

COMMENT No. 1

September 17, 2003

Wayne Tsuda, LEA Program Director
City of Los Angeles
Environmental Affairs Office
200 N. Spring Street
Room 2005, MS 177
Los Angeles, CA 90012

Comment 1.1:

Subject: Review of Mountaingate Draft Environmental Impact Report
State Clearinghouse No.: EIR-99-325 1-SUB, dated July 2003

This review of the Draft Environmental Impact Report (EIR) for the proposed Mountaingate development was conducted by the City of Los Angeles Environmental Affairs Department, Local Enforcement Agency (LEA). The LEA, in partnership with other state and regional regulatory agencies, has the responsibility of ensuring the proper permitting, operation and closure of solid waste facilities within the City of Los Angeles. The LEA is providing the following comments for your consideration.

Municipal solid waste landfills produce large quantities of landfill gas as the organic material undergoes anaerobic decomposition. The primary component of landfill gas is methane and carbon dioxide. Methane has is a flammable gas with a lower explosive level of 5 percent by volume in air and can act as a simple asphyxiant. Landfill gas naturally migrates away from the landfill due to internal pressure created within the fill area. It has been documented that uncontrolled landfill gas can travel up to 1,000 feet from a landfill and can carry other trace compounds which can be hazardous at certain concentrations.

The Mountaingate project is located directly adjacent to two closed municipal solid waste landfills. Many of the proposed homes on Stoney Hill Road are within a 1,000 feet of the closed landfills and can be impacted by landfill gas if mitigation measures are not established. Of special concern are parcels 9-11 that are in the vicinity of landfill gas migration probes, in which the LEA has, in the past, detected landfill gas over regulatory limits.

Specific Comments:

1. The EIR is deficient in that it needs additional technical analysis of the potential impact of landfill gas on the project. The EIR should be modified to include Mission Canyon Landfills #4 through #7 in the discussion and maps. The EIR mentions that the existing landfill gas migration probes will be impacted by grading and construction activities. The landfill gas migration probes are essential in the early detection and control of landfill gas migration. Landfill gas migration probes need to be constructed between the landfill and the proposed structures.

Response 1.1:

Please refer to the **Response to Comment 8.2** for information about the location of portions of the project site within 1,000 feet of a landfill.

The monitoring and mitigation measures discussed in the **Response to Comment 8.2** also apply to Mission Canyon 4-7 Landfills. Each of the Mission Canyon Landfills is subject to SCAQMD 1150.1 monitoring and mitigation requirements. Each of the landfills is fitted with monitoring probes and a landfill gas collection system. The amount of landfill gas collected from Mission Canyon 4-7 Landfills

has significantly diminished with time, based on information from the landfill gas collection system operator. However, landfill gas continues to be recovered by the landfill gas collection system and the landfill gas is either (1) concentrated for sale as a fuel source under contract to the University of California, Los Angeles or (2) combusted using an approved gas flare system.

Some of the existing landfill gas monitoring probes will be impacted by grading and construction activities. Any landfill boundary monitoring probes that are impacted during site development will be replaced and will be located at locations between the landfill and the proposed development. The **Response to Comment 8.2** contains a detailed discussion of landfill gas monitoring.

Comment 1.2:

2. Additional detail should be included on the construction of the building foundations. The Los Angeles Municipal Code and Title 27 of the California Code of Regulations both have requirements for impervious liners and foundation venting for structures built near landfills and other methane sources to ensure public safety. At a minimum, these should be included as part of the mitigation measures for landfill gas concerns.

Response 1.2:

Methane gas mitigation measures as required by the City of Los Angeles Building Code (Section 7100 et seq.) and the California Code of Regulations (CCR) Title 27 will be incorporated into the design and construction of structures and underground facilities.

Comment 1.3:

3. The EIR indicates that Mission Canyon Landfills #7 and #8 will be developed as an emergency fire/secondary access road and that top deck of Mission Canyon Landfill #8 will be used for soil stockpile. This will require the landfill owner to revise the site's post-closure maintenance and land use plan to incorporate the changes. The landfill security must be designed to discourage unauthorized access by persons and vehicles. If the landfill is to be opened to the general public, the landfill gas environmental control systems must be secured to prevent unauthorized access.

