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Agenda Item 13(a)

SMMC

12-11-2017

July 9, 2015

Mr. Marc Woersching
Deputy Advisory Agency
City of Los Angeles
6262 Van Nuys Boulevard, Room 351
Van Nuys, California 91401

Hidden Creeks Estates Project - SCH No: 2006031049
VTT-68724 / ENV-2005-6657-EIR / ZA-2013-4153-CU-ZAD

Dear Mr. Woersching and Advisory Agency Members:

As the principal State planning agency for the subject area, the Santa Monica Mountains Conservancy (Conservancy) offers the following additional comments on the above-referenced project proposed in the core habitat area of the Santa Susana Mountains. For reasons contained within this letter, and all the Conservancy's letters to date, the Vesting Tentative Tract Map (VTTM) must be revised and the Final Environmental Impact Report (FEIR) cannot be certified.

The proposed project is without question the most biologically damaging development project ever commented on by the Conservancy in the Los Angeles River watershed. The proposed project would result in unavoidable, regionally significant, adverse biological, visual, and green house gas emission impacts. The project is an abject failure in regards to the City's new biodiversity initiative.

The EIR is deficient as it has failed to acknowledge the project's impact on habitat connectivity as shown in the California Essential Habitat Connectivity Project (CEHCP). The project site is located directly within a quantified essential connectivity area and is a key component for maintaining connectivity between large blocks of habitat. The CEHCP is a transparent scientifically-defensible and repeatable assessment of essential habitat connectivity that cannot be ignored.

The Planning Commission recommendations on the proposed project are flawed because time will show that the trail locations and limits of grading depicted on the VTTM and in the EIR are inadequate. The required changes in the trail locations and

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limits of grading will require modification of the VTTM and the EIR. In such case the Planning Commission must again reconsider the EIR.

The Applicant has no Legal Access – Gift of Public Funds for City to Provide Free 9-10 Acres for Grading

Currently the 285-acre Hidden Creeks property has no legal access. The legal access of Mountain Meadows is prescriptive and not deeded. The applicant acquired a property without access at its own risk. As laid out by the applicant's project and the EIR, and as pushed by the City, the City is partnering with the applicant to provide such access (Mason Avenue extension) at public processing (staff time) expense and future road maintenance expense. Similarly the City is partnering with the applicant to provide land rights essential to the Hidden Creeks project from the open space land it will soon be offered from Tract 50505. That open space land from Tract 50505 is a public asset even though it has not yet transferred to City ownership. In our staff discussion with a representative of Toll Brothers, Inc. it was made crystal clear that Toll would offer the subject approximately 80 acres to the City as required by its Porter Ranch entitlements.

To provide a minimum of 9-10 acres of that public asset to a private developer, with no monetary compensation to the City for the land itself, is a gift of public funds. The City may only intend to deed a permanent easement to Hidden Creeks, but with a grading and slope easement, Hidden Creeks derives all the value of a fee simple gift from the City. It is improbable that the City would grant a temporary easement because the minimum 9-10 acres would be covered with a concrete drainage ditch system that conveys water directly into Mormon Creek. The City generally does not take responsibility for HOA-owned manufactured slopes.

The City cannot delay addressing this issue after the Hidden Creeks EIR by saying it will deal with the issue when the ownership of Tract 50505 offers the subject approximately 80 acres to the City. The recordation deadline and Development Agreement deadline for Tract 50505 would most likely occur prior to Hidden Creeks obtaining any permission to grade. Most likely the Hidden Creeks EIR and VTTM will be recirculated followed by potential legal action that would further delay any development of Hidden Creeks.

The chain of events for that 80 acres can only take three paths. The most probable path is that the land is offered to, and accepted by, the City, and the City then grants an

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easement to Hidden Creeks if the project is still viable. Secondly, the City could decline the offer of dedication and then provide cover to the owner of the Tract 50505 open space lot to grant an easement to Hidden Creeks. In which case either the HOA keeps the open space lot or it is subsequently offered to a public agency burdened with the Hidden Creeks easement. The last and preferred option is that the City declines the offer of dedication and allows another public agency to accept the land unburdened by any grading and slope easements to Hidden Creeks. Under that scenario the City is not put in a position to offer a gift of public funds.

The EIR is flawed for omitting any mention of the fact that the City's potential actions on this open space issue can turn an inexpensive single large parcel fraught with landslides into a 188-unit luxury subdivision. The value of the City's potential "gift of fund" is in the millions of dollars.

