

**SANTA MONICA MOUNTAINS CONSERVANCY**

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September 22, 2008

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**Draft Environmental Impact Report for the Metro Universal Project  
(SCH No. 2007-2769-EIR) Universal City**

Mr. Foreman:

The Santa Monica Mountains Conservancy offers the following comments on the Metro Universal Project. The 14.43-acre project is located in a narrow strip of developed area between the Santa Monica Mountains and the Los Angeles River. The project will have a permanent effect on the aesthetic qualities of a premier City park with habitat value and a regionally significant historical monument, Campo de Cahuenga. The project will also have a direct bearing on traffic levels within the Cahuenga Pass wildlife corridor - the genetic lifeline to Griffith Park. Likewise, congestion and viewshed degradation will have adverse impacts from Mulholland Drive to the Los Angeles River. Thirty-six and 24-story buildings next to public parkland represent a drastic change in local land use that had not been contemplated by the General Plan

The Conservancy's NOP comments make a strong case for the inclusion of mitigation measures to benefit conditions for wildlife movement in the Cahuenga Pass and to permanently protect or create open space within a close radius of the project impacts. The Draft Environmental Impact Report (DEIR) includes zero mitigation for open space or conditions in the Cahuenga Pass. No traffic studies were done either to determine potential project impacts and mitigation measures for the Cahuenga Pass wildlife corridor. There is no mention of the Los Angeles River as a recreational resource either.

The proposed 70,000 square feet (20,000 of which would be private) of courtyard area does not constitute open space from either a natural lands or park perspective. How can this solve the City requirement for open space when the project would convert 10 acres of structure free area to multi-story buildings?

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The DEIR shall remain deficient for not adequately mitigating both direct and indirect impacts to open space. As stated in our NOP comments, adequate mitigation must come in the form of a natural area onsite with a portion of wetland habitat which would compensate for adverse effects on the natural ambiance of Weddington Park. The whole project requires extensive permanent dewatering. The impacts of this dewatering on local springs has not been addressed in the DEIR. Will it effect the spring studied by the MTA at the southern terminus of Lankershim Boulevard? To compensate, the pumped water should be used to produce and maintain a thriving onsite wetland habitat.

In addition, a mitigation measure that prevents the deterioration of wildlife movement conditions in the Cahuenga Pass is critical to compensate for significant additional traffic levels. As outlined and supported in detail in our NOP comments, the most effective means of achieving that mitigation, without requiring an applicant to acquire private land for public purposes (wildlife corridor and viewshed), is to provide funding to the Mountains Recreation and Conservation Authority (MRCA). The mechanism should be an in lieu fee payment to the MRCA to be put into an escrow account to be used only for the acquisition or improvement of land that meets these specific habitat linkage objectives in the Cahuenga Pass by the Mulholland Drive bridge.

Additional design changes that would reduce impacts on public open space, include placing all the Site B buildings and putting them on Site C. The FEIR should include this configuration as a project alternative.

Please direct any questions or future CEQA documents to Paul Edelman, Deputy Director for Natural Resources and Planning at the above address and by phone at (310) 589-3200 ext. 128.

Sincerely,

RONALD P. SCHAFFER  
Chairperson

cc: State Clearinghouse