



MOUNTAINS RECREATION & CONSERVATION AUTHORITY

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February 2, 2005

Daryl Koutnik
County of Los Angeles
Department of Regional Planning
Impact Analysis Section, Room 1348
320 West Temple Street
Los Angeles, California 90012

Comments on Administrative Draft Environmental Impact Report for Vista Verde Ranch Project, Project No. 99-028, Tract Map 47449

Dear Mr. Koutnik:

The Mountains Recreation and Conservation Authority (MRCA) appreciates the opportunity to comment on the Vista Verde Ranch project, Tract 47449¹. MRCA concurs with concerns regarding this project expressed by staff of San Gabriel & Lower Los Angeles Rivers Conservancy and California Department of Fish and Game. MRCA's primary concerns relate to the extensive loss of oak trees (472 trees) that would result from this project, the loss of raptor habitat, and the lack of assurances for preservation and management of any open space areas in perpetuity.

The proposed project consists of 92 single-family lots, eight open space lots, and one driveway lot on approximately 60.4 acres. Access would be provided off-site with a new street with 64 feet right-of-way from San Dimas Avenue, and from a 26-foot wide driveway from Valley Center Avenue. Retaining walls would be 10 feet in height, and a Walnut Creek trail dedication and equestrian staging area is included as part of the project. Open space lots are proposed to be maintained by the Homeowners Association. The project would result in the removal of 472 oak trees with multiple encroachments. Loss of oak woodland would total 9.66 acres (per Exhibit 5-12), or 7.96 acres (per. p. 69 of the DEIR). The DEIR does not adequately justify why the proposed project does not encompass all of the property ownership, including Walnut Creek. The potential of this project not being a case of piece-mealing must be explained better.

The DEIR states that significant impacts to biota and cultural resources can not be mitigated to less than significant levels. Los Angeles County staff recommends a redesign that provides access from an existing public street to the south.

¹The State Clearinghouse notice identifies this project at Tract Map No. 47499. The Los Angeles County Department of Regional Planning notice identifies this project as Tract Map No. 47449.

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The loss of 472 oaks and multiple encroachments is a significant impact that would require a statement of overriding considerations from the County to approve this project. The MRCA sees no justification for such overriding considerations. This includes loss of raptor habitat. The DEIR indicates that several sensitive raptors are known to occur onsite, and several raptors potentially could nest onsite. The loss of grassland onsite, would also diminish raptor foraging habitat. The project must be redesigned to avoid a substantial amount of these oaks. Specifically, oak tree mitigation should not be proposed within existing coastal sage scrub, as shown on in the northeast corner of the property on Exhibits 5-17 and 5-12.

All efforts should be made to avoid impacts to coastal sage scrub, a threatened plant community, which provides potential habitat for the threatened coastal California gnatcatcher and the California Special Concern species, cactus wren. Mitigation, in the form of restoration or acquisition of existing coastal sage scrub, for impacts to coastal sage scrub must be included in the California Environmental Quality Act (CEQA) document.

The approximately 12.8 acres of proposed open space areas (per Exhibit 3-5) are fragmented and surrounded by the proposed development. The project must be redesigned to avoid substantial impacts to oak trees, and the open space must be consolidated to maximize the potential for long-term persistence of the biological resources in the open space.

Maintenance of open space lots by the Homeowners Associations provides no guarantee that the biological resources and values in the open space will be maintained and preserved in perpetuity. The MRCA emphasizes that the CEQA document must include the requirement for an open space fee simple dedication to a public open space or conservation entity, or overlapping conservation easements to a public open space or conservation entity and the County of Los Angeles. The CEQA document must also require that long-term management funding be established. This can include an endowment established by the developer for long-term management of the open space or a Community Facilities District. Any fencing in the open space areas should be designed to allow for wildlife movement (e.g., small to medium sized mammals).

Thank you for the opportunity to comment. If you have any questions, please contact Judi Tamasi of our staff at judi.tamasi@mrca.ca.gov, or by phone at (310) 589-3200, extension 121.

Sincerely,

Michael Berger
Chairperson

cc: State Clearinghouse (Scott Morgan)