Proposed Hidden Creeks Grading on Tract 50505 Would Irreversibly Degrade Public Resource

The EIR is deficient because it does not address how the proposed Hidden Creeks grading on the Tract 50505 future City open space parcel would degrade the ecological, visual, recreational, and watershed value of the remainder of the parcel not impacted by Hidden Creeks related activities. It does not address potential visual impacts on views from the existing trail that goes up the bottom of Mormon Canyon or from the future "Horse Flats" Department of Recreation and Parks trail along the outer edge of the Tract 50505 development area. Both trails would look directly at the proposed 9-10 acre graded slope.

It is hoped that natural slopes without concrete drains and sprinklers are the preferred ambience of open space trails contrary to the pitches of Hidden Creeks advocates. In contrast, the City's future open space parcel with a minimum of 9-10 acres converted to manufactured slope (90 percent level of soil compaction) would not come close to offering the watershed or ecological values of the current natural conditions on those 9-10 acres. Other parts of the record provide substantial evidence to support this statement.

The City and Hidden Creeks may contend that because a part of the approximately 80-acre future City open space parcel from Tract 50505 will already have approximately 5-6 acres of graded or manufactured slope via the development of that tract that, the 9-10

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acres of permanent Hidden Creeks impacts would not cause any impacts. Pre-existing permanent adverse impacts do not justify new, nearby avoidable permanent impacts. The opposite is more the case. The Tract 50505 open space will already have a non-natural area and thus more grading will be a cumulative adverse biological, visual and watershed impact.

The City's description that the Tract 50505 open space lot needs to be "in a substantially natural condition" is most logically associated with an accommodation for the above described graded slopes from Tract 50505 itself, not an allowance for an offsite property to grade on future City open space. That logic is accentuated by the fact that any offsite-project-caused grading on the open space would unequivocally induce millions of cubic yards of grading and suburban development next to the Tract 50505 open space. Any offsite caused "substantially natural open space" on the Tract 50505 open space would be the trigger to cause orders of magnitude greater biological, watershed, greenhouse gas, and visual impacts on the remainder area and beyond. Those impacts would adversely affect the intended, and City-conditioned, open space values of the Tract 50505 open space.

The EIR is deficient for not addressing the background and conditions associated with this Tract 50505 open space because it is an essential component of the Hidden Creeks project. The proposed project would set a poor precedent of a City offering up existing natural mitigation land to a private entity to foster otherwise impossible significant biological and visual impacts.

Proposed Fencing to Protect Riparian and Other Habitat

Another deficiency in the EIR regarding the Tract 50505 open space is that the EIR mentions that fencing will be needed to protect riparian areas. The EIR language is ambiguous about whether fencing associated with Hidden Creeks is contemplated within the Tract 50505 future City open space lot. Any fencing within that said lot would be contrary to a substantially natural condition. Such fencing would also exclude public access from public fee simple land.

The EIR does not make the case why fencing would be needed to protect riparian resources in any portion of Mormon Creek downstream of the proposed Mason Avenue bridge. Any fencing on the proposed manufactured slopes above and along Mormon Creek would have a negative affect on wildlife movement. The fencing thus negates the

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EIR's repeated claims that compacted, manufactured slopes, with concrete ditches, and nursery container sized trees have greater ecological value than established native slopes with mature trees, percolating soils, and rich soil biota. Such fencing would also be in conflict with the VTTM's trail alignments.

SoCal Gas and the PUC

The EIR is deficient for not addressing what compensation the Southern California Gas Company would receive for allowing 50 acres of mass grading and the deeding of an undefined road easement to the City of Los Angeles? What would be the source and timing of such compensation? The EIR is deficient for not addressing if the Public Utilities Commission needs to do its own environmental analysis prior to consideration of granting permission to the gas company to grant such growth-inducing easements.

How Can an EIR be Certified that Does Not Analyze the Vegetation to be Destroyed on 9 -10 Acres of Future Public Open Space from Adjoining Tract 50505?

The DEIR (Figure IV.C-1), FEIR, and all supplemental EIR documents do not contain vegetation mapping for the 9-10 acres of proposed grading area with adjacent Tract 50505 in Porter Ranch. Nowhere in those documents are the different habitat types and their locations within the 9-10 acres included. For all intents and purposes those 9-10 acres are missing from the impact analysis. The EIR is deficient for excluding this information. The EIR is deficient for not showing the boundaries of the habitat types that are proposed to be eliminated in the greater Mormon Creek riparian corridor.

