

SANTA MONICA MOUNTAINS CONSERVANCY

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December 5, 2005

Jonathan Riker
Environmental Review Coordinator
Environmental Review Section
City of Los Angeles
200 North Spring Street, Room 750
Los Angeles, California 90012

**Notice of Preparation Comments - ENV-2005-2301-EIR
Vesting Tentative Tract Map No. 61553 (SCH No. 2005111054)
Woodland Hills, Girard Reservoir Adjacent**

Dear Mr. Riker:

The proposed project consisting of 37 detached single-family homes on a 6.19-acre property would permanently degrade the visual character of a key section of the Mulholland Scenic Parkway. In combination with the Los Angeles City Department of Water and Power's (DWP) adjacent Girard Reservoir property, the subject property provides a unique open, semi-rural setting along the parkway. Together with City of Los Angeles-owned open space (Alizondo Drive Park) on the opposing south side of Mulholland Drive and the broad undeveloped Mulholland Drive right-of-way, this is a unique section of the Scenic Parkway. The Draft Environmental Impact Report (DEIR) must describe both the public value and physical extent of this visual resource. In addition the DEIR must analyze how the project and each relevant DEIR alternative adversely impacts this viewshed that is protected by the Mulholland Specific Plan Ordinance.

Together with the DWP property, the site provides a unique wildlife refuge proximate (walking and biking distance) to numerous City residents.. This wildlife refuge is connected to the core habitat of the Santa Monica Mountains via the Mulholland Drive right-of-way and City-owned open space on the south side of Mulholland Drive that in turn parallels Topanga Canyon Boulevard to the south. The Notice of Preparation must address the existence and value of this 12-acre (half publically-owned) natural area and disclose that it is connected to a large natural area via protected public land. The DEIR must also provide a comprehensive picture to decision makers of what wildlife species currently use the site and how the site's natural resources buffer and enhance the habitat value of the Girard Reservoir.

Girard Reservoir as Future Public Parkland

There is reasonable probability that in the near future either the Santa Monica Mountains Conservancy, the Department of Recreation and Parks, or the Mountains Recreation and Conservation Authority (MRCA) could takeover ownership and/or management of all but the northeastern one acre of the DWP's 5.91-acre Girard Reservoir property. The DEIR must describe how the DWP property would provide an excellent local natural park. It must also address the Conservancy's first right of refusal under Section 33207 of the Public Resources Code. The subject property abuts almost fifty percent of the Girard Reservoir perimeter.

No Mulholland Specific Plan Exceptions

Given the public value of the subject viewshed, the open space resources, and the future parkland in the DWP property, we see absolutely no public policy justification to exempt any element of the project from any element of the Mulholland Scenic Parkway Specific Plan requirements. Much housing can be created on the site without a substantial set of adverse impacts to the Mulholland Drive viewshed. In other words, substantial development can occur by right on the property without any exemptions (exceptions) to the Specific Plan. We cannot think of a single public benefit to be gained by the City granting any exceptions to the ordinance.

Recommended DEIR Alternatives

On this note, the DEIR must include a project alternative that requires no exemptions (exceptions) from the Mulholland Specific Plan.

A second alternative could require limited exemptions from the Mulholland Specific Plan only if it can be conclusively demonstrated that they maximize both the post-project viewshed and habitat resources above and beyond the impacts resulting from a reasonable footprint for a by-right development.

A third DEIR alternative should include a project footprint with no development, roads, detention basins, or grading within 200 feet of the DWP property. If the DWP property were to become public parkland, this is the distance that the Mulholland Specific Plan requires for a setback from parkland. In addition this setback would maximize the size of the permanent open space block including the reservoir and it would contain much of the onsite oak woodland resources. If the Department of Transportation's codified line of site requirements require the San Feliciano and Mulholland Drive entrances to be further

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westward, that adjustment should be made but compensated for on a per square-foot basis with protected land west of the 200 foot line.

All DEIR alternatives must include a fee dedication of public open space to guarantee the long term ecological viability of the property. Likewise any interstitial, ungraded open space within the project must be protected by a conservation easement dedicated to a public agency. The Homeowners Association must be responsible through the tract CC&Rs for any required fuel modification on public land.

The description of the DEIR alternatives must also include a clear differentiation of open space acreage that is graded, that is graded and planted, and that is not permitted to be graded.

Please direct any comments and future correspondence to Paul Edelman, Deputy Director of Natural Resources and Planning, at the above address and by phone at 310-589-3200 ext. 128.

Sincerely,

ELIZABETH A. CHEADLE
Chairperson