

**LETTER FROM: PALOS VERDES PENINSULA HOESMENS ASSOCIATION, DALE ALLEN,
PRESIDENT AND VIC OTTEN VP CIVIC AFFAIRS**

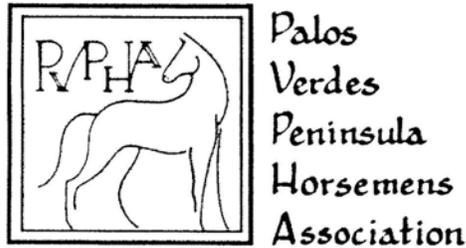
-----Original Message-----
From: vjotten@cox.net [<mailto:vjotten@cox.net>]
Sent: Tuesday, June 30, 2009 3:42 PM
To: Niki Cutler
Cc: dale39@cox.net; vjotten@cox.net
Subject: Comments to Chandler Ranch EIR

Dear Ms. Cutler:

Attached are the comments by the Palos Verdes Peninsula Horseman's Association (PVPHA) on the April 2009 Draft Environmental Impact Report for the Proposed Chandler Ranch/Rolling Hills Country Club Project ("Draft EIR"), State Clearinghouse Number 2008011027. Please forward a copy of the comments to the council members.

HA-a1

With regards,
Vic Otten



June 30, 2009

Niki Cutler, AICP
Principal Planner
City of Rolling Hills Estates

Dear Ms. Cutler,

We are writing on behalf of the Palos Verdes Peninsula Horseman's Association (PVPHA) with comments on the April 2009 Draft Environmental Impact Report for the Proposed Chandler Ranch/Rolling Hills Country Club Project ("Draft EIR"), State Clearinghouse Number 2008011027. The PVPHA is a non-profit tax exempt 501(c)(3) corporation dedicated to preserving horse keeping in the Palos Verdes Peninsula.

As will be explained, the draft EIR prepared by the Applicant is seriously flawed and has failed to adequately address the environmental impacts that will occur with a project of this magnitude.

When evaluating this project, we respectfully request that the City not lose sight of the fact that the Applicant wants to build a **private** golf course in a community that prides itself in the preservation of open space and public access to a small but wonderful trail system; what makes this even more troubling is that the Applicant wants special privileges from the City which will only benefit the small number of people that can afford to belong to this club or purchase one of the expensive homes.¹ Should this project ultimately be approved, the City will have elected to replace trail access and the rural nature of its community with a massive **private** golf course and mega housing complex for the rich that will greatly increase the density of the City housing.

As will be demonstrated in this comment letter, this project could be developed in an environmentally conscious manner but for the Applicant's desire to completely maximize the profits that it will ultimately realize on this venture. For example, there is no need to build the number of houses proposed by the Applicant except to increase profits (and the density of the area). In addition, the Applicant is refusing to incorporate a

¹ We have been told that less than 10% of the residents of Rolling Hills Estates are members of the Rolling Hills Country Club. We have no idea if this number is accurate.

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trail system that was proposed by the City in a Horsetrail Map because the Applicant does not want horses to interfere with its swanky development.²

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(cont.)

A. History of equestrian activities in rolling hills estates

The Palos Verdes Peninsula has a rich history of ranching and farming. From the arrival of Juan Rodriguez Cabrillo in 1542 to the grazing of livestock by Juan Jose Sepulveda 300 years later, this area has been characterized by the rural lifestyle. As land and farming have been cast aside in the name of development, several cities in the area have attempted to preserve what is left of the open space and country lifestyle.

The City of Rolling Hills Estates has always touted itself as being founded to preserve rural nature of the community and the equestrian lifestyle of the community—open space, large residential lots, and white picket fences are what make this City great. Until recently, the website for the City stated: "the City of Rolling Hills Estates was incorporated on September 18, 1957 in order to preserve the unique rural-residential and *equestrian environment*."(Emphasis added)³ In fact, there is a picture of a little girl leading a pony on the home page of the website for the City.⁴

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These goals of preserving open space and the equestrian lifestyle are set forth in the General Plan policies for Planning Area 2 which currently designates the project site as Very Low Density Residential with a maximum density of one unit per acre with a horse overlay. Moreover, the City had originally planned a horse trail that ran around the Project Site starting along Palos Verdes Drive East and moving towards the North and Northwest, which would connect to a vast network of existing trails.⁵ Interestingly, this map does not appear to have been incorporated into the Draft EIR for this **private** golf course and community.

B. The Applicant refused to meaningfully consult with equestrians regarding project development

On two occasions, members of the PVPHA board of directors met with the Applicant's Project Manager, Mike Cope, to discuss the project. The meetings were requested by the PVPHA as a way to provide input into the Project. The PVPHA

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² The Map was drawn by J. Pool and last revised in February 1991.

³ Coincidentally, about the time that Applicant began developing this project, the City removed the statement regarding preserving the equestrian environment. The website previously stated: "the City of Rolling Hills Estates was incorporated on September 18, 1957 in order to preserve the unique rural-residential and equestrian environment." However, it was changed in April 2007 to read: "Fifty one years ago, the City of Rolling Hills Estates, located on the beautiful Palos Verdes Peninsula, officially became Los Angeles County's 60th municipality. In that first year in 1957, the City's population totaled only 3,500, but its new citizens were united in their concern over maintaining its unique rural atmosphere characterized by rolling hills, vast open spaces and three-rail white fences."

⁴ See, www.ci.rolling-hills-estates.ca.us

⁵ City of Rolling Hills Estates Horse Trail Map provided by Niki Cutler on February 4, 2008 attached as **Exhibit I**.

believes that developments can be designed in a manner that accommodates the sometimes competing needs of the equestrians and the developers. In the case at hand, the Applicant has taken an “all or nothing” approach to the Project refusing to compromise on anything.

In reviewing the project with Cope, it became apparent that the Applicant had no intention of having equestrian trails through or around the project. We discussed with Cope the City of Rolling Hills Estates Horse Trail Map and proposed horse trail around the project site. Cope stated that the applicant did not want the liability of having horses and equestrians adjacent to the golf course. He also stated that the Applicant would not be willing to pay for the expenses of putting in the trail or bear the expense of maintaining the trail. Most significantly, Cope stated that the Applicant did not want to have any horses around the golf course.

Cope started to suggest that the project could be mitigated by the Applicant providing the funding to complete the Rolling Hills Estates Equestrian facility. However, it soon became apparent that the Applicant was not serious about mitigating the environmental impacts associated with building this project and that the Applicant expected to have the Project approved regardless of the equestrians or environmentalists. *In fact, none of the mitigation measures suggested by the PVPHA even made it into the Draft EIR.*

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(cont.)

