally Superior FEIR Alternative which is the “One Valley, One Vision Density Control Alternative” which based on the FEIR analysis would not result in any significant biological impacts. This project would construct 20 homes on 15,000-square-foot lots that take their primary access from an identified street stub in the adjacent Stevenson Ranch Phase IV housing tract.

The alternatives analysis dismisses this alternative because it does not include a secondary access road or large, high elevation water tanks for fire protection. However the FEIR includes no analysis or facts that show why this alternative would require those two missing project elements. The FEIR also includes no analysis or facts on why a reduced-scale water tank and emergency access road to Pico Canyon Road could not be added to this alternative.

The FEIR is further flawed because it deems the “One Valley, One Vision Density Control Alternative” as “not a fiscally viable project because the number of residential homes would be insufficient to offset the cost to construct the alternative.” Environmental Impact Report alternatives must by definition be feasible whether subjectively fiscally viable or not. The FEIR alternatives analysis is inadequate because it does not include any analysis or facts to support the conclusion that the environmentally superior alternative is not fiscally viable. Without such support the County must give equal consideration to the fact that the alternative is fiscally viable. The FEIR does not even include a graphic that shows the extent and layout of the “One Valley, One Vision Density Control Alternative” or any other alternative.

The FEIR also dismisses this alternative because it lacks “multiple fire protection measures to safeguard the Project and the existing adjacent residential community from wildfire hazards.” The FEIR does not explain what additional fire protection measures are and why they are needed from the subject project. The FEIR is deficient because it does not explain why the the existing adjacent residential community needs additional fire protection to the extent that it out of compliance with existing safety codes and standards. Adding a subdivision simply to protect another subdivision is ludicrous.

Regional Planning Commission
Aidlin Hills Project
May 23, 2016
Page 4

The Conservancy joins the California Department of Fish and Wildlife in urging the County to focus on the “One Valley, One Vision Density Control Alternative” to avoid significant biological impacts. That alternative meets all of the applicant’s project objectives with the exception of not supplying lots (102) of houses to meet housing need. The environmentally superior alternative supplies at least 20 homes to a region with over 15,000 approved and yet to be constructed homes. CEQA requires that the County avoid significant impacts if feasible.

The Conservancy asserts that the Green House Gas baseline used in FEIR analysis begins at too high of a level.

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

Sincerely,

IRMA MUNOZ
Chairperson