

SANTA MONICA MOUNTAINS CONSERVANCY

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June 26, 2006

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Project Additions to Tract Map No. 35022

Ms. S. Gail Goldberg and Mr. Lemuel Paco,

Tract Map No. 35022 provides for 24 homes in the El Sereno, Elephant Hill area of Northeast Los Angeles, with a project area of approximately 15 acres. Recent grading plans in the City files show a greatly expanded footprint that exceeds limits addressed in the Final Environmental Impact Report (FEIR).

If the grading footprint has been substantially expanded beyond the limits in the FEIR, a revised California Environmental Quality Act (CEQA) review is lawfully required.

Tract Maps in the file dated February 2, 2006 and March 1, 2006 clearly show an expanded project area that has never been contemplated during the project's public review process. Specifically, the more recent maps show the construction of Pueblo Avenue, re-alignment of Pullman Street, and a longer extension of Pullman Street than previously indicated. The proposed grading required to build Pueblo Avenue is substantial, and the impacts to biological resources and aesthetics cannot be considered insignificant without public review.

Neither the construction of Pueblo Avenue or the additional extension of Pullman Street appears to be necessary to build the proposed project. In addition, the newer maps include a dashed line that would connect Pullman Street to a new extension of Drysdale Avenue.

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These facts suggests that the Applicant intends to expand the project area even more with future development. It is not permissible in CEQA to segment a project in order to avoid full disclosure of environmental impacts.

The Conservancy requests that the City provide a response addressing the concerns addressed in this letter. Please direct the response and any questions and future correspondence to Paul Edelman of our staff at (310) 589-3200 ext. 128.

Sincerely,

ELIZABETH A. CHEADLE
Chairperson

CC: Gregg Vandergriff, P.E.