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City of Los Angeles
200 North Spring Street, Room 750
Los Angeles, California 90012

ENV-2005-6657-EIR / SCH No. 2006031049
Hidden Creeks Estates Project - Mormon and Browns Canyons

Dear Ms. Pearson:

The Santa Monica Mountains Conservancy (Conservancy) continues to oppose the subject Hidden Creeks Estates Project, which proposes 188 single-family luxury gated residences in the core habitat of the Santa Susana Mountains. The above-referenced Revised Draft Environmental Impact Report (RDEIR) remains grossly deficient under the California Environmental Quality Act (CEQA).

Since most of the subject RDEIR is substantially the same as the 2008 Draft Environmental Impact Report (DEIR) and 2011 Final Environmental Impact Report (FEIR), the Conservancy's previously submitted comment letters regarding this project remain relevant and must be included in the case file for the benefit of decision makers and are hereby incorporated into this letter by reference. These letters are dated March 27, 2006; May 12, 2008; September 22, 2011; November 4, 2013; June 15, 2015; and July 9, 2015.

The RDEIR fails to adequately address the unavoidable, and unmitigable significant adverse biological and visual impacts of the proposed project. The proposed Statement of Overriding Considerations flat out does not address these unmitigated biological and visual impacts. The visual impacts from much of the San Fernando Valley, De Soto Avenue, and surrounding public parkland are part of the record submitted by the Conservancy.

The proposed Sesnon Alternative (Alternative 4) reduces biological impacts, however, the project would still locate 188 gated luxury homes and millions of cubic yards of grading in one of the most ecologically significant properties in the entire Santa Susana Mountains.

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If the proposed Sesnon Alternative project—even with all proposed biological mitigation measures—does not constitute an unavoidable significant adverse impact, then the City of Los Angeles appears incapable of recognizing such a level of unmitigable biological impact. The applicant—in coordination with some aspects of City government—knows that no Statement of Overriding Considerations can be justified in either scientific or cultural forums to ruin a key upper Los Angeles River watershed and core habitat area for a gated mass graded luxury subdivision. Currently the upper Browns-Mormon Canyon watershed is limited to a few ranch style residences. The proposed Sesnon Alternative would totally transform the ecological and visual character and resources of a significant natural watershed.

The RDEIR analysis and conclusions attempt to dismiss the magnitude of a leapfrog subdivision development into core wildlife habitat. Unfortunately there are not established scientific standards to exactly measure how much such a 154-acre development with an additional 100 acres of surrounding permanent indirect adverse impacts on the south slope of the Santa Susana Mountains would cripple that mountain range's permanent ecosystem capacity. The interplay of nature, time, and topography is too complex to deliver that type of metric without extensive longterm baseline ecological study of the whole mountain range.

The RDEIR analysis and conclusions capitalize on the lack of such metrics to falsely conclude on a zero data basis that the project would not result in permanent unavoidable significant biological impacts. The RDEIR biological analysis and conclusions are founded purely on an unsupported project-favoring assumption that the carrying capacity of the Santa Susana Mountains would not be permanently harmed or reduced by the proposed project. That RDEIR cumulative biological impact analysis is exceedingly vague and imprecise. For example what happens to the carrying capacity of the range after the already-approved Newhall Ranch, Porter Ranch, Deerlake Ranch, Lennar's 102-home Pico-Whickham Canyon project are built out with longterm southern California rainfall and temperature projections pointing to steady drought conditions? There is not even a simple RDEIR spatial analysis of this issue.

Human recreational and domestic pet intrusion (and their resultant impacts) into core habitat areas will also increase with these approved and future subdivisions in the Santa Susana Mountains. At some level, the required cumulative impact analysis must look at the existing zoning of all remaining undeveloped properties for a glimpse into what reasonably

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would be left of the Santa Susana Mountains ecosystem in approximately fifteen years or longer.