C. Removal from horse overlay district creates a significant land use impact and the proposed mitigation measures are inadequate

As noted in the Draft EIR, the applicant’s request to remove the property from the Horse Overlay District creates a “significant land use impact.”⁶ Interestingly, however, the applicant states that the reason the Project needs to be removed from the Horse Overlay District is because “...the proposed golf course and equestrian facilities are incompatible with one another.”⁷ As there have been horse trails along the perimeter of the section of golf course on the west side of Palos Verdes Drive East for over 35 years, it is clear that the applicant is not intending to imply that horses and golfing cannot share the same locality.⁸ In fact, the applicant later states that golf courses “...are not necessarily incompatible with equestrian uses, and that there are many examples in Los Angeles County of equestrian uses located in close proximity to golf courses.”⁹

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Rather, the Applicant desires to have the project removed from the Horse Overlay District so it can build more expensive houses and have a bigger **private** golf course. The Applicant states that “... it may not be practical to establish equestrian uses and facilities within the residential portion of the project (the proposed residential lots are clustered are

⁶ Draft EIR, page 3.8-18.

⁷ Draft EIR, page 3.8-18.

⁸ See Horse Trail Map attached as Exhibit 1 hereto depicting the trail starting around Sorrel Lane and going towards Dapple Gray. The area directly adjacent to the East is the golf course.

⁹ Draft EIR, page 3.8-18.

not large enough to realistically permit the stabling of horses)...”¹⁰ In other words, the number of houses that the applicant wants to build is the reason that it believes the proposed golf course and equestrian facilities are incompatible with one another.¹¹

The Applicant states that provisions should be made to accommodate equestrian uses through the dedication of a trail within the project site that links with other trails in the community.¹² It does not appear, however, that the Applicant has any intention of honoring this statement. Instead, the Applicant wants the City to approve the project without any guarantee that the impacts from the proposed change in land use will be mitigated. The City cannot allow this to happen.

About one year prior to the publishing of the Draft EIR, three members of the PVPHA’s board of directors toured the Project Site with the Applicant’s project manager Mike Cope. During the visit to the site, we showed Cope where the proposed trail that is marked on the City of Rolling Hills Estates Horsetrail Map was supposed be located. Cope summarily dismissed the idea of including the proposed trail because it would involve shortening the length of one of the greens on the golf course. He stated that Arnold Palmer would not allow his name to be used on the course unless the greens were a certain size. As the proposed trail literally runs along the borders of the proposed project, it is difficult to imagine how this could present a real obstacle to adding the trail. To the extent the applicant believes that it will, we request that the draft EIR examine what is involved with adding the proposed trail and the licensing requirements demanded by Palmer.

While the Draft EIR recognizes that removal of the Project Site is a “significant impact,” the proposed mitigation is totally inadequate. The Draft EIR provides that the mitigation for this is that provisions should be made to accommodate equestrian uses through the dedication of a trail within the project site that links with other trails in the community. The problem is that the Draft EIR fails to commit the applicant to any mitigation whatsoever: “The exact location and alignment of such a trail would be subject to review to address safety concerns of equestrians and be designed in a way so as not to impede the primary (golf course) recreational use of the project site.”¹³ The applicant should be required to include real mitigation measures in the EIR.

Remember, the applicant is proposing a **private** golf course. We are informed that it currently costs around \$60,000 to join to the Rolling Hills Country Club. We are deeply concerned that the Applicant is requesting that the City approve a project that will benefit only a very small percentage of its residents (we are told less than 10%) while depriving the majority of the use of this open space and proposed trail network.

¹⁰ Draft EIR, page 3.8-18.

¹¹ The Applicant has failed to properly address the housing density issues in the Draft EIR. Moreover, the Project is inconsistent with the City of Rolling Hills Estates Housing Element and Resolution No. 1771 in several respects including low income housing requirements.

¹² Id.

¹³ Id.

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(cont.)

D. The Draft EIR fails to adequately address the potential for the project to impact biological resources

The Draft EIR relies on a report prepared in November 2007 by AMEC Earth & Environmental Inc., (AMEC) to base its analysis in the Draft EIR related to the impact on biological resources. As a preliminary matter, one site visit nearly two years ago is insufficient to determine what biological species exist at the site. It is likely that AMEC might have missed an animal because of the time of year that it chose to visit the site (some animals are migratory). In addition, site conditions might have changed since the site visit by AMEC. The Applicant should be required to conduct an expansive site assessment to properly analyze the impact to biological resources prior to the approval of the EIR.

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The Draft EIR notes “a few small remnant patches of coastal sage scrub present along the steep sided margins and bluffs of some of the Chandler Quarry’s mining pits.” It takes the position that because the Applicant has basically destroyed whatever naturally occurring coastal sage scrub once existed, it is now gone and not a concern. If this project was within the coastal zone, the State would likely require that the Applicant restore all of the coastal sage scrub and the City should as well.

i. BIO-2: Loss of coastal sage scrub is significant.

According to a study by the World Wildlife Foundation (available online at http://www.worldwildlife.org/wildworld/profiles/terrestrial/na/na1201_full.html), approximately 85% of the Coastal Sage Scrub has been lost, mostly to agricultural development and urban expansion. This project will destroy all of the remaining Coastal Sage Scrub on the site. The planting of new vegetation in open spaces and manufactured slopes, as proposed in mitigation measure MM BIO-4, is no substitute for the preservation of the original habitat.

Furthermore, coastal sage scrub is the natural habitat of the California gnatcatcher, a federally-threatened species. Removing the coastal sage scrub will adversely affect the habitat of the gnatcatcher. If any federal permit is required for the project (e.g. a Clean Water Act section 404 dredged-and-fill permit), the issuing agency will be required to formally consult with U.S. Fish and Wildlife Service prior to issuing the permit.

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Grading Plan would Fill Impermanent Streams in Existing Valleys on SouthWestern Portion of the Site. Section 3.5.3 says that the majority of the fill, from grading, would be placed within the quarry pit and in the existing valleys in the southwestern portion of the site. These valleys are probably impermanent streams protected by the federal Clean Water Act. Filling these streams with dirt may adversely affect water quality and habitat quality. Filling these valleys may require a CWA section 404 dredged-and-fill permit from the Army Corps of Engineers. This, in turn, may require the Corps to consult with U.S. Fish and Wildlife Service. None of this is disclosed in the EIR, as it should be.