Response 1.3:

The Mission Canyon 8 Landfill post-closure maintenance and land use plan will be revised to incorporate use for emergency fire/secondary access road and soil stockpile. Construction of the emergency fire/secondary access road and stockpiling of soil will only require minor modifications to the post-closure maintenance and land use plan. This plan essentially describes measures that are used to maintain the landfill surface, and the plan will be modified to include monitoring the condition of and maintenance of the emergency fire/secondary access road. The intended land use of Mission Canyon 8 Landfill will remain unchanged; Mission Canyon 8 Landfill will continue to be designated as open space.

Landfill access will continue to be discouraged and limited. This will include traffic barriers or fencing from the proposed development to Mission Canyon 8 Landfill. Access to the landfill will be available only to emergency vehicles.

With regard to emergency access to the project site, the proposed improvement of the existing maintenance road on the landfill will provide access from the end of the proposed extension of Stoney Hill Road to Sepulveda Boulevard. This road will be maintained to fire department standards as an emergency secondary access road and will provide another means of access to the proposed project and the existing Mountaingate community.

Comment 1.4:

4. The City of Los Angeles is dedicated to maintaining its high diversion rates and in reducing the generation of solid waste. The solid waste section should be expanded to include the City of Los Angeles construction and demolition (C&D) recycling guidelines to be used during the construction phase of the project.

If you have any questions regarding the LEA's comments, please contact David Thompson at (213) 978-0868 or me at (213) 978-0864.

Response 1.4:

Page VII-4 of the Draft EIR is revised to state that City of Los Angeles C&D recycling guidelines will be followed during the construction phase of the project.

COMMENT No. 2

August 21, 2003

William R. Bamattre, Fire Chief
Alfred B. Hernandez, Assistant Fire Marshal
City of Los Angeles
Bureau of Fire Prevention and Public Safety

Comment 2.1:

Subject: Mountaingate

PROJECT LOCATION

Stoney Hill and Canyonback ridges with Mountaingate Master Planned Communities (Tract 29142).

PROJECT DESCRIPTION

Construction of 29 single-family dwellings and 2 private streets on 25.4 acres of a 449-acre project site. The balance of the site (424 ± acres) are proposed to be preserved as open space. This project is proposed as the final phase of development within the Mountaingate community.

The following comments are furnished in response to your request for this department to review the proposed development:

A. Fire Flow

The adequacy of fire protection for a given area is based on required fire-flow, response distance from existing fire stations, and this Department's judgment for needs in the area. In general, the required fire-flow is closely related to land use. The quantity of water necessary for fire protection varies with the type of development, life hazard, occupancy, and the degree of fire hazard.

Fire-flow requirements vary from 2,000 gallons per minute (gpm) in low-density residential areas to 12,000 gpm in high-density commercial or industrial areas. A minimum residual water pressure of 20 pounds per square inch (psi) is to remain in the water system, with the required gallons per minute flowing. The required fire flow for this project has been set at 2,000 gpm from 3 fire hydrants flowing simultaneously.

B. Response Distance

The fire department has existing fire stations at the following locations for initial response into the area of the proposed development:

Fire Station No. 109
16500 Mulholland Drive Los Angeles, CA 90049
Single Engine Company
Staff - 4
Miles - 2.95

Fire Station No. 99
14145 Mulholland Drive Beverly Hills, CA 90210
Single Engine Company
Staff - 4
Miles - 4.38

Fire Station No. 108
12520 Mulholland Drive Beverly Hills, CA 90210
Single Engine Company
Staff - 4
Miles - 5.50

The above distances were computed to southern terminus of Stoney Hill Road.

C. Firefighting Access, Apparatus, and Personnel.

Private development shall conform to the standard street dimensions shown on Department of Public Works Standard Plan D-22549.

Standard cut-corners will be used on all turns.

Construction of public or private roadway in the proposed development shall not exceed 15 percent in grade.

The width of private roadways for general access use and fire lanes shall not be less than 20 feet clear to the sky.

The fire department may require additional vehicular access where buildings exceed 28 feet in height.

Fire lanes, where required and dead ending streets shall terminate in a cul-de-sac or other approved turning area. No dead ending street or fire lane shall be greater than 700 feet in length or secondary access shall be required.

Private streets shall be recorded as Private Streets and Fire Lane. All private street plans shall show the words "Private Street and Fire Lane" within the private street easement.

Plans showing areas to be posted and/or painted, "FIRE LANE NO PARKING" shall be submitted and approved by the fire department prior to building permit application sign-off.