The project includes and abuts one of the few year-round water sources on the south side of the range. Its dry season water flow is unparalleled on the south slope of the range. Yet the RDEIR for all intents and purposes concludes (on pure unsupported) assumption that wildlife populations in the range can be sustained post-project implementation by animals moving into existing occupied habitats with inferior year-round water sources and without the gentle open topography of the proposed development area. The RDEIR analysis of potential project impacts on the sustainability of wildlife populations is grossly inadequate.

Is the burden of proof on wildlife population sustainability in a small urban-adjacent mountain range placed wholly on the citizens and agency's such as the Conservancy or is it on the developers and their Environmental Impact Report preparers? If the burden of proof comes down to expert opinions, then why does the RDEIR dismiss the relevancy of the approximately twenty biological academics from California institution of higher learning that signed on to a letter stating that a project in the proposed location with approximately 188 large homes would inevitably result in unavoidable significant biological impacts to the Santa Susana Mountains ecosystem? If the ratio of biological experts concluding that the 188 homes would result in unavoidable significant adverse biological impacts exceeds those in disagreement by a ratio of 10:1 or greater, it should cast serious doubt on the RDEIR conclusions. How many biologists not paid directly or indirectly by the developer have gone on record to conclude that a 188 home project in this location can be mitigated to level less than biologically significant?

The bottom line is that the proposed bandaid biological mitigation measures cannot offset the permanent biological impacts of a leapfrog major subdivision into core Santa Susana Mountains habitat. The proposed Alternative 4 is the most ecologically damaging development project proposed for consideration by the Los Angeles City Council in over twenty-five years. The most damaging is the adjacent Porter Ranch project.

The totality of biological mitigation measures in the RDEIR cannot offset this loss of habitat and the permanent project intrusions and movement obstructions. It is painful to see how the RDEIR preparers have attempted to dismiss each and every potentially significant biological impact based on wholly unsupported claims of impact offset or reduction. Such dismissal is nothing less than scientific distortion of true cause and affect.

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The subject property borders on the Michael D. Antonovich Regional Park at Joughin Ranch, owned by the Mountains Recreation and Conservation Authority (MRCA), to the west. Both Browns and Mormon Creeks flow through the project site and converge near its southern boundary. Another 78-acres of MRCA-owned open space abuts the subject property to the west. The southeast project boundary borders a pending 70-acre Porter Ranch Open Space dedication (VTT-50505) with a year-round flowing section of Mormon Creek. The RDEIR fails to address potential project-induced biological degradation of these permanently protected adjacent open space areas. The Porter Ranch open space was a biological mitigation measure. The proposed project would have multiple indirect deleterious impacts on that open space mitigation.

The proposed project site is located in the unincorporated area of the County of Los Angeles (County). The implementation of the project and the Sesnon Alternative would necessitate the annexation of the subject property by the City. (Which is requested by the applicant.) The County of Los Angeles Zoning Ordinance designation for the property allows for a maximum of 33 single-family residences as well as agricultural and livestock-keeping uses. A 33-unit project that can substantially avoid more biological impacts is described in Alternative 2 of the RDEIR's Alternatives Analysis section.

The proposed project objective of providing a public park with recreational facilities such as ballfields would be admirable in another context, but like all the project's objectives these must be examined in the context of sacrificing premier urban-adjacent core habitat. Recreational facilities do not amount to mitigation for the loss of regionally significant biological resources. Sadly the City continues to amend the Porter Ranch development agreement virtually on an annual basis for decades without negotiating new parkland within the multi-thousand acre Porter Ranch development. How much does the City really care about parkland in Porter Ranch based on those actions?

The Sesnon Alternative does not adequately mitigate for the increased danger to human life and property that comes with residential development in a high fire danger area, and in close proximity to the oil and natural gas storage fields of Aliso Canyon. The proposed Sesnon Boulevard bridge, which would provide primary access to the subject property, would become a potential traffic bottleneck for residents and first responders in the event of a wind driven brush fire. The proposed secondary access way through substandard, brush shrouded Browns Canyon Road is located virtually in the same bottleneck spot and would