E. Global warming analysis is inadequate because it sets the baseline too high

The baseline GHG emissions are calculated in Appendix C of the AQCCIA (which is itself Appendix B of the EIR). The result of that calculation is a baseline of 10,628 MTCO₂e/yr from both Rolling Hills Country Club and Chandler Ranch. Calculations for the latter include 8,862.5 MTCO₂e/yr from Chandler Ranch-related Off Site Vehicle Travel. Based on the assumption that Chandler Landfill off-site vehicle trips will be reduced to zero because of the closure of the Chandler Landfill, the EIR calculates that the project will provide a net reduction of 3,879 MTCO₂e/yr in Greenhouse Gas (GHG) emissions, according to table 3.2.14.

However, the GHG emissions from off-site vehicle trips will not in actuality be reduced to zero since the landfill's customers will need to dispose of their waste elsewhere. They will presumably use the Chandler Landfill due to a combination of low cost and close proximity. If the Chandler Landfill becomes unavailable for disposal, they will have to dump their waste elsewhere, quite likely farther away; if this is the case it will increase off-site vehicle miles traveled, not decrease them. This increase will be directly attributable to the project, and must be included in the analysis of the environmental effects of the project. Therefore, the proper method of calculation of the net GHG effect of closing the landfill would be to subtract the existing off-site vehicle travel miles from the projected off-site vehicle travel miles that will be required in order to dispose of the waste that is currently being sent to the Chandler landfill.

Even if it is assumed that there is no net increase in offsite vehicle miles traveled as a result of the landfill closure, and the 8682 MTCO₂e/yr (the amount of the current offsite vehicle miles travelled for disposal of waste at the Chandler landfill) is simply omitted from the baseline figure in the calculation, Table 3.2.14 would be revised as follows:

Source	Emissions (MTCO ₂ e/yr)
Construction Phase	113
Operation Phase	6,636
Baseline	-1946 (instead of -10,628)
Incremental Change	+4,803
SCAQMD Reporting Threshold	3,000
Exceeds Threshold?	YES

As this calculation shows, omitting the assumption that off-site vehicle miles for waste disposal will be reduced to zero by closing the landfill means that the project will result in significant increases in GHG emissions. The Draft EIR fails to provide the proper analysis of these increases because it wrongly assumes that GHG emission increases from the project are not significant. In particular, the Draft EIR provides for no mitigation of these effects. The Draft EIR also fails to adequately address cumulative impacts from increased GHG emissions. This section of the Draft EIR must be rewritten

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to incorporate realistic assumptions concerning the GHG emissions from vehicle trips related to the waste that would be disposed of at the Chandler landfill, if the landfill is closed.

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(cont.)

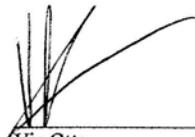
F. Conclusion

For the reasons set forth in this letter and the comments prepared by Haley and Aldrich on behalf of the PVPHA, it should be painfully obvious that the Applicant has failed to properly analyze the environmental impacts of this Project as Required by CEQA and related laws.

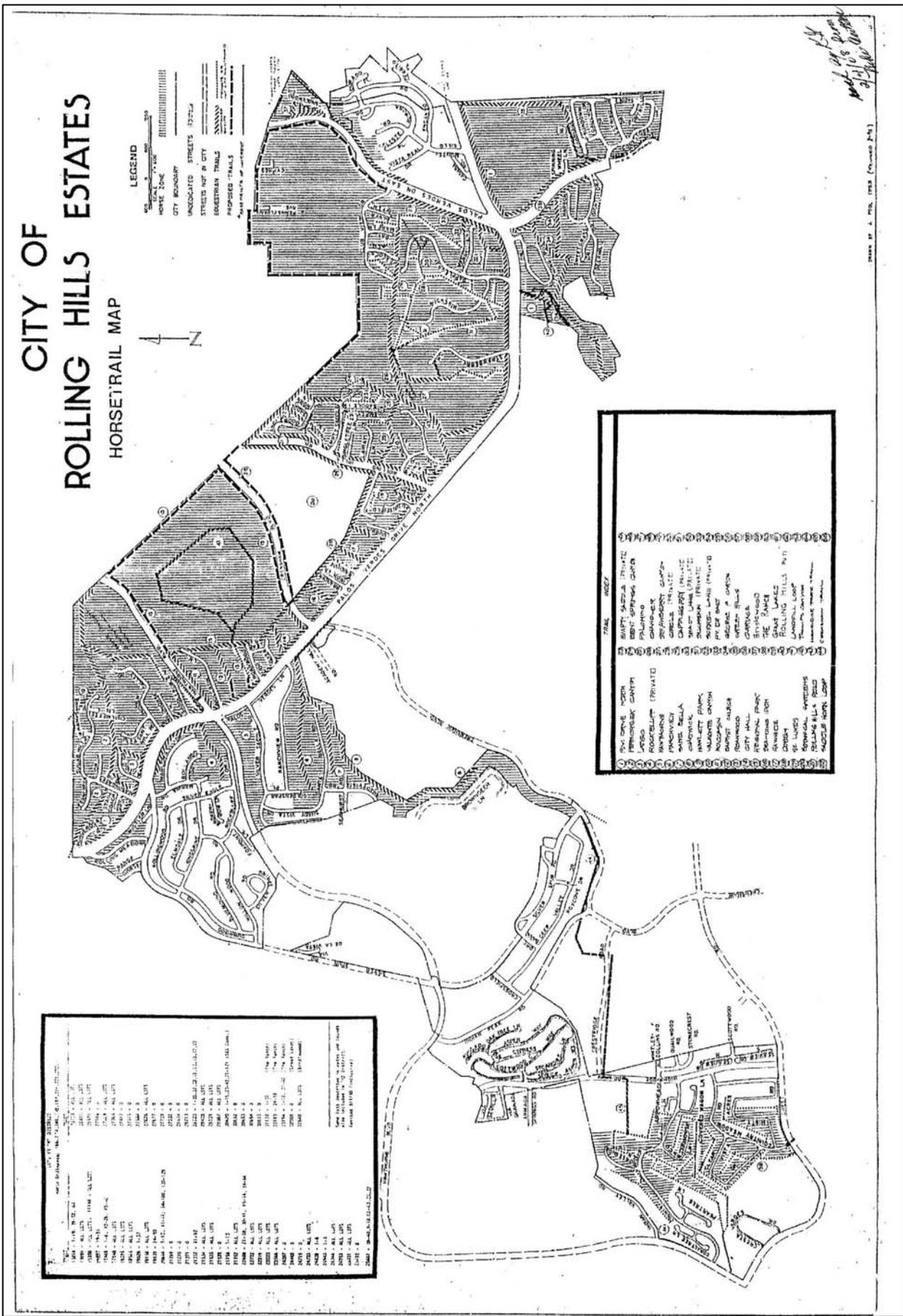
] HA-a9



Dale Allen,
President of PVPHA



Vic Otten,
VP Civic Affairs, PVPHA



RESPONSES

HA-a1: The transmittal and distribution requests are noted. No response is required.

