

SANTA MONICA MOUNTAINS CONSERVANCY

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January 26, 2015

Nick Hendricks
Department of City Planning
City of Los Angeles
6262 Van Nuys Boulevard, Suite 351
Van Nuys, California 91401

**Canyon Park Homes Project - ENV-2014-3225-EIR - Big Tujunga Canyon
Notice of Preparation Comments**

Dear Mr. Hendricks:

The subject 110-acre property is enveloped by public open space, recreational resources, and facilities. As stated in the Initial Study some needed utilities are located approximately 7,500 feet (1.4 miles) south of the subject property. It is remote from any intensive existing residential development. This remoteness and proximity to natural resources are reflected in a 2007 General Plan Amendment. There is no overriding consideration for the City to consider development at an intensity level greater than the existing General Plan and Zoning designations.

The Rim of the Valley Trail alignment (Graveyard Truck Trail) established by the State Legislature courses through the subject property. The property abuts 1,600 feet of designated Scenic Highway Corridor. It has 5,000 feet of interface with the Angeles National Forest. The property drains directly into a section of the Big Tujunga Wash Significant Ecological Area (SEA) with perennial flow and native fish populations. It is bisected by a USGS blueline wash tributary to Big Tujunga Creek.

Range of Alternatives

One Initial Study project objective is to initiate a zone change and another objective is to achieve a General Plan amendment, both to dramatically increase the allowed development density. It appears that any DEIR alternative that did not meet both of these two project objectives could be rejected in the alternatives analysis on the grounds that they did not meet one or two of the project objectives. For this reason the project objectives must be modified to allow for a full range of physically and economically feasible DEIR project alternatives.

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Any project on the site must protect the above-described unique set of surrounding public resources. As proposed, the 242 single-family dwelling project, and any development within that said project disturbance footprint, would result in unavoidable significant adverse biological and visual impacts to all of the above described public resources. The Draft Environmental Impact Report (DEIR) must include at least two economically feasible alternatives designed to avoid and minimize adverse impacts to all of the above mentioned public resources. The only impact avoidance shown by the proposed project is pulling grading back from the USGS blueline wash that bisects the site just to the CDFW jurisdictional limit which is only hydrologically based and not ecologically.

The attached figure shows the boundaries of a reduced impact development footprint that should be included in the DEIR. It is founded on a minimum 100-foot structure (including fencing taller than four feet) setback from Big Tujunga Canyon Road, a 100-foot northerly setback from the USGS blueline wash edge that bisects the site, a two-hundred-foot development setback from the Angeles National Forest boundary, and a variable approximately 125-foot setback from the Rim of the Valley Trail. It provides for two project entrance roads. The amount of dwelling units within this suggested footprint should be the maximum allowed under the existing General Plan designation with the Hillside Ordinance applied. If necessary, lot areas could exceed this development footprint, but no soil disturbance, animal keeping structures, or non-wildlife permeable fencing should be allowed outside of any portion of this depicted footprint.

All of the information in the Initial Study emphasizes that the General Plan and Zoning designations for the 110-acre site permit a maximum of one dwelling unit per 2.5 acres with a minimum 5-acre lot size. Essentially without a General Plan Amendment and Zone Change, it means the maximum allowable number of units is 22, assuming all 110 gross acres can legally be used for the calculation.

The DEIR must also include at least two economically feasible alternatives that require no General Plan Amendment and no Zoning change.

The DEIR must also include at least one economically feasible alternative that requires no General Plan Amendment and no Zoning change and no significant biological impacts.

Additional Issues

The DEIR must address how the site fits in with protected habitat for the California gnatcatcher.

The DEIR must address how the single proposed drainage detention basin would adequately filter out progressively accumulating pollutants from storm and nuisance runoff that would otherwise flow directly into a section of Big Tujunga Creek with year-round surface flow and different native fish species. Would the detention basin be allowed to vegetate with native wetland species or would it have to be periodically cleaned out? Would the clean out of native vegetation trigger permits from California Department of Fish and Wildlife? The Conservancy urges the City to suggest and require an over-sized detention basin that is scaled to function without any sediment removal and minimal vegetation removal just to ensure flows. It would be designed as a permanent wetland habitat feature.

The DEIR must address how the proposed open space would remain protected and properly managed, in perpetuity.

The DEIR must address how and where a public trail would be permanently dedicated to provide for a Rim of the Valley Trail segment through the property.

The DEIR must address when, how, and why the City of Los Angeles Department of Water and Power would grant an emergency access road easement to the project applicant.

Please direct any questions and all future documents to Paul Edelman, Deputy Director, at the above letterhead address or by email at edelman@smmc.ca.gov.

Sincerely,

A handwritten signature in black ink that reads "Linda Parks". The signature is written in a cursive, flowing style.

LINDA PARKS
Chairperson