Electric Gates approved by the fire department shall be tested by the fire department prior to Building and Safety granting a Certificate of Occupancy.

In order to mitigate the inadequacy of fire protection in travel distance, sprinkler systems will be required throughout any structure to be built, in accordance with the Los Angeles Municipal Code, Section 57.09.07.

Irrigated and managed greenbelts around the perimeter of all structures for a distance of 200 feet shall be considered as a buffer between the brush and the proposed project. All landscaping shall use fire-resistant plants and materials. A list of such plants is available from the fire department.

All homes shall have noncombustible roofs (non-wood).

The entrance or exit of all ground dwelling units shall not be more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane.

Where access for a given development requires accommodation of fire department apparatus, overhead clearance shall not be less than 14 feet.

No framing shall be allowed until the roadway is installed to the satisfaction of the fire department.

Any required fire hydrants to be installed shall be fully operational and accepted by the fire department prior to any building construction.

No building or portion of a building shall be constructed more than 300 feet from an approved fire hydrant. Distance shall be computed along path of travel. Exception: Dwelling unit travel distance shall be computed to front door of unit.

This project is located in the Very High Fire Hazard Severity Zone and shall comply with requirements set forth in the City of Los Angeles Municipal Code 57.25.01.

Mitigating measures shall be considered. These measures shall include, but not be limited to, the following:

- a. Boxed-in eaves.
- b. Single pane, double thickness (minimum 1/8" thickness) or insulated windows.
- c. Non-wood siding.
- d. Exposed wooden members shall be two inches nominal thickness.
- e. Noncombustible finishes.

That in order to provide assurance that the proposed common fire lane and fire protection facilities, for the project, not maintained by the City, are properly and adequately maintained, the sub-divider shall record with the County Recorder, prior to the recordation of the final map, a covenant and agreement (Planning Department General Form CP-6770) to assure the following:

- A. The establishment of a property owners association, which shall cause a yearly inspection to be, made by a registered civil engineer of all common fire lanes and fire protection facilities. The association will undertake any necessary maintenance and corrective measures. Each future property owner shall automatically become a member of the association or organization required above and is automatically subject to a proportionate share of the cost.
- B. The future owners of affected lots with common fire lanes and fire protection facilities shall be informed of their responsibility for the maintenance of the devices on their lots. The future owner and all successors will be presented with a copy of the maintenance program for their lot. Any amendment or modification that would defeat the obligation of said association as the Advisory Agency must approve required hereinabove in writing after consultation with the fire department.

Submit plot plans for fire department approval of access and fire hydrants.

CONCLUSION

The proposed project shall comply with all applicable state and local codes and ordinances, and the guidelines found in the Fire Protection and Fire Prevention Plan, as well as the Safety Plan, both of which are elements of the General Plan of the City of Los Angeles C.P.C. 19708.

For additional information, please contact Inspector Griffin of the Construction Services Unit at (213) 482-6506.

Response 2.1:

The letter provides fire protection and emergency service availability information. In addition, the letter identifies general requirements that have been added as mitigation measures. Pages IV.O-14–IV.O-20 are revised to include these measures. Please refer to **Section I, Summary**, for a complete list of the proposed fire mitigation measures.

The project currently proposes to develop 7 homes along the extension of Canyonback Road and 22 homes along the extension of Stoney Hill Road. A secondary access road is provided from the end of the Stoney Hill Road cul-de-sac.

One of the requirements in this letter states, "...fire lanes, where required and dead ending streets shall terminate in a cul-de-sac or other approved turning area. No dead ending street or fire lane shall be greater than 700 feet in length or secondary access shall be required."

It should be noted that this mitigation measure would result in additional impacts. Per CEQA Section 15126.4(a)(1)(D), "If a mitigation measure would cause one or more significant effects in addition to those that would be caused by the project as proposed, the effects of the mitigation measure shall be discussed but in less detail than the significant effects of the project as proposed."

The provision of any secondary access road from the end of the proposed Canyonback Road cul-de-sac would require substantial additional grading. The project has been designed to minimize grading and related impacts to existing landforms, native vegetation, and landslides. For example, the proposed extension of Canyonback Road is routed around an existing knoll at the current end of the street in order to preserve this landform. While this alignment extends the length of the proposed extension of Canyonback Road, it preserves this knoll, in response to a request from the existing residents of the Mountaingate community. Any secondary access road that would provide access from the end of the proposed extension of Canyonback Road would require a substantial amount of additional grading which would result in additional environmental impacts related to existing landforms, native vegetation and related biological resources and existing landslide areas on the property.