HA-a2: The commenters provide opening remarks, emphasize that the proposed golf course would be a private facility, and express opinions, which are duly noted. No response is required.

HA-a3: The commenters provide a historical narrative of equestrian uses in Rolling Hills Estates. To clarify the discussion of General Plan land use designations, the Rolling Hills Estates General Plan designates a portion of the site for “Very Low Density Residential” uses and the balance of the site for “Commercial/Recreation” uses. The portion of the project site that currently is within the City of Torrance has a General Plan designation of “Public/Quasi-Public/Open Space”.

HA-a4: The commenters make reference to meetings at which neither City (lead agency) staff nor the EIR consultant attended. Regardless, the discussions of such meetings hold no bearing on the analysis of impacts in the EIR or the adequacy of the mitigation measures recommended therein.

In regards to the funding of the City’s Peter Weber Equestrian Center, the applicant is required to pay fees for park and recreational purposes. In 2008, the City Council adopted a fee of \$17,826.00 per single family residential unit for park and recreational purposes. The project will be subject to this fee with a credit given for the pocket park and recreational areas provided within the project. The City intends to use the fees collected by this and other projects to fund a new equestrian facility to replace the existing City-owned stables.

HA-a5: See Topical Responses 1 and 2.

The commenters incorrectly indicate that the DEIR was written by the project applicant. To clarify, the DEIR was written by an impartial, third-party consultant under contract to the City of Rolling Hills Estates. City staff provided relevant information to the EIR consultant during the preparation of the DEIR and conducted a comprehensive review of the DEIR prior to its publication for public review. The project applicant provided relevant project description and current uses/conditions information (e.g., project plans, engineering reports, historical Chandler facility operations data, descriptions of existing RHCC operations, etc.) during the preparation of the DEIR. However, the applicant did not write any portions of the DEIR and was not offered the opportunity to review the DEIR prior to its publication for public review. As such, the text in the DEIR does not represent the project applicant’s assertions or opinions but, rather, expresses facts and the professional judgment of the independent EIR consultant and the City of Rolling Hills Estates’ staff.

The commenters’ assertion that MM LU-1 does not commit the project to mitigation is incorrect. The commenters fail to acknowledge the active language in the measure, which states, “The project shall include an equestrian trail along Palos Verdes Drive East that is linked to an existing publicly-accessible trail(s) and that minimally extends to the City of Lomita’s Cypress Street Reservoir Site.”

HA-a6: In regards to the alleged limitations of the project’s biological resource studies, as stated in the General Biological Resources Assessment Report, “Additional species not observed, but expected to occur on the project site, may have been undetectable because of the timing of the survey, species seasonality (migratory patterns of birds), species daily activity patterns (diurnal,

crepuscular, or nocturnal wildlife), behavior (fossorial or burrowing species), and/or weather conditions (species that typically bask during sunny conditions or species associated with rainfall events [toads]).” In addition to conducting two site visits (Mike Wilcox with Willdan staff on August 14, 2007 and Matt Amalong and Mike Wilcox on September 7, 2007), a literature and records review was conducted to assist in determining the occurrence potential of special-status species in the project vicinity. Based on field reconnaissance, secondary source review, and knowledge of the plants and wildlife in Southern California and on the Palos Verdes Peninsula, the project biologists were able to adequately characterize the biological resources that exist on the project site. Multiple season surveys are not required to characterize the biological resources of a quarry and golf course with small remnant patches of disturbed habitat. See also response to comment CDFG-4.

In regards to the commenters’ suggestion that the applicant be required to restore all of the habitat that once existed on the site, CEQA requires an analysis of the changes in the existing conditions caused by a project and specifically does not require an analysis of conditions that once may have existed onsite. Specifically, the State CEQA Guidelines § 15125(a) requires that the project be evaluated against “the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced.” Furthermore, requiring an applicant to mitigate impacts that are not caused by the proposed project is not allowed by CEQA (see the discussion of “nexus” and “rough proportionality” in the State CEQA Guidelines § 15126.4[a][4]).

HA-a7: The commenters’ assertion that the loss of coastal sage scrub habitat should be considered significant is noted. However, the commenters do not provide any justification for this assertion, other than noting the percentage of coastal sage scrub habitat that has been lost throughout the world. The DEIR concludes the project’s impact on coastal sage scrub habitat is not significant for the following reasons:

1. Coastal sage scrub is not a designated sensitive natural community;
2. The coastal sage scrub habitat onsite is an isolated patch on a quarry bluff that is not directly or functionally connected to any other patches of similar habitat;
3. The functional value of the coastal sage scrub habitat onsite is limited due to its relative small size (1.5 acres) and its partially disturbed nature; and
4. The loss of coastal sage scrub habitat is partially mitigated by Mitigation Measure BIO-4, which required open-spaces and slopes in the proposed development to be planted with native species.

Since the above reasons are still valid and since the commenters provide no justification to conclude that the project’s impact on coastal sage scrub habitat is significant, the DEIR’s conclusion that the project’s impact on coastal sage scrub habitat is less than significant after mitigation remains unchanged.

In regards to coastal California gnatcatcher, see the discussion of under the heading *Coastal California Gnatcatcher* on page 3.3-6 of the DEIR, the discussion of Impact BIO-1 on pages 3.3-22 through 3.3-24 of the DEIR, and Mitigation Measure BIO-1.

Finally, the commenters incorrectly claim that the DEIR does not discuss the potential need for a Clean Water Act (CWA) Section 404 permit or the requirements for consultation with the U.S. Army Corps of Engineers (ACOE) or the U.S. Fish and Wildlife Service (USFWS). Section 3.3.3

Regulatory Framework provides a complete description of CWA permit requirements and the roles of the ACOE and the USFWS. Regardless, the commenters' claim that the project site may contain streams protected by the CWA is also incorrect. See the discussion under the heading *Physical Features of the Project Site* on page 3.3-3 of the DEIR. This discussion explains that the intermittent drainages onsite have been substantially modified by humans and are, most importantly, not connected to any navigable waters. Due to this lack of connection to navigable waters, the drainage features onsite cannot be subject to Section 404 of the CWA.

HA-a8: To address this comment and to utilize the most conservative analysis approach, updated greenhouse modeling was conducted as part of the updated AQCCIA. The results of this modeling are included in the revised discussion of Impact AQ-8 in the Recirculated Portions of the Draft EIR document.

HA-a9: The commenter provides closing remarks. The commenters' claim that the DEIR does not properly analyze the environmental impacts of this project is not substantiated by any evidence or factual information.

