



Las Virgenes Homeowners Federation, Inc.

Post Office Box 353, Agoura Hills, California 91301



*The **voice** and conscience of the Santa Monica Mountains since 1968*

Monday, April 6, 2015

Los Angeles County Regional Planning Commission
Regional Planning Department
320 West Temple Street
Los Angeles, CA 90012

RE: AGENDA ITEM 9

**PROJECT NO. R2012-02436 TO 02440 AND R2013-03620 TO 03630-(3)
ENVIRONMENTAL ASSESSMENT CASE NO. 201200258**

SUPPORT – Invalidate Approvals in Concept for Vintage Pacific. Comply with LCP.
OPPOSE – Validation of MND. Require New Environmental Review.

Dear Regional Planning Commissioners,

On behalf of the Las Virgenes Homeowners Federation of the Santa Monica Mountains, and our nearly 10,000 stakeholders, please invalidate the Approvals in Concept for the Vintage Pacific 16 home development tract project proposed for Monte Nido - our designated rural village, in the heart of the Santa Monica Mountains Local Coastal Program (LCP).

The proposed suburban housing tract is in direct conflict with many of the provisions of the new LCP. When the Planning Director issued the Approvals in Concept, the LCP had not yet been certified, but now that it has been certified, the County must invalidate these approvals and require the developer to re-design the residences in full compliance with the LCP.

For almost a decade, the Las Virgenes Homeowners Federation worked closely with your Regional Planning Staff to ensure the LCP contained clear regulations to protect the homeowners, property owners, and the Santa Monica Mountains most sensitive habitat areas – a scenic, recreational, and ecological resource of national and regional significance – for generations to come.

Your Commission now has the local control that we fought so long and hard for – and is in the position to enact the detailed rules and implementation mechanisms of the LIP to ensure the full intent of the LUP policies are faithfully and consistently executed.

The County must demonstrate its commitment to the enforcement of these important protections in the LCP.

Furthermore, the invalidation of those Approvals in Concept should also invalidate the Mitigated Negative Declaration (MND). CEQA requires an adequate Project Description as the foundation of the environmental analysis. If the project is invalidated, then by definition the environmental analysis accompanying the project becomes moot.

The Commission must await a newly designed project before deciding what level of environmental analysis is appropriate. It cannot simply assume that the new project will have less significant impacts.

Moreover, this MND is inadequate - CEQA requires the County to fully analyze the impacts. The development would allow structures to be built as close as 35-50 feet from the most sensitive habitat areas and yet the MND was silent as to the negative impacts to our biological and scenic resources. The new LCP clearly stipulates that anything closer than 200 feet from either State Parkland or H1 habitat areas will negatively impact the coastal resources. The MND should have analyzed exactly what those impacts are and then either proved that various mitigation measures would lessen the impacts to an insignificant level or conclude that they could not be mitigated, thus triggering the requirement of a full EIR.

We respectfully urge you to invalidate both the Approvals in Concept and the Mitigated Negative Declaration.

Therefore, we support the staff recommendation to invalidate the Approvals in Concept and we ask that you deny the staff's recommendation to validate the inadequate MND – and instead require new environmental review for the new project consistent with the LCP.

Sincerely,

Kim Lamorie
President

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