As currently proposed, Canyonback Road would be extended approximately 950 feet from its current end point immediately south of Mountain Crest Lane. If secondary access is not provided, seven of the proposed 29 lots would be located along this extension of Canyonback Road. One of these lots would be located along the existing portion of Canyonback Road located between Promontory Road and Mountain Crest Lane and the other six lots would be located along the southern portion of the proposed extension of Canyonback Road. The distance from Promontory Road, the nearest road that provides access to Canyonback Road, to the end of the proposed extension of Canyonback Road would be approximately 1,200 feet, which exceeds the fire department's planning standard of 700 feet for dead end streets.

Several factors regarding the location of these six homes that would be located further than 750 feet from the nearest access road should be noted. First, a small number of homes, six, would be located at the end of Canyonback Road. Second, as the 36-foot-wide extension of Canyonback Road will only serve these

six lots, it will carry little traffic and will be open and available to fire and other emergency access vehicles at all times. Third, a new water system with fire flow and fire hydrants meeting the fire department's current standards will be provided. It should be noted that an existing water tank serving the Mountaingate community is located further to the south along the Canyonback ridge. Fourth, all of the homes will be fire-sprinklered inside.

This letter states, "...irrigated and managed greenbelts around the perimeter of all structures for a distance of 200 feet shall be considered as a buffer between the brush and the proposed project. All landscaping will use fire-resistant plants and materials. A list of such plants is available from the fire department."

Mitigation Measure 5 states that "Prior to issuance of occupancy permits for the proposed project, the perimeter of the entire development area shall have a minimum 200-foot clearance from brush to structure. Irrigation of any existing natural slope areas where brush is thinned as part of the fuel modification program is not required. Manufactured slopes will be replanted as required by the City with an emphasis on using drought tolerant native plants to minimize irrigation requirements. Required fuel modification areas will be maintained by individual homeowners, the proposed HOA, or the owners of the property on which these areas are located to ensure these areas are maintained in accordance with applicable requirements." A list of prohibited vegetation and shrubs is provided in Mitigation Measures 6 and 7. Mitigation Measures 8 and 9 state that irrigated seasonal shrubs and ornamental vegetation are allowed within the development area.

The letter also updates the information provided in the Draft EIR on page IV.0-4 regarding the fire stations that would provide initial response into the area of the proposed development. The information presented in the Draft EIR was provided by the fire department, as noted in the Introduction on page IV.O-2 and in the footnote on page IV.O-4. The updated information regarding the fire stations that would provide initial response to the proposed development does not change the analysis or conclusion that impacts upon fire protection services are not significant. The Draft EIR on page IV.O-4 is revised to reflect this information.

Please note that a total of 25.7 acres will be developed for the proposed home lots and private streets, as discussed in the **Introduction to Section II, Corrections and Additions to the Draft EIR.**

COMMENT No. 3

September 12, 2003

Cindy Miscikowski
City of Los Angeles Councilwoman
Eleventh District
Assistant President Pro Tempore
200 N. Spring Street, Room 415
Los Angeles, CA 90012

Comment 3.1:

I am writing to you regarding the Draft Environmental Impact Report (DEIR) for the proposed Mountaingate project to be located on Canyonback Road and Stoney Hill Drive in the Brentwood/Pacific Palisades Community Plan area. As you know this project was first proposed in 1997 to be 164 residential units. In 1998 it was reduced to 117 units, however, in October of 1999 the owners, Castle & Cooke, reached an agreement with the Mountaingate Community Association and the Mountaingate Open Space Maintenance Association to reduce the density to 29 units, as represented in the current proposal. This reduction in unit count and the willingness of Castle & Cooke to work through this project prior to release of the DEIR has been a real benefit to this community and has left only a few remaining concerns surrounding the proposal.

In the weeks since this report has been released, my office has received inquiries requesting further information be provided. One concern that has been raised I feel requires additional detail is protection of scenic views. In Section IV.S, Aesthetic Resources/Views, the applicant discusses the views as seen from lower Mandeville Canyon and from the immediate community surrounding the project site. There is no mention of the views from upper Mandeville Canyon or from the nearby ridge trails on upper Westridge Road. I believe that further schematic views should be provided in this environmental review showing visual impact from these two locations.