**LETTER FROM: PALOS VERDES PENINSULA HOESMENS ASSOCIATION, DALE ALLEN,
PRESIDENT AND JAMES T. WELLS, PhD, PG, HALEY & ALDRICH**

From: Dale Allen [mailto:daleallen39@cox.net]
Sent: Monday, June 29, 2009 1:16 PM
To: Niki Cutler
Subject: Comment_Letter_June_2009.pdf - Adobe Reader

Ms. Niki Cutler,
Please find attached the comments Letter Mr. James T. Wells, PhD, PG for the firm of HALEY &
ALDRICH. The letter was prepared on behalf of the Palos Peninsula Verdes Horsemens
Association (PVPHA) to address the Draft Environmental impact Report for the proposed
Chandler Ranch/Rolling Hills Country Club Project.

HA-b1

Sincerely,
Dale Allen
President
PVPHA



Haley & Aldrich, Inc.
3700 State Street
Suite 350
Santa Barbara, CA 93105

Tel: 805.563-8600
Fax: 805.682.5126
HaleyAldrich.com

June 29, 2009

Niki Cutler, AICP,
Principal Planner
Rolling Hills Estates City Hall
4045 Palos Verdes Drive North
Rolling Hills Estates, CA

Subject: Comments on Draft Environmental Impact Report for the
Proposed Chandler Ranch/Rolling Hills Country Club Project

Dear Ms. Cutler:

I am writing on behalf of the Palos Verdes Peninsula Horseman's Association with comments on the April 2009 Draft Environmental Impact Report for the Proposed Chandler Ranch/Rolling Hills Country Club Project ("Draft EIR"), State Clearinghouse Number 2008011027. The Draft EIR is deficient in its analysis of potential for the proposed project to deplete groundwater supplies and in its analysis of potential dangers related to subsurface contamination at the project site.

I am an environmental geologist with over 17 years of experience evaluating contamination in soil and groundwater. I am a Vice President of Haley & Aldrich, an environmental consulting firm. I am a Professional Geologist (CA PG #7212), licensed by the California Board for Geologists and Geophysicists. I received a Ph.D. in Geological Sciences from the University of Washington in 1990. I received a Masters of Science Degree in Geological Sciences from the University of Washington in 1986. I received a Bachelor's Degree in Earth Sciences from Dartmouth College in 1981. I am a member of the Editorial Board of the journal, *Environmental Forensics*, a quarterly peer-reviewed scientific journal of national and international circulation. In this role, I evaluate the work of others through regular peer-review of manuscripts submitted for publication to the journal. I am the author and coauthor of scientific publications related to geology and groundwater, including the recently published forensic review articles in *Environmental Science & Technology* (U.K. Edition) Special Issue dedicated to Environmental Forensics.

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Groundwater Depletion

There can be little debate that here in California, water is a precious, but scarce, resource. For decades, our State and local governments have been led the nation in efforts to preserve both the quality and the quantity of our water resources. The resulting regulatory framework is clear: the water resources of the State must be vigorously protected. In this era of global warming, these efforts take on even greater importance as climate models predict a diminishment of surface water resources in California due, in part, to predicted changes in both the amount and timing of the Sierra snowpack, thus in the amount of annual snowmelt that supplies so much of the water that we rely upon in California. Especially in light of the predicted decline in surface water resources due to global warming, existing *groundwater* resources are exceptionally valuable and this project will deplete groundwater supplies.

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As noted in the Draft EIR, the project would have significant impact if it would “substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level...” The Draft EIR correctly identifies this issue as a significant impact. However, the proposed mitigation measure is inadequate because it does not insure that the impact will actually be mitigated. In Section 3.7.2 (Existing Conditions, page 3.7-11) the authors note that the 20-acre quarry pit has a capacity of 200 acre-feet and later in the section the report notes that filling in the quarry will reduce the amount of water that infiltrates into the groundwater (p. 3.7-33).

Importantly, the report acknowledges that the annual volume of water that percolates into the groundwater is unknown (p. 3.7-12). How can we have confidence in a proposed measure that promises to mitigate an impact of unknown magnitude. Indeed, the associated mitigation measure (MM HYD-9) provides no basis whatsoever for assessing whether the depletion of groundwater resources will be mitigated should the project be built. The mitigation measure simply calls for the applicant to investigate whether surface-applied water would infiltrate from the finished project surface into the aquifer used by the on-site well. Seemingly, the applicant will only need to show that one drop of surface water percolates into the soil and makes it to the groundwater, and that somehow proves that the unknown volume of water infiltrating from future “passive infiltration basins” (i.e. golf course water hazards) will equal the unknown volume of water currently recharging groundwater resources from the site. The illogic of this is obvious: the applicant does not know how much groundwater recharge is occurring now and the applicant will not know how much groundwater recharge would occur after the project is completed. How can any authoritative statement be made about whether or not this impact can be mitigated?

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(cont.)

The applicant is obligated to mitigate the acknowledged impact to groundwater resources and it will require significant and careful studies of the pre-development and post-development infiltration capacity in order to satisfy this obligation.

Finally, even considering the inadequate mitigation measure (MM HYD-1) proposed in the Draft EIR, if the applicant carried out a truly careful study of “whether surface-applied water would infiltrate from the finished project surface into the aquifer used by the on-site well” I suspect that the finding would be negative, thus demonstrating that this impact will not be corrected by the proposed mitigation measure. Currently, the quarry serves as a centralized source of recharge. The proposed project would remove this source of recharge and make other changes to the topography of the site, all resulting in runoff from natural rainfall being distributed more widely across the site. This, in turn, allows significantly more water to be lost to storm water runoff and evapotranspiration. Based on my professional experience and judgment, I do not believe that the diminished and widely-distributed recharge from the proposed project would provide any measurable water to the underlying aquifer. In any case, it will require a lengthy and costly study to evaluate this question.

Subsurface Contamination

This proposed project entails developing a property that contains a waste landfill, and abandoned oil wells and oil-field sumps. It is a certainty that these activities left a legacy of

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**HALEY &
ALDRICH**

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Page 3

subsurface contamination. As proposed, the project does not envision removing or remediating the subsurface contamination, rather the applicant is simply content to build homes for people that may overlie the subsurface contamination. Considering the history of this site, the Draft EIR is cavalier in the manner that it addresses potential dangers posed to future occupants from this subsurface contamination. For example, the water supply for this project will include pumping groundwater from an on-site well. How much contamination of groundwater was caused by the landfill? This issue is poorly understood. Even more poorly understood is how much more impact to groundwater quality, if any, may be expected due to inherent changes in the hydrogeologic system after the project is completed and whether or not the groundwater to be used by the project may become contaminated, thus exposing occupants to hazardous chemicals in their water to be used for drinking, bathing, watering their lawns and irrigating the golf course.