Trail Constructability Not Adequately Demonstrated

The EIR is deficient because it shows required public trails traversing and cutting across manufactured slopes with steepness as great as 2:1. The EIR does not explain or analyze how a horse trail wide enough for two horses to safely pass can be cut into a manufactured slope with v-ditches, bench drains, and down drains. Such trail construction could have a permanent adverse impact on slope stability, drainage, and erosion. The grading plan does not show all of the cut and fill necessary to create the proposed trail plan. Without such a moderate detail plan, decisionmakers and the public cannot ascertain the project's potential impacts and feasibility. Likewise the impacts of the construction cannot be analyzed and thus be understood.

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Permanent, Originally Contemplated, Essential Grading is Not Temporary and Remedial Grading

The EIR and VTTM are flawed because they repeatedly refer to the grading of 50,000 to 250,000 within the future City open space lot from Tract 50505 as temporary, remedial grading. Any EIR and VTTM proposed grading in Tract 50505 as depicted in those documents is permanent grading. That shown grading is part of permanent slopes that were contemplated in the DEIR and all subsequent CEQA documents. The claim that it is remedial grading for landslide conditions is true of 80 percent of the proposed project's required 7 million cubic yards of grading. It is a deliberate deception to label the offsite grading on Tract 50505 as remedial grading. It has no distinct difference from the remainder of the project grading except that it is located offsite on property not controlled by the developer. This use of terms is a key misrepresentation in the EIR and VTTM.

The EIR and VTTM include numerous figures that show small amounts of grading on Tract 50505 that extend beyond the apex of the Mormon Canyon stream bottom. More specifically, portions of the toes of fill slopes extend over the low flow line shown on the relevant topographic base maps. The EIR and VTTM are grossly deficient because they do not analyze the grading required to construct the keys for the proposed fill slopes into natural terrain. In other words large fill slopes do not magically end on the surface at clean perfect lines inches from jurisdictional stream habitat. The creation of the fill slopes shown in the EIR and VTTM require substantial grading, disturbance, and excavation beyond the toe of slope lines shown in all of the EIR and VTTM figures. The construction of fill slopes requires large equipment to turnaround and maneuver just outside of the grading limits. Material would also roll down the slopes into the creek bottom.

The proposed continuous fill slope within Tract 50505 is thousands of feet long and hundreds of feet tall. To establish a key for a manufactured slope of this size, a substantial-sized area needs to be excavated to a substantial depth to competent geological material. That excavation must extend outward away from the shown EIR and VTTM limits of grading. As shown the grading plans would require the establishment of keys both on steep slopes and on the floor of the Mormon Creek channel. In short, the limits of grading associated with Hidden Creeks within Tract 50505 are misrepresented and deceptive.

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The EIR Supplement was candid and mentioned that it might not be possible to hold the limits of grading shown on the EIR and VTTM in Mormon Creek. It is a fact not disclosed by the EIR that the project cannot stay within its shown limits of grading adjacent to Mormon Creek within Tract 50505. There are huge impact escalation factors associated with such grading footprint expansion.

Substantail Evidence Points to a Default Direction to Have to Grade Mormon Creek

It should first be noted that the espoused “environmental sensitivity” of the project is founded on minimal (less than five acres) impacts to jurisdictional and riparian habitat in Mormon and Browns creeks. Furthermore, multiple EIR biological mitigation measures are founded on a specific (reduced) level of impacts to jurisdictional riparian habitats. These reduced riparian impact levels and totally undefined deferred riparian restoration in the mitigation measures are claimed as necessary to eliminate unavoidable significant adverse biological impacts.

The intention of the EIR flavor is to assure the reviewer that the project would not adversely impact the Mormon Creek riparian corridor. The EIR actually repeatedly states and justifies the project by saying that “fixing” the 165-acre ancient (not active) landslide that terminates along Mormon Creek will improve the quality of the riparian habitat. Sadly this claim of being able to do artery surgery with a blunt axe can no longer be supported. The 7 adjacent million cubic yard earthen band aid compacted to a level of 90 percent cannot heal what would be an inevitable level of mass grading in Mormon Creek itself.

An analysis of the EIR and VTTM reveal substantial evidence that the project would result in substantial additional grading within Mormon Creek and jurisdictional area. This additional surface and excavation impact would result in unaddressed significant biological impacts within the most ecologically significant area of the whole 235-acre grading footprint. If mass grading into hundreds of feet of rare, perennial, blue-line stream in core habitat is not an unavoidable significant adverse biological impact, then we respectfully request that City describe what level of impact would constitute an unavoidable significant adverse impact on the project site?