Response 3.1:

Supplemental visual analyses were prepared for the Final EIR in response to comments received on the Draft EIR. In response to these comments, particular attention was paid to the Upper Mandeville and Westridge neighborhoods and to the public trails in the area, both west and east of the project site. These additional analyses support the conclusions in the Draft EIR that the project would not result in a significant impact on the visual character of the site and surrounding areas.

These additional studies show that a limited number of the proposed homes and/or roofs of the proposed homes would be visible to varying degrees from the locations studied. Views of the site from various public viewing points in the area would also include views of existing Mountaingate community homes and/or the existing golf course as well as additional developed areas. From the residential neighborhoods and trails to the west and northwest of the Mountaingate community, the view of the proposed homes would not significantly change the visual character of the area due to the distance, topography, and the limited amount of the proposed development that would be visible. The proposed homes would not be visible from Mandeville Canyon Road. The new proposed homes would extend the existing edge of the Mountaingate community slightly further to the south. From the public trail to the east of the site and Interstate 405 (I-405), this incremental extension of the southern edge of the

Mountaingate community would not significantly change the visual character of the area due to the large number of homes currently visible and the golf course, which is prominent in the foreground of views from the east. As a result of the limited impact of the proposed project on existing views, implementation of the proposed project would not substantially degrade the existing visual character or quality of the site and its surroundings, nor would it create a substantial adverse effect on a scenic vista. As identified in the Draft EIR, for these reasons, no significant impact would result from implementation of the proposed project.

The visual impacts of the proposed project have been minimized to the extent feasible through project design, including the location of the lots in relation to existing topographic features, the elevations of the proposed building pads, and the proposed grading. In most cases, building pads would be 20 to 30 feet lower than the existing elevations. This lowering of building pads relative to the existing grade combined with the topography on the site and in the area would reduce the number of homes and amount of each home visible. In addition, the existing 1,610-foot knoll located south of the existing end of Canyonback Road is being preserved. This knoll would screen views of some of proposed homes on the Canyonback extension from existing homes to the north in the Mountaingate community and from the trails to the west of the project site and maintain the varied topography in that portion of the site. The proposed lots along Stoney Hill ridge would generally follow the topography of the existing ridgeline.

Three methods were used to provide the additional analysis of some of the visual impacts of the proposed project: (1) story poles were placed to identify the height and location of proposed structures; (2) photographs were taken from locations to the west, northwest and east of the site and visual simulations placing the proposed homes on the site were prepared; and (3) cross sections representative of views from the photo locations were also prepared. As the viewing location changes, the views would vary somewhat from those presented in the photographs and site sections.

Figure III-1, Site Sections Key Map, identifies the locations of the cross sections provided. **Figures III-2 and III-3** show Site Sections AA and BB, and Site Sections CC and DD, respectively. **Figure III-4, Photo Locations Key Map**, identifies the locations where the photos were taken. The views from the three photo locations are shown in **Figures III-5, Westridge Trail, III-6, San Vicente Mountain Nike Site, and III-7, East Sepulveda Fire Road**. The locations of some of the proposed lots are indicated in each photo to orient the viewer. The Photo Locations correspond to Site Sections. Photo Location 1, Westridge Trail, corresponds to Site Section DD, Photo Location 2, San Vicente Mountain Nike Site, corresponds to Site Section CC, and Photo Location 3, East Sepulveda Fire Road, corresponds to Site Sections AA.

**Figure III-1
Site Sections Key Map**

**Figure III-2
Site Sections AA and BB**

**Figure III-3
Site Sections CC and DD**

**Figure III-4
Photo Locations Key Map**

Figure III-5

Photo Location 1, Westridge Trail

Figure III-6

Photo Location 2, San Vicente Mountain Nike Site

Figure III-7

Photo Location 3, East Sepulveda Fire Road

A home height of 36 feet was assumed in the visual impacts analysis, as proposed homes would not exceed 36 feet in height. Please see the **Response to Comment 17.25** for more information about the height guidelines in the City's Zoning Code (LAMC 12.21) applicable to the project site.

