

SANTA MONICA MOUNTAINS CONSERVANCY

RAMIREZ CANYON PARK
5750 RAMIREZ CANYON ROAD
MALIBU, CALIFORNIA 90265
PHONE (310) 589-3200
FAX (310) 589-3207



April 4, 2005

Sue Chang, Senior City Planner
Los Angeles City Planning Department
Environmental Review Section
200 N. Spring Street, Room 763
Los Angeles, California 90012

**Final Environmental Impact Report
for the Mountaingate Project
EIR No. 99-3251-SUB
SCH No. 2003071197**

Dear Ms. Chang:

The Santa Monica Mountains Conservancy (Conservancy) has reviewed the above referenced Final Environmental Impact Report (FEIR) and remains concerned about potential significant adverse impacts to the visual and biological resources located on the project site. The loss of three acres of Southern Mixed Riparian Woodland habitat in Bundy Creek, and an inadequate combination of design and mitigation measures to shield views of the western housing cluster from San Vicente Mountain Park and from the Westridge Fireroad are the main sources of these concerns. In addition an adequate guaranteed funding source for patrol and maintenance of the open is glaringly absent. Furthermore, the FEIR is gambling on the feasibility of creating many acres of additional sustainable walnut woodland. That task is much easier said than done.

The FEIR should explicitly require that the applicant be required to dedicate in fee simple all portions of the undisturbed open space that require no fuel modification. If the project approvals provide for a guaranteed mechanism for homeowners associations to fund all brush clearance than that fee simple boundary should be expanded.

Unless that applicant can show a means of shielding views of the western development cluster, we urge the City to limit the development to the footprint described in the FEIR's environmentally superior alternative, which eliminates this western cluster.

We urge that the City require either a Community Facilities District or Landscape Maintenance District that directly funds the Mountains Recreation and Conservation

City of Los Angeles
Mountaingate Project FEIR -No. 99-3251-SUB
April 4, 2005
Page 2

Authority to maintain the subject open space, in perpetuity. Such maintenance will have to include upkeep of the newly constructed Canyonback by-pass trail. The geologic conditions in that trail area warrant ample maintenance funding. Several hundred acres of open space and an unstable trail warrant approximately \$15,000 annually to keep the resources in optimum condition.

These comments represent a quick response to the FEIR. We expect to provide comments again on the FEIR and on the project throughout the hearing process.

Please direct any questions and future correspondence to Paul Edelman of our staff at (310) 589-3200 ext. 128.

Sincerely,

ELIZABETH A. CHEADLE
Chairperson