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February 27, 2017

Ms. Karen Hoo
Environmental Review Section
Department of City Planning
200 North Spring Street, Room 750
Los Angeles, California 90012

**The Abode at Glassell Park Project, ENV-2015-2354-EIR
State Clearinghouse Number 2015101077**

Dear Ms. Hoo:

The Santa Monica Mountains Conservancy (Conservancy) offers comments and recommendations on the Draft Environmental Impact Report (DEIR) for the above-referenced subject proposed multi-residential project in Walnut Canyon. The Conservancy previously commented on the Notice of Preparation for the subject DEIR in our letter dated December 14, 2015. As stated in that letter, the subject project is the most environmentally impacting project proposed in the North East Los Angeles hilltop areas in the last twenty-five years.

The natural lands complex south of the 134 freeway between the Los Angeles River and the Arroyo Seco currently possesses sufficient area and connectivity to support a small bobcat population along with numerous other mammals and birds. The subject project, as currently proposed, will significantly adversely impact the ecological carrying capacity of these interconnected habitat blocks. The DEIR fails to address these impacts, and is deficient under the California Environmental Quality Act (CEQA) for multiple errors and omissions.

The DEIR erroneously classifies the subject proposed project as “infill”. The subject property is adjacent to approximately 7.9 acres of contiguous undeveloped private open space to the south, which is zoned as RE 20 and RE 40, for very low-density residential development, or for future parkland. The considerations normally given to a true residential infill project are simply not applicable to this project.

Ms. Karen Hoo
Department of City Planning
The Abode at Glassell Park Project, ENV-2015-2354-EIR
February 27, 2017
Page 2

The DEIR's analysis of Biological Resources mis-classifies the subject property's environmental setting in its discussion of wildlife connectivity when it describes the subject site as "isolated". The site is located approximately one-half mile from Heidelberg Park to the east, and approximately one-half mile from Elyria Canyon Park to the south, both publicly-owned parks. Several public open space properties, owned and maintained by the Mountains Recreation and Conservation Authority, are located within approximately one-third of a mile to the west and south. A simple qualitative spatial analysis using publicly available aerial photographs (including the City's online Zoning Information and Map System) would be enough for the lay person to determine that connectivity for wildlife movement exists between the subject property and nearby surrounding open space.

The DEIR's Alternatives section fails to include an adequate range of project alternatives. And adequate discussion of alternatives would, by necessity, include alternatives designed to maximize habitat protection within both the subject property, and to minimize indirect impacts on adjacent private open space.

The Conservancy's recommended alternative, illustrated on the attached site plan diagrams (overlain on Figures 2-5 and 6-2 from the subject DEIR), would create permanently protected open space habitat on the southern end of the site, abutting the aforementioned sequence of RE 20 and RE 40 lots. A project configuration with this onsite open space buffer would be environmentally superior to a project plan that would place a number of small lots with dense housing adjacent to a large swathe of private open space.

The subject proposed project will not be compliant with CEQA unless it includes permanent meaningful onsite open space protections in this location to maintain habitat block biological carrying capacity.

If you have any questions for our agency, please contact Paul Edelman, Deputy Director of Natural Resources and Planning, at 310-589-3200, ext. 128, or by e-mail at edelman@smmc.ca.gov. Please send future notices regarding the subject project to the above letterhead address, Attention: Paul Edelman. Thank you for your consideration and the opportunity to comment.

Sincerely,

IRMA MUÑOZ
Chairperson

Ms. Karen Hoo
Department of City Planning
The Abode at Glassell Park Project, ENV-2015-2354-EIR
February 27, 2017
Page 3

Attachments: A - Conservancy's Minimum Permanent Protected Open Space
 diagrams