Story poles to identify the height and location of proposed structures, were placed on Lots 1, 11, 28, and 29, as suggested in several of the comments received on the Draft EIR. The use of story poles was determined not to be an effective technique for the proposed homes on Canyonback because a majority of the lots would be created by excavation, and the final building pad grades would be below the existing grades. As a result, most rooftops would be near or below the existing grade.

The use of story poles was more effective for proposed Stoney Hill homes. Story poles were put on both ends of the proposed Stoney Hill Road extension on Lots 1 and 11. Lot 1 is currently at an elevation of 1,490 feet and would have a finished building pad elevation of 1,470 feet. The story pole on Lot 1 was approximately 16 feet above the existing ground due to the final lot grade being lower than the existing grade. This lot would be visible from the east. Lot 1 would not be visible from Mandeville Canyon, as it would be blocked by the existing 1,610-foot knoll at the existing end of Canyonback Road. Lot 11 is currently at an elevation of 1,500 and would have a finished building pad lot elevation of 1,460 feet. As a result of this change in grade, the top of the home on Lot 11 would be at the existing grade.

Story poles were placed on Lot 28, which is currently at an elevation between 1,550 to 1,570 feet and has a proposed elevation of 1,530 feet. The story poles representing the top of the roof would be located below ground level to approximately 16 feet above ground level. Story poles were also put on Lot 29, which is at an elevation of 1,510 feet. These story poles were visible as the proposed grade on this lot would be similar to the existing grade.

Westridge Trail

Photo Location 1 is on the Westridge trail, approximately 1.1 linear miles west of the project site. The camera is at an elevation of 1,782 feet. The view from Photo Location 1 is shown in **Figure III-5**. The view is primarily of vegetated hills in the foreground. Over 50 existing homes on Canyonback Road are now visible on an intermediate ridge, with homes on Roscomare Road, located east of the I-405, visible in the background. On a clear day, buildings of downtown Los Angeles can be seen. Parts of the Westridge trail are located on the west side of the ridge, with views to the west only, and parts of the trail are located on the top of the ridge, with views to the west and east.

The proposed homes would incrementally extend the existing view of homes on hills in the area, including the existing homes in the Mountaingate community. From this vantage point, the first and second floors of the homes on Lots 24, 28, and 29, a northern portion of the home on Lot 23, and the

second floor and rooftops of the homes on Lots 25, 26, and 27 would be visible. Lot 29 is located adjacent to existing homes east of Lot 29, and existing homes in the Mountaingate community are located approximately 250 feet north of Lot 29 and approximately 100 feet to the east of Lot 29. The home on Lot 29 would, therefore, have existing homes located to the left of, and behind, the proposed home on this lot. Approximately 10 to 12 feet of the retaining wall located along Canyonback Road on the west side of the knoll would also be visible. The wall would be a natural color, and split-face or slump stone in order to give it a more natural appearance. In addition, the wall would be landscaped, with landscaping planted on top of the wall and trailing down. Also, from this vantage point, portions of the homes on Lots 9–12 on Stoney Hill Road would be visible on the distant ridge. These photo simulations were prepared without the placement of any landscaping on the lots in order to provide a “worst case” scenario for evaluation purposes. Once built, the lots would be landscaped and, as a result, would blend into the hillsides similarly to the existing Mountaingate community homes. From this location, the proposed homes would not significantly change the visual character of the area due to the topography and limited number of homes and/or roofs of homes that would be visible when compared to the number of existing homes that are visible.

Site Section DD in **Figure III-3** shows that from the existing trail, at an elevation of 1,782 feet, the home on Lot 28 would be visible. Only a portion of the home on Lot 23 would be visible because it would be partially blocked by the home on Lot 24 and because Lot 23 would be 10 feet lower than Lot 24. The homes on Lots 22 and 3 on Stoney Hill Road would be located behind and at a lower elevation than the home on Lot 28 and, therefore, would not be visible from this location. However, a site section is limited to a single line of focus and is not representative of the entire view available from a particular location. As discussed above, from this location, the first and second floors of the homes on Lots 24, 28, and 29, a northern portion of the home on Lot 23, and the second floor and rooftops of the homes on Lots 25, 26, and 27 would be visible. As shown on Site Section DD, proposed homes would not be visible from Mandeville Canyon Road. Lots 23–28 on Canyonback Road would be cut with slopes toward the east.

