

SANTA MONICA MOUNTAINS CONSERVANCY

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February 25, 2008

Christina Tran
County of Los Angeles Regional Planning Department
Impact Analysis Section
320 West Temple Street, Room 1348
Los Angeles, California 90012

Notice of Preparation Comments
Proposed Pacoima Wash Adjacent Surface Mining Project No. 01-154

Dear Ms. Tran:

The proposed project is located in a scenic, ecologically sensitive portion of the Conservancy's jurisdiction. The alignment of the Rim of the Valley Trail as shown in the Rim of the Valley Trail Corridor Plan approved by the State Legislature courses east to west through the center of the property. As stated in the Notice of Preparation this trail is also known as the Pacoima Canyon Trail. The Conservancy concurs with the Initial Study that the proposed project has a high probability of resulting in significant adverse ecological, visual and land use impacts.

Much of the proposed mining activity is proposed in a partially hidden tributary watershed of the Pacoima Wash. This hidden area is located mostly on APN 2581-005-007 which is the northernmost of the two subject parcels that total approximately 73 acres. The Draft Environmental Impact Report (DEIR) must include an alternative project that leaves the ridgeline on parcel APN 2581-005-008 entirely intact. The grading of this ridgeline would result in significant permanent watershed impacts. It will also eliminate the subject trail.

The DEIR must disclose if the subject owner controls any additional parcels in the vicinity of the proposed project. The DEIR should also include an analysis of the potential for additional mining activities that might be spurred by the approval of surface mining on the subject property.

All projects in the DEIR alternatives analysis must include mitigation measures both for interim use/realignment of the Rim of the Valley Trail and for a permanent mostly onsite alignment with grade and stability characteristics that are equivalent to, or exceed, those of the existing trail.

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The DEIR must address how vehicle traffic through and along an approximately one-mile-long section of the Pacoima Wash will affect the capability of that riparian and alluvial fan scrub community to support (nesting, roosting, denning, feeding) use by the full range of wildlife present in the canyon.

Our staff recently toured the section of Pacoima Wash adjacent to the proposed project. The existing and potential ecological value of this wash ecosystem is one of the most overlooked ecological areas in the County. The recreational and aesthetic value is also unparalleled. The DEIR should address what potential land uses could or are anticipated to be proposed between the public dam facility area and the first street bridge. The DEIR must address how the proposed project, and each of its DEIR alternatives, could have a negative impact on the future value of this wash area if it were to become public parkland.

Please direct any questions and all future documents to Paul Edelman of our staff at (310) 589-3200 ext. 128 and at address shown on the above letterhead.

Sincerely,

RONALD P. SHAFER
Chairperson