A recirculated EIR must address how graded fill slopes can terminate in the low flow zone of Mormon Creek without needing armoring

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The EIR is further flawed for not addressing the potential geomorphological, hydrological, and ecological impacts of half a dozen dissipators proposed to be located within or at the edge of the Mormon Creek low flow channel. Would step be required to maintain them? How could they not exacerbate erosion in subject portions of the creek?

Public Staging Area Grading Enters Mormon Creek

On various sheets of the VTTM, the apex of the low flow channel of Mormon Creek is shown to be impeded by proposed fill slopes for the proposed public staging area. The EIR is deficient for not addressing and explaining this inconsistency. The evidence shown to the public shows that either a fill slope will be constructed in the bottom of the streambed or that the public staging area must be smaller than shown and require the construction of a key on a steep slope.

Post-DEIR Unpermitted Mountain Meadow Stream Construction and Pasture Areas

The one sheet of the VTTM that shows the fine detail of the proposed new equestrian center shows that an existing road culvert-with-fill crossing of Mormon Creek and three well-defined, rectangular pasture areas (X, Y and Z) would be part of the new project. The Conservancy could not find any records that the stream crossing was permitted by the California Department of Fish and Wildlife, the Regional Water Quality Control Board, or the Army Corps of Engineers. The crossing completely changes the hydrological dynamics of Mormon Creek, a USGS blue line stream. This stream crossing was never addressed under the California Environmental Quality Act (CEQA). The stream crossing should not be included in the project baseline condition and must be analyzed in the EIR. Based on Google Earth photography the access road and filled stream crossing were installed between 2009 and 2011.

The EIR vegetation map (Figure IV.C-1) shows all of the proposed pasture area on the south side of Mormon Creek as oak woodland. Google Earth 2007 photography shows no bare ground in the whole pasture area and no structures. Significant physical change has occurred since that time with a progressive loss of vegetation, increased fencing, multiple structures beginning in 2013. When the Draft EIR was released in 2008 much of the pasture area, which is much greater in size than what is represented in areas X, Y and Z, was clearly vegetated – enough so that the EIR mapped it all as oak woodland. Only scattered oaks remain today. Both unpermitted development and vegetation loss

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have occurred in the project area since the Draft EIR was released. Google Earth May 2015 photography shows a 440 by 150-foot area of absolute bare ground. That bare ground area is almost 1.5 acres in size within a Final EIR depicted area of oak woodland. Much of the above described vegetation loss and soil disturbance occurred within the Mormon Creek flood plain and within 25 feet of the edge of the Mormon Creek riparian corridor canopy. The impacts of this “pasture” development and disturbance south of, and crossing, Mormon Creek that occurred since the Draft EIR was released was not addressed in either the Final EIR. The EIR is deficient for this omission.

The EIR analysis of wildlife movement in Mormon Creek connecting to Browns Creek contains no reference to actual wildlife corridor width, topographic constraints, or actual elevation differentials between proposed houses and facilities and actual potential wildlife movement pathways. The document just single handedly concludes that the project will not have an adverse effect on wildlife movement because of the elevational difference between the bottom of Mormon Creek and proposed houses. That analysis is flawed because much of the bottom of Mormon Creek contains steep eroded walls and heavy vegetation that are not conducive to unrestricted wildlife movement.

This analysis is further flawed because it fails to factor in the extensive existing development, cleared vegetation, fencing, and interrupted stream flow in the pasture area that occurred after the the Draft EIR was released. That development is in a critical wildlife corridor pinch point between the existing Mountain Meadows equestrian facility and the full future build out of Porter Ranch. The EIR is deficient for not addressing how the proposed project would reduce the width of this choke point and is further deficient for not addressing how the post Draft EIR-release development and disturbance could futher degrade wildlife movement capability in this area. The EIR calculations for impacts to both riparian and woodland habitats are thus also inadequate.