San Vicente Mountain Nike Site

Photograph Location 2 is the San Vicente Mountain Nike Site, along the Westridge Trail, at Mulholland Drive. The camera at the Nike Site is at an elevation of 1,908 feet. The distance from this location to Lot 28 is approximately 2 linear miles. The view from Photo Location 2 is shown in **Figure III-6**. The existing view from this location is primarily of the Santa Monica Mountains. The view also includes a number of homes in the existing Mountaingate community at the southerly end of existing Canyonback Road on an intermediate ridge.

The proposed project would add to this view the home on Lot 29 and the second floor and roofs of the homes on Lots 25–28. A portion of the home on Lot 24 would be visible. The remainder of the home on Lot 24 would be located behind the 1,610-foot knoll and would not be visible. The other new home on Canyonback Road, Lot 23, would be located behind the 1,610-foot knoll and would not be visible from this location. Approximately 10–12 feet of the retaining wall located along Canyonback Road on the west side of the knoll would also be visible. The wall would be a natural color, split-face or slump stone in order to give it a more natural appearance. In addition, the wall would be landscaped, with landscaping planted on top of the wall and trailing down. Also from this vantage point, the rooftops of the homes on Lots 9–12 on Stoney Hill Road would be visible on the distant ridge. These photo simulations were prepared without the placement of any landscaping on the lots in order to provide a “worst case” scenario for evaluation purposes. Once built, the lots would be landscaped and, as a result, would blend into the hillsides similarly to the existing Mountaingate community homes. From this location, the view of the proposed homes would not significantly change the visual character of the area due to the distance, topography, and the limited number of homes and/or roofs of homes that would be visible and added to the existing view of homes in the Mountaingate community. As shown on Site Section CC in **Figure III-3**, the home on Lot 28 would be visible from this location at the San Vicente Mountain Nike Site. Also, as shown on Site Section CC, the proposed homes would not be visible from Mandeville Canyon Road.

East Sepulveda Fire Road

Photo Location 3 is on the East Sepulveda Fire Road where it meets the Getty Center Trailhead, east of the I-405. The East Sepulveda Fire Road is accessible from the Getty Center Trailhead, located on Sepulveda Boulevard, and from the adjacent residential neighborhoods. The camera at this site is at an elevation of 1,206 feet. The view from Photo Location 3 is shown in **Figure III-7**. As shown, the current view includes the existing Mountaingate community, comprised of over 300 homes on the intermediate and more distant ridges, and the golf course in the foreground.

From this viewing location, the homes on Lots 1–11, which would be located on the east side of the extension of Stoney Hill Road, would be visible. Also, portions of the homes on Lots 13, 14, and 16–21 would be visible. The homes on Lots 12, 15, and 22 would not be visible because those building pads on the west side of Stoney Hill Road would be at approximately the same elevation as the building pads on the east side of Stoney Hill Road and, therefore, would be blocked from view by the homes on Lots 1–11. The view of these homes on the western side of Stoney Hill Road is also limited from this location because the East Sepulveda Fire Road is at an elevation of 1,220 to 1,280 feet and the proposed lots on Stoney Hill Road would be at elevations of 1,420 to 1,470 feet. Development of the proposed homes on the extension of Stoney Hill Road would extend the views of the existing homes in the Mountaingate

community to the south (left) of the existing community to include the homes on Lots 1–11 and portions of the homes on Lots 13, 14, and 16–21, as shown in **Figure III-7**. These photo simulations were prepared without the placement of any landscaping on the lots in order to provide a “worst case” scenario for evaluation purposes. Once built, the lots would be landscaped and, as a result, would blend into the hillsides similarly to the exiting Mountaingate community homes. Due to the large number of homes and the golf course, which are currently visible in the foreground, the incremental extension of the existing edge of development and small increase in the number of homes visible would not significantly change the visual character of the area.

Site Section AA in **Figure III-2** shows that the house on Lot 1 would be visible, as the East Sepulveda Fire Road is at an elevation of 1,206 feet and the building pad on Lot 1 is at an elevation of 1,470 feet. The homes on Lots 23, 24, and 28 on Canyonback Road would not be visible due to the intervening ridge. The golf course is visible in front of the proposed homes. However, a site section is limited to a single line of focus and is not representative of the entire view available from a particular location. As discussed above, from this viewing location, the homes on Lots 1–11, which would be located on the east side of the extension of Stoney Hill Road, would be visible. Also, portions of the homes on Lots 13, 14, and 16–21 would be visible.

