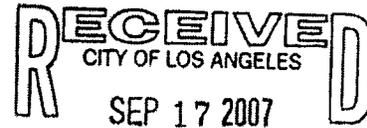


**SANTA MONICA MOUNTAINS CONSERVANCY**

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September 12, 2007



CITY PLANNING  
COMMUNITY PLANNING BUREAU

Mr. Jon Foreman  
City of Los Angeles  
200 N. Spring Street, Room 601  
Los Angeles, California 90012

**Notice of Preparation and Initial Study for Metro Universal Project  
SCH#2007061078**

Dear Mr. Foreman:

The Santa Monica Mountains Conservancy (Conservancy) has reviewed the Initial Study for the Metro Universal Project (Project) and has the following comments and recommendations for the Draft Environmental Impact Report (DEIR). The Conservancy is primarily concerned with potentially significant impacts to water quality, recreation, and the cumulative effects of transportation and circulation on cross 101-Freeway wildlife movement in the Cahuenga Pass.

The DEIR must include alternative project designs to mitigate significant impacts on water quality via storm water run-off. There must be a major biological storm water infiltration component to compensate for the significantly increased pollution load that is inevitable with a quantum increase in both use and traffic volume. The simple bioswales at the Chatsworth Metrolink Station are a good model to emulate; however, the Project needs a primary natural area many orders of magnitude greater in size. The Conservancy recommends a mitigation measure to construct a one-acre riparian habitat (one-acre includes upland buffer), as a means for storm water bioremediation and additional benefits such as habitat for birds and open space that provides public opportunity for passive recreation and urban relief.

Phase II, Option B, in the Initial Study states there may be a potentially significant impact associated with demand of local public parks and recreational areas due to an increase in housing and population. This one-acre riparian habitat area is thus essential to mitigate the demand impacts on public parks and recreation areas. The applicant can thus achieve mitigation for two types of impacts in one integrated facility.

The Project will drastically change the character of Weddington Park and surrounding neighborhoods with the construction of tall 24- to 34-story commercial buildings and significant traffic increases. Those changes include, but are not limited to, viewshed diminution and reduced availability of sunlight.

### **Cahuenga Pass Traffic Volume - Wildlife Movement**

The DEIR must analyze the Project's traffic impacts along the entire Cahuenga Pass corridor. Like Sepulveda Pass, Cahuenga Pass divides the Santa Monica Mountains creating a barrier for wildlife movement between the eastern Santa Monica Mountains and Griffith Park. Because of the proposed increase in traffic and vehicles within Cahuenga Pass, the Project's study area must include the Cahuenga Pass and analyze traffic flow throughout a 24 hour period. The major emphasis must be on the freeway overpasses used by wildlife at Mulholland Drive and Vine Street overpass. The cumulative traffic analysis must incorporate the Hollywood redevelopment project that is currently in process. The potential level of traffic between 10:00 p.m. and 5:00 a.m. that will result from the proposed level of development undoubtedly will significantly diminish the capability of these two overpasses to allow wildlife movement in and out of Griffith Park, the City's premier wilderness park.

As part of this analysis of traffic impacts on wildlife in the Cahuenga Pass, the DEIR should also analyze the additive adverse effects of increased light pollution from vehicles, street lighting, and all other ambient sources. Based on the opinion of most biologists the capability of wildlife to cross 101-Freeway in the Cahuenga Pass is already tenuous under existing conditions. Because of the projected volume from both the proposed project and the Universal City Vision Plan project major mitigation measures are required to prevent Griffith Park from becoming a biological island.

Short of creating a special wildlife movement structure over Cahuenga Boulevard and 101-Freeway, the only means to provide adequate wildlife movement conditions is to secure all necessary private and public land that connects the Mulholland bridge to protected open space both to the east and west. The most effective means of implementing this mitigation measure is to require an in lieu payment to the Mountains Recreation and Conservation Authority (MRCA) to be put into an escrow account to be used only for the acquisition of land that meets these specific objectives. Given the cost of real estate a fee of less than \$2 million would clearly be inadequate. The Conservancy's comments on the Universal City Vision Plan recommends a total amount of \$4 million fee for the combination of the two projects. In closer to an optimal world the fee should also include an additional \$1 million to be used for fiscal improvements that further improve the flow of wildlife movement to

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and across the Mulholland bridge. The absence of this complete mitigation package would result in an unavoidable significant adverse impact on intra-mountain wildlife movement in the Santa Monica Mountains.

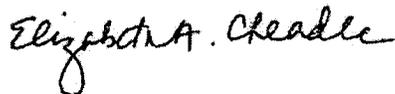
The importance of the Los Angeles River as a feature in the City increases every year. The banks of the Los Angeles River just north of the subject project most likely will be part of a vibrant multi-use recreational and habitat facility within 10 years. The DEIR must analyze and address both how the proposed project in each of its DEIR alternatives would potential degrade these resources and water quality in the Los Angeles River.

**Campo de Cahuenga**

The Conservancy recognizes the historical and cultural importance of Campo de Cahuenga. The Project will essentially surround the facility with tall modern buildings. The DEIR must thoroughly analyze how the cultural value of Campo de Cahuenga will be diminished being in a perpetual shadow. The feel and character of the site will be permanently altered. Traffic volume adjacent to the site will contribute increased rate in the ongoing degradation of this significant historical site. The Project must analyze the potential impacts of increased traffic volume on Campo de Cahuenga. In addition, the Project must include an analysis the potential impacts on the reduced public access to the site.

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

Sincerely,



ELIZABETH CHEADLE  
Chairperson