Although the operator of the landfill has been required to monitor groundwater quality by the Regional Water Quality Control Board (RWQCB), this monitoring program was cursory and flawed. The monitoring program included a requirement to test groundwater from upgradient and downgradient of the landfill in hopes of detecting changes in groundwater quality due to contamination leaching from the landfill. Amazingly, a review of RWQCB files for the landfill, demonstrates that for many years the landfill operator did not even know which way the groundwater flows (Justice and Associates, February 2000, Technical Report: Monitoring for Groundwater Impacts, p. 2: northwesterly groundwater flow direction previously had been reported but now Justice says that was a mistake and the flow direction is northeast). Then, just a few months later, the landfill operator reported to the RWQCB that they were wrong again and the real groundwater flow direction is to the east (Justice and Associates, August 2000, Technical Report: Revised Groundwater Monitoring Program). Obviously, it is impossible to design an upgradient-downgradient monitoring network if one does not know which direction is upgradient and which direction is downgradient. The RWQCB acknowledged this deficiency in its Waste Discharge Requirements for Chandler's Landfill, dated 2000:

“However, because the background well is located at the side gradient of the landfill and the two detection wells are not screened in the shallowest groundwater, the monitoring system needs to be upgraded to ensure that it can detect water quality changes if pollutants are released from the landfill to groundwater.” (RWQCB Order No. 2000-29, paragraph 8)

The “upgraded” monitoring system included downgradient wells 400-ft and 1,000-ft from the waste. It would take 1 to 3 years (or more) for groundwater to migrate from the landfill to these monitoring wells: hardly sufficient for providing early warning of a release of contamination.

This issue is not considered seriously in the Draft EIR, perhaps because Chandler's Landfill is described as an “inert” landfill: accepting only construction debris and other non-hazardous wastes. Myriad experiences around the country have sadly proven that bad things can end up in “inert” landfills. The lead-contaminated soil episode at Chandler's Landfill illustrates how this can happen. In the year 1999, Chandler's Landfill accepted over 1,200 tons of soil thought to be clean but that turned out to be heavily contaminated with lead. This violation

HA-b4
(cont.)

**HALEY &
ALDRICH**

June 29, 2009

Page 4

was not detected until after the soil had already been dumped into the landfill. As much of this soil as could be found was subsequently removed from Chandler's landfill and re-disposed at an appropriate Class II landfill. However, this episode illustrates that so-called "inert" landfills are not necessarily benign in terms of the presence of hazardous chemicals. The fact that lead has been detected in groundwater near the landfill at concentrations at least as high as 12 ppb (well above the California Public Health Goal of 2 ppb) may be related to this or similar episodes in the past of hazardous materials being dumped into the landfill. Even "inert" materials that are allowable in Chandler's Landfill are not necessarily inert and not necessarily environmentally benign. It is allowable to dump asphalt into Chandler's Landfill. Environmentally, asphalt is a troubling material. We obviously use asphalt on our roads and highways, but a spill from an asphalt refinery is treated as seriously as a spill of any other petroleum product. Indeed, if it were not for the petroleum exclusion, some asphalts would need to be classified as hazardous wastes due to the abundance of polynuclear aromatic hydrocarbons (PAHs). Some PAHs are known or suspected carcinogens. Thus it was entirely acceptable to dump a material into the Chandler's Landfill that contains known or suspected carcinogens. This material is still in the landfill: the applicant is proposing to leave it in place and homes and yards and backyard gardens may be built over this material.

HA-b4
(cont.)

The RWQCB established Water Quality Protection Standards (WQPS) for the landfill. If concentrations exceeded the WQPS, that was to be considered evidence of a release of contamination from the landfill. In fact, groundwater sampled as part of the landfill's monitoring program have routinely exceeded their respective WQPS values for total dissolved solids, sulfate and chloride. Thus, using the RWQCB's standards, there is ample evidence that the landfill has, in fact, contaminated groundwater at this site.

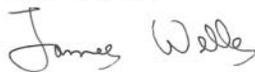
A number of residential developments at old California oil fields have experienced significant problems with soil and soil vapor contamination seeping into homes. The Draft EIR recognizes the need for re-abandoning the old oil wells at the site. In addition to properly re-abandoning the old oil wells, it would be prudent to conduct a thorough investigation of potential soil contamination at the well-heads and the former sumps. Former sumps are frequently highly contaminated with residual petroleum hydrocarbons as well as a broad suite of other contaminants such as heavy metals from drilling mud used for drilling the oil wells. This situation can probably be mitigated, but the required mitigation is not adequately addressed in the Draft EIR. Mitigation will require a more thorough subsurface investigation to identify the nature and extent of subsurface contamination, and quite possibly soil and/or groundwater remediation.

HA-b5

Thank you for the opportunity to provide comments on the Draft EIR for the Proposed Chandler Ranch/Rolling Hills Country Club Project.

HA-b6

Sincerely yours,



James T. Wells, PhD, PG



RESPONSES

HA-b1: The transmittal is noted. No response is required.

HA-b2: The commenter provides opening remarks and introduces several alleged inadequacies of the Draft EIR, which are detailed in later paragraphs of the comment letter. Corresponding responses are provided below.

HA-b3: This comment appears to interpret a restatement of the significance threshold as a statement of the project's actual impacts to groundwater supply. Instead, the Initial Study prepared for the project identified groundwater depletion as a potentially significant impact resulting from filling in the existing quarry, which has appeared to function as a passive and informal infiltration basin. The Initial Study further stated that the EIR would evaluate whether or not such an impact existed. To determine whether storm water detained by the quarry pit was an important contributor to local groundwater, the EIR preparers researched publicly available information from local water resource management agencies. This research yielded no evidence showing that filling the quarry would adversely affect groundwater replenishment exceeding the significance threshold.

The analysis on pages 3.7-33 to 3.7-34 of the Draft EIR relies on and references published documentation from both water resource trustee agencies, the Metropolitan Water District (MWD) and the Water Replenishment District of Southern California (WRD). These sources indicate that the surface recharge areas for the aquifers in the West Coast Basin, particularly the highest-producing Silverado aquifer, are located in the northeast area of the Central Basin, more than 15 miles from the project site, and that aquifers underlying the project site are largely recharged through lateral groundwater movement rather than from surface water percolation. The injection well arrays northwest and southeast of the Palos Verdes Peninsula provide additional groundwater recharge (see DEIR Figures 3.7.2 and 3.7.3). Moreover, the aquifers in the vicinity of the project site, the Gage, Lynwood, Silverado, and Sunnyside Aquifers, lie between 20 to 800 feet below the ground surface, and are separated from the surface and from one another by impermeable layers (aquitards). Consequently, water infiltrating from the surface on the project site is unlikely to reach any aquifer except the Gage Aquifer (see DEIR Figure 3.7.3). Furthermore, water infiltrating from the surface of the project site is particularly unlikely to reach the Silverado Aquifer, which the MWD identifies as the most productive aquifer in the West Coast Basin, as this aquifer is approximately 400 feet below ground surface in the vicinity of the project site and separated from the surface by three aquitards (see page 3.7-5 and Figure 3.7.3 of the DEIR).