Site Section BB in **Figure III-2** shows that from this location on the Sepulveda Fire Road, at an elevation of 1,280 feet, the proposed homes would not be visible. The home on Lot 28 would not be visible because of the intervening topography and the upward viewing angle. The existing homes in the Mountaingate development are visible. The homes on Canyonback Road would not be visible from vantage points east of the I-405 due to intervening topography and the upward viewing angle. However, a site section is limited to a single line of focus and is not representative of the entire view available from a particular location. As discussed above, Photo Location 3 corresponds to Site Section AA, and is at an elevation of 1,206 feet. Site Section BB, located north of Site Section AA along the East Sepulveda Fire Road, is at an elevation of 1,280 feet, 74 feet higher than Site Section AA. Therefore, views of the project homes from Site Section BB would be similar to those in Site Section AA and Photo Location 3 and, from this viewing location, the homes on Lots 1–11, which would be located on the east side of the extension of Stoney Hill Road, would be visible. Also, portions of the homes on Lots 13, 14, and 16–21 would be visible.

The Draft EIR concluded that no significant impact to visual or aesthetic character would occur as a result of the proposed project. The additional analyses prepared support the conclusion reached in the Draft EIR. No significant impact to the visual or aesthetic character of the site and the surrounding area would occur as a result of project implementation. Implementation of the proposed project would neither substantially degrade the existing visual character nor quality of the site and its surroundings nor would

it create a substantial adverse effect on scenic vistas available from public viewing locations in the area due to the distance of the project site from available viewpoints, existing topography, and the limited amount of the proposed development that would be visible.

Comment 3.2:

In addition, in Section IV.C, Water, there is discussion of the runoff into Bundy Canyon. This issue has been a concern in the Brentwood Community for many years. During the rainy season under, current unaltered conditions, it is not feasible to add more runoff without creating an even more difficult situation. On page IV.C-11, the DEIR states, "A portion of the easterly ridge area, which currently drains to the east towards the existing golf course, would also have a reduction in runoff with this area being diverted to Bundy Canyon." The DEIR goes on to state that due to new retention basins planned for Bundy Canyon there would not be an adverse impact on the current drainage. Despite this I think it is imperative that further detail is provided to explain this conclusion and the steps necessary to improve drainage in the Canyon as part of this application.

I appreciate the diligence the developer has shown and look forward to further detail being provided on the two issues I have raised.

Response 3.2:

The detention basin will be designed to have no impact on downstream areas with respect to water volume or velocity. The purpose of the debris/detention basin is to mitigate the change in flows due to the development. Therefore, the flows downstream will not be changed as a result of implementation of the proposed project, including the debris/detention basin.

The debris/detention basin has been relocated to about 250 feet upstream from its original location as presented in the Draft EIR, and additional analyses have been conducted. This new location would potentially avoid the more sensitive vegetation that is located at the bottom of the canyon by transferring the impact to the canyon sides further upstream. These studies indicate that the current proposed location minimizes to the maximum extent feasible the impact of the debris/detention basin on the existing canyon bottom for the following reasons:

1. If the debris/detention basin were eliminated altogether, the impact to the existing canyon bottom could not be reduced any further. This is because the 2:1 (horizontal:vertical) fill slope of Stoney Hill extends across the existing canyon to daylight with the other side of the existing canyon. In short, the larger factor here is the fill slope.
2. If the debris/detention basin were moved farther up the canyon than the 250 feet proposed, less of the runoff would be captured and, therefore, the requirement to mitigate peak flows would not be fulfilled. The basin needs to be downstream of the area impacted.
3. If the debris/detention basin were split into two and moved upstream to handle the same volume, the canyon would be impacted more because the area of two medium-sized basins will exceed the area of one larger basin. Furthermore, the proposed maintenance road would have to be lengthened to serve the second basin. A longer maintenance road means more fill is required for a level roadway, and more fill means more impact to the canyon.

4. Per the City of Los Angeles grading requirements, a 30-foot-wide bench is required for every 100 feet vertical on a 2:1 slope. Also, the basin needs to be set back away from the toe of any slope for stability of the hillside. The ledge at elevation 1,240 feet serves both of these two purposes. Moving the basin from this elevation would eliminate this shared purpose, thus, increasing the area to be graded and increasing the impact to the canyon.