

SANTA MONICA MOUNTAINS CONSERVANCY

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August 22, 2005

Mr. Dirk Lovett, City Engineer
City of Hidden Hills
6165 Spring Valley Road
Hidden Hills, California 91302

Comments on Draft Environmental Impact Report for VTTM No. 54063, (SCH No. 2003091123) Hidden Ridge Project

Dear Mr. Lovett:

The Santa Monica Mountains Conservancy (Conservancy) has reviewed the Draft Environmental Impact Report (DEIR) for the Hidden Ridge Project. The project consists of Vesting Tentative Tract Map (VTTM) No. 54063 to subdivide the 23.05-acre site into 11 residential lots and one lot for the proposed Street A, and a Tree Permit to remove three oak trees. If the City approves a development on the site, the Conservancy recommends that the City approve the five-lot Smaller Project Alternative (Alternative 4). Also, the City should require an open space conservation easement over the ungraded open space to the City and another appropriate public entity capable of managing open space for resource protection and recreational use, such as the Mountains Recreation and Conservation Authority (MRCA).

The DEIR states that the project would result in significant project-specific and cumulative visual impacts, which have not been mitigated by the project. Specifically, the project would result in a substantial adverse effect on a scenic corridor, Highway 101 (p. 4.2-13).

The Conservancy concurs with the DEIR statement (p. 4.6-32) that the loss of the vegetation communities onsite (primarily non-native grassland) will contribute to the ongoing cumulative loss of the vegetation and wildlife habitat. Also, the DEIR states that this loss represents a significant cumulative impact, which has not been mitigated by the project. The Conservancy notes that this includes the significant cumulative loss of foraging habitat for raptors and passerines. In addition, the loss of the freshwater marsh is considered a significant impact prior to mitigation (p. 4.6-25). The site provides potential habitat for several special status species (p. 4.6-23 to 4.6-25), and the project would result in potentially significant impacts to these species, prior to mitigation.

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Alternative 4, the Smaller Project Alternative, would result in substantially less intrusive views from the 101 Freeway because this alternative would not result in the creation of fill slopes along the southern boundary of the site, and there would be no building pads on Lots 6 and 7 (p. 5.0-21). However, this would still contribute to a significantly unavoidable cumulative visual impact.

This Alternative 4 would avoid direct impacts to the cattail marsh, would protect most of the westerly drainage, would create a 8.9-acre buffer separating the development from the cattail marsh (in the southwest portion of the site), and would result in disturbance to 9.82 acres of non-native grassland (compared to 22.9 acres associated with the proposed project) (p. 5.0-23). However, cumulative impacts to biological resources would remain significant.

The California Environmental Quality Act (CEQA) requires avoidance of impacts to reduce the level of significance. If a Statement of Overriding Considerations is needed, then the City should strive to modify the project to reduce the level of significance, even if the Alternative also requires a Statement of Overriding Considerations. In this case, the City should require implementation of Alternative 4.

The City should also require the granting of a conservation easement to the City and to an agency such as the MRCA over the ungraded open space on the property. The easements must prohibit development, structures, new roads, grading, mineral extraction, grazing, vineyards, planting of non-native vegetation, fencing (other than used for habitat restoration), and utilities (other than what is allowed under current utility easements). Uses that should be allowed in this conservation easement include trails and habitat restoration, including the ability of conservation easement recipient to enhance the wetland. The Conservancy supports efforts to provide runoff or a drainage to the marsh, and/or a water pipe outlet to the open space to facilitate habitat restoration efforts of the marsh and non-native grassland. This easement is particularly warranted because of the cumulative significant impacts to visual and biological resources that would result even from the Smaller Project Alternative.

Thank you for your consideration of these comments. Please direct any questions and all future correspondence to Judi Tamasi of our staff at the above address and by phone at (310) 589-3200, ext. 121.

Sincerely,

JONATHAN M. ZASLOFF
Acting Chairperson

cc: State Clearinghouse (Scott Morgan)