Both the MWD and the WRD were consulted in preparing this Draft EIR, and neither has stated that the Chandler quarry is a significant contributor, or contributes at all, to groundwater recharge. Both agencies conduct regular, extensive studies to assess the region's groundwater quality and quantity. Neither agency submitted comments in response to the NOP or Draft EIR expressing concern for a potential loss of groundwater recharge. (Of the two, only the MWD provided comments on the Draft EIR, commenting that the proposed project "is not regionally significant to Metropolitan" but that water conservation measures were encouraged [see letter dated June 5, 2009, from Delaine W. Shane, Manager, Environmental Planning Team, MWD, to Niki Cutler, Principal Planner, City of Rolling Hills Estates, as included as letter "MWD" of this FEIR and the corresponding responses]). Thus, it is reasonable to conclude that filling the Chandler quarry would not substantially affect groundwater recharge.

Nonetheless, because anecdotal observations suggest that water infiltrates into the site's subsoil (Chandler quarry operators and others have observed that accumulated stormwater dissipates within a few days after rainfall), it is also reasonable to enable continued infiltration, particularly if that water reaches the shallowest aquifer. Mitigation Measure HYD-9 addresses this contingency. The commentor requests "significant and careful studies of the pre-development and post-development infiltration capacity." HYD-9 requires the final geotechnical report to assess infiltration capacity post-development, particularly to investigate whether water would reach the aquifer that the on-site well penetrates.

Competing needs, however, including the safety of properties north – and downhill – of the site, may limit whether infiltration should be pursued at this location. Therefore, HYD-9 directs that infiltration facilities be incorporated, if they can be reasonably predicted to function safely. Additionally, "CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commentors," particularly in light of evidence to the contrary (CEQA Guidelines § 15204[a]). Here, the evidence suggests that the quarry is not a major contributor to groundwater supply, but might be a minor one. Accordingly, HYD-9 sets forth a contingent mitigation strategy: if designing and constructing infiltration basins according to current engineering practice would mitigate the impact of removing a minor informal and passive infiltration facility, the applicant will be required to construct them. If, however, the geotechnical study predicts that intentionally-constructed infiltration basins would not appreciably contribute to groundwater recharge, and/or would endanger properties below, then the competing interest of public safety should prevail over maintaining on-site infiltration capacity, and infiltration basins not be constructed.

HA-b4: The potential for hazardous waste contamination of the project site as well as the potential for groundwater contamination were addressed in the EIR. A Phase I ESA was prepared by FREY Environmental (September 2004) to assess the potential for hazardous materials to be present on the project site. The results of the Phase I ESA are summarized in the EIR. Based on the findings of the Phase I ESA, a Phase II subsurface soil investigation was conducted by the same firm in 2005. The results of the Phase II subsurface soil investigations are also summarized in the EIR.

Various soil samples were collected and analyzed for both the Chandler (landfill portion of the project site) and the golf course property as part of the Phase II investigations. According to the results of these investigations, it was determined that total petroleum hydrocarbons, BTEX and fuel oxygenates are not present in the subsurface soil in areas investigated at the project site. It was further determined that there is a low likelihood that soils and/or groundwater have been significantly impacted as a result of releases from the facilities investigated at the site. It should also be noted that the only proposed use of groundwater extracted onsite is for irrigation of the proposed golf course (i.e., non-potable use), as is currently the case with the existing golf course.

HA-b5: As indicated in the EIR, there are five abandoned oil wells on the project site. Their locations are all in areas where golf course uses are proposed, except that one well is located to the rear of proposed residential lots 9 and 10. The wells onsite include: Narbonne Well No. 1 (1925), Chandler/McBurney Well #1 (1954), Chandler Well #2 (1956), Chandler Well #3 (1965), and Chandler Well No. 13 (1966). All of the wells have been abandoned and sealed in years past and are recommended in the EIR to be re-abandoned in accordance with Californian Division of Oil, Gas, and Geothermal Resources (DOGGR) and County of Los Angeles requirements prior to development of the project. These recommendations are discussed in MM HAZ-1.

In regards to potential soil contamination in the vicinity of the abandoned wells, it should be noted that these oil wells were exploratory wells only and were not used for oil extraction purposes. Operational activities leading to potential soils contamination at the wellhead locations were minimal to non-existent. In addition, MM HAZ-1 addresses the issue through the DOGGR review and approval process which normally requires a soils investigation be conducted as par of the well re-abandonment process.

HA-b6: The commenter provides closing remarks. No response is required.

LETTER FROM: PORTUGUESE BEND RIDING CLUB, LISA WOLF, OWNER AND LAURA FELDMAN, MANAGER

From: LAURA FELDMAN [mailto:pbrc1@verizon.net]
Sent: Tuesday, June 30, 2009 7:53 AM
To: Niki Cutler
Subject: Chandler Redevelopment Project Impacts Equestrians

To Whom it May Concern:

As a horse owner and enthusiast in Rancho Palos Verdes I am very upset about the possibility of losing the trails and/or the proper zoning for horsekeeping in the plans to expand the RH Country Club and new house builds from closing the quarry. It seems to me that horses have been a huge part of the hill from day one and it is not unreasonable to expect that they will continue to be a part of the hill forever. With that said I believe that horsekeeping and preservation of trails should be a part of whatever new development is submitted for approval.

} PBRC-1

Regards,

Lisa Wolf
Owner
Portuguese Bend Riding Club
and
Laura Feldman
Manager
Portuguese Bend Riding Club

RESPONSES

PBRC-1: The commenters' concerns and opinions regarding horse keeping and equestrian trails are duly noted. See also Topical Response 1.

LETTER FROM: MITRA ABEL

From: MIRTA ABEL [mailto:mirta@ambitpacific.com]
Sent: Thursday, June 25, 2009 1:21 PM
To: Niki Cutler
Subject: Chandler Redevelopment Project

To Whom it May Concern:

I am a homeowner in Palos Verdes and I am writing because I am concerned that the Chandler Redevelopment Project is omitting the equestrian trails and I am requesting that the equestrian trails be added to the development project before it is approved. I would like the horsekeeping and trails to be preserved as in the current zoning code and the City General's plan.
We love living in the Rolling Hills and enjoy the equestrian trails.