The City has full rights to accept the required approximately 80-acre Porter Ranch open space dedication next to the Hidden Creeks property. If the City declines to accept that open space dedication, it must be offered to other suitable public agencies. Given the Planning Department’s, Planning Commission’s, and 12th District Councilmember’s clear cut support for the project, it is safe to assume that the City will accept fee title to the 80 acres. Although not analyzed in the FEIR, it is now out in the open that in order for the project to occur (as proposed) almost a quarter million cubic yards of grading

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must occur on over nine acres of City-owned, fee simple protected open space. All of that nine-plus acres of graded and filled land would be manufactured slope with artificial, permanent surface drainage systems. The EIR is silent on which party would own the manufactured slopes within the described Porter Ranch open space dedication. However, the VTTM clearly shows (labels) the subject area as future City open space.

Proposed Mason Avenue Extensions Issues

All of the runoff on the portion of Mason Avenue proposed in the Mormon Canyon watershed would flow directly into a perennial section of Mormon Creek. This potential road run off contamination into the creek must be better mitigated.

The EIR is inadequate because it fails to recognize, disclose, or provide for a trail crossing at the beginning of the Mason Avenue extension. There is an existing trail to the east and a planned one to the west. The safety of trail users and road improvements has not been addressed.

The large scale wastewater pump station proposed by the Mason Bridge must be better defined in the EIR. The visual impacts and affects on trail crossings must be better analyzed.

The EIR is deficient because it fails to address the down cut status of Mormon Creek by the proposed Mason Avenue bridge. The project calls for multiple storm water energy dissipators to be located around the Mason Avenue bridge. These water input sites could exacerbate the significant erosion problem now caused by multiple sources including concentrated cattle grazing. The applicant allows cattle unfettered access to the bullrush – black cottonwood spring area identified as the most sensitive onsite wetland resource in the EIR.

Mormon Creek and Browns Creek Bridge Area

The VTTM shows a tight, poorly defined convergence of the proposed equestrian center access road, the debris basin, and Mormon creek all in the same place. The proximity of the road and the creek without elevation and armoring details to analyze is an EIR deficiency. The pump station at confluence of Browns and Mormon creeks is not defined well enough to analyze the impacts either.

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Representation of 123 Acre Open Space Area is Inaccurate

The open space lot 191 is only 105 acres. Twenty acres are in permanent fuel modification. Five acres have permanent drainage structures. The amount of permanently protected natural open space is less than 100 acres.

MRCA Easement through Proposed Park Site

The MRCA has owned the 80-acre Jane M. Pinkerton Trust property that abuts the northern project boundary for over one year. The EIR should recognize that the MRCA has a 20 foot non-exclusive easement through the proposed park site leading to the subject MRCA land.

Mountain Meadows Value

Based on public hearing testimony, Mountain Meadows in its current state provides excellent resource for its private clients. Why does it need to be rebuilt and leave its clients with no services for over a year? The condition that allows the facility to covert to residential estates in 20 years does not serve the public interest.

Visual Impact Analysis Incomplete

The EIR visual analysis assumption that the project site cannot be seen from lower elevations is flawed. North bound on De Soto Avenue the project can be seen from the Ventura Freeway, Saticoy, Roscoe, Chase, Parthenia, Nordoff and Lassen. The signature circular olive grove and line of orchard trees is totally visible. We have recorded pictures of the visibility from each of these locations. Street view on Google Earth from these locations also shows their visibility from this major public thorough fare.

The visual analysis is further flawed because it fails to analyze if the proposed million gallon water tank will be visible from any portion of Mason Avenue.

Contamination of Green Ranch Wells from Hidden Creeks Main Retention Basin

Los Angeles County Parks and Recreation now owns the Green Ranch that abuts the southern boundary of the project area. The Hidden Creeks infiltration basin would

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concentrate the run off from 188 homes, the street system, and the new equestriac center a few hundred feet north of the wells used for drinking water on the ranch. The EIR provides insufficient analysis on how the concentration of chemicals and hydrocarbons from this basin will not be released into an infiltration zone directly above these now public wells.

Inadequacy of Riparian Habitat Biological Mitigation Measures

The EIR concludes that ecological value or ecosystem contribution of riparian habitat destroyed by the project in particularly ecologically rich parts of Mormon Creek can be mitigated by the future creation or restoration of riparian habitat in some undefined location at some undefined (deferred) time. That is an unsupported assumption because the EIR does not at all document the ecosystem contribution or proximity of each impacted patch of habitat. The EIR cannot thus conclude that the project impacts to jurisdictional, riparian, and wetland habitat can be mitigated below a level of significance.

The EIR biological impact conclusions are founded on the assumption that remaining riparian and jurisdictional habitat that becomes permanently subjected to proximate residential development and street traffic would not decline in its ecosystem contribution value. This is a false assumption. The perennial section of Mormon Creek as it sits today in a fully wildlife accessible condition is an unparalleled ecosystem component. Post-project it would be adjacent to a lit four-lane street, a million cubic yards of fill, fencing, a sewage pump station, a park, and houses. These encroaching and degrading impacts to the highest quality year-round water source on the south slope of the entire Santa Susana Mountain Range, is an avoidable significant impact. However the project would not avoid it, and offers no mitigation for its wholesale degradation. The only riparian mitigation offered by the EIR is to restore habitat in unknown offsite locations and unknown times.

The EIR is further deficient because it does not provide mitigation for the temporal loss of this water source to wildlife for miles around during construction. If the only available water source for two miles in each direction is surrounded by a million cubic yards of fill and large earth moving equipment, that is a significant biological impact that remains unmitigated.

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In general the EIR analysis on impacts to habitat within and surrounding the proposed project is fatally flawed. The primary source of this deficiency is a total absence of the recognition of Mormon Creek as a wildlife water source. This absence is compounded by no additional analysis of any other nearby water sources for wildlife during the driest times of year and in severe drought conditions. The reason for this absence of study is that it would reveal that a project with the four lane Mason Avenue extension and a park right next to the perennial stream produces unavoidable significant biological impacts to the most important water source on whole southface of a mountain range.

The other general analytical flaw is that the EIR contends that animals will easily adapt to reduced access to this water source. How can this be if the access routes are squeezed down to narrow slivers of habitat in proximity to roads. Perhaps the most grossly deficient omission of the EIR is that the subdivision would create 165-acre block on the west and north sides of Mormon Creek. The Mason Avenue extension would bisect the eastern approach to the creek. The gas company is requiring a fence along Mason Avenue to keep people off the gas company land. Lastly the project requires permanently placing one million cubic yards of fill on both sides of the wettest part of the creek. Essentially that would limit wildlife access to this regionally significant year-round water source to just ten percent of the current level of access. That reduction is an unavoidable significant adverse impact to the carrying capacity and health of virtually all mammal species in the Los Angeles River watershed portion of the Santa Susana Mountains. The EIR contains not a drop of a mitigation measure to address this substantial evidence.

Mormon Canyon Watershed a Separate Natural Area

The Mormon Canyon watershed is one hundred percent topographically separated from Porter Ranch. Large ridgelines separate them. The EIR fails to address that the proposed project cuts an unprecedented deep pass between two major watersheds to allow for a four land road. Trail users in Mormon Canyon currently see no development. The proposed project would totally transform a separate natural watershed into a large standalone suburban neighborhood. This transformation and degradation of a unique scenic resource is a significant avoidable impact if the project is reduced in scale. However the impact remains unmitigated in the EIR.

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Issues Not Addressed in EIR

The EIR is deficient for not addressing construction traffic impacts on Browns Canyon Road and how it would affect trail, recreational safety and visitor experience and wildlife road kill potential.

The EIR is deficient for not addressing when and how Browns Canyon Road would be repaved and repaired during and after construction.

The EIR is deficient for not addressing the potential impacts of the proposed helicopter pad.

The EIR is deficient for not addressing how the adjacent gas storage fields – with both the above and below ground components – may pose safety impacts to Hidden Creeks residents.

If the proposed one million gallon water tank would have been part of the Porter Ranch project even if Hidden Creeks was not proposed the added fire fighting value of Hidden Creeks is greatly diminished.

The EIR is deficient for not addressing the potential for future oil and gas drilling anywhere near the proposed project.

The EIR is deficient for not providing explicit geologic proof that a portion of the 165-acre central landslide cannot be remediated to allow for approximately the western 2/5ths of the project to be constructed. The geological analysis is slanted to emphasize that total 165-acre landslide remediation is the only course of action. Because of this bias, the range of EIR alternative projects remains deficient.

The EIR is deficient for not addressing or acknowledging the City of Los Angeles produced Guide to Existing and Potential Equestrian Trails in the 12th District which includes trails within and adjacent to the proposed project.

I submit these comments on behalf of the Conservancy and the people of the State of California as an expert biologist with an uninterrupted 25 year span of experience studying the portions of the Santa Susana Mountains in the Conservancy's jurisdiction.

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Sincerely,

A handwritten signature in blue ink, appearing to read "Paul Edelman", is centered on the page. The signature is fluid and cursive, with a long horizontal stroke extending to the right.

PAUL EDELMAN
Deputy Director
Natural Resources and Planning