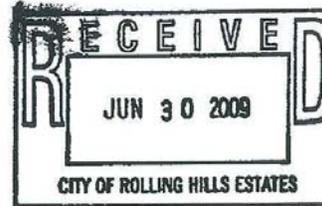
MA-1

Thank you,
Mirta Abel
310.901.2298

RESPONSES

MA-1: The commenter's opinions, concerns, and requests to include equestrian trails and horse keeping are duly noted. See also Topical Response 1.

LETTER FROM: STACEY ARAI



June 30, 2009

To: Niki Cutler, AICP, Principal Planner, Rolling Hills Estates City Hall
4045 Palos Verdes Drive North, Rolling Hills Estates, CA

From: Stacey Arai-member PVPHA
4029 Via Pima
Palos Verdes Estates, CA

Regarding: Chandler Ranch Subdivision

Dear Ms. Cutler,

I am writing to you as a resident of the Palos Verdes Peninsula, concerned equestrian and member of the PVPHA. I understand the Chandler Redevelopment Project threatens to negatively impact the equestrian community on the hill. I would like to see horsekeeping and equestrian trails be preserved according to the current zoning and the City's General Plan. While development is inevitable, it can be done responsibly while preserving the integrity of the community in which it resides. Please make the necessary provisions that will ensure the protection of the equestrian trails for future of our community. Thank you for your time.

SA-1

Sincerely,

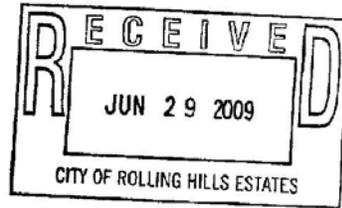
Stacey Arai

RESPONSES

SA-1: The commenter's opinions, concerns, and requests to include equestrian trails and horse keeping are duly noted. See also Topical Response 1.

LETTER FROM: THE BEACHLER FAMILY

The Chandler Ranch Subdivision



As a resident of Rolling Hills Estates for over 47 years, we are against any change to the City's General Plan.

In today's world it is rare to find a city in Los Angeles County that dedicates itself to the keeping of horses and maintains a trail system.

This proposed subdivision of 114 homes would not only change the 'preserving low density and rural character' of Rolling Hills Estates but would remove the area known as the Horse Overlay Zone.

My family moved to Rolling Hills Estates to enjoy a rural life with the wild and domestic animals and birds. We would like to continue the equestrian life of horse keeping and trail riding. Do not change the General Plan.

BF-1

The Beachler Family

RESPONSES

BF-1: The commenters' opinions, concerns, opposition to amending the City's General Plan, and requests to maintain equestrian trails and horse keeping in Rolling Hills Estates are duly noted. See also Topical Responses 1 and 3.

LETTER FROM: LORI BECK

From: Lori Beck [mailto:LoriBeck@NaturesBest.net]
Sent: Saturday, June 27, 2009 3:44 PM
To: Niki Cutler
Subject: chandler preserve

Dear RHE,
Why would our city change the existing zoning code now? Please vote for homes where people can have horses if they want to. DO NOT let them build 114 homes, its way too many. Let's keep our beautiful city rural and not over build it. I've grown up on the hill; have lived here for 40 years. I love our city, and am so darn proud of it. Please, please, please keep it horsey and not over built.

LB-1

Thank you,

Lori Beck
36 Ranchview Road
RHE

RESPONSES

LB-1: The commenter's opinions, requests to include horse keeping, and concerns for the project's density and character are duly noted. See also Topical Responses 1 and 3.

LETTER FROM: MONICA BROWN

From: Monica Brown [mailto:horsesnsun@msn.com]
Sent: Tuesday, June 30, 2009 6:27 PM
To: Niki Cutler
Subject: Proposed Chandler development

To whom it may concern,

The proposed Chandler development for the private country club and 114 "cluster homes" will require removing land from the equestrian community which is vital in preserving the rural and equestrian atmosphere. It will be a grave mistake forever altering our community.

MB-1

Sincerely,

Monica Brown
Concerned Equestrian

RESPONSES

MB-1: The commenter's opinions and concerns regarding removing land from the Horse Overlay Zone and preserving the rural and equestrian atmosphere are duly noted. See also Topical Responses 1 and 3.

LETTER FROM: STEVE DEMING

From: Deming, Steve @ South Bay [mailto:Steve.Deming@cbre.com]
Sent: Tuesday, June 30, 2009 12:26 PM
To: Niki Cutler
Subject: Chandler Development

Rolling Hills Estates City Council and Staff

I am outraged that you would even consider the approval of a development within the horse overlay zone that would reduce the focus and the intent of the unique charter that we enjoy to preserve horse keeping and enjoyment. Please consider The Trail.....

THE TRAIL

Where I live there is a trail
that runs along the side

The Gabrielino lived there
for centuries they'd ride

The place was built in forty
We came in fifty-six

Since then, there have come houses
... mortar, stone and bricks

Still we rode the hillsides
though each year we lost

A stretch of our great freedom
a meadow, stream, the cost

A vista of the ocean
a place where eagles nest

The fences kept encroaching
new houses crowned the crest

Many of our friends moved north
where they hoped to ride

But faithfully we rode our trail
...the one along the side

We knew it was protected
that it would always be

SD-1

The government demanded it
of course... it was decreed

An easement was required
where we had always gone

No one could destroy the trail
it just could not be done!

But then... a bramble bush
would choke with thorny vine

A small section of the trail
the council had divined

A driveway would expand to
where the trail had been

A pool would be permitted
and... the trail would lose again

One day a shiny steel contraption
raised to block the path

Not in some obscure outcrop
...it cut the trail in half

I remember once a man had stood
in council... and he said

That surely in our lifetime we
would grieve a trail long dead

One day the trail protected would
be lost... and that maintained

Would fall into neglect because
of disregard, disdain

Should I say, "Goodbye my friend"
and let you die this way

Or should we ask our neighbors
to give your life a stay

....Goodbye my friend!

SD-1 (cont.)

- Steve Deming

Steve Deming | First Vice President | Lic. 516090
Multifamily Residential Land
CB Richard Ellis | Broker Lic. 00409987 | Brokerage
990 West 190th Street, Suite 100 | Torrance, CA 90502
T 310 516 2363 | F 310 516 2310 | C 310 871 6300
steve.deming@cbre.com | www.cbre.com/sdeming

RESPONSES

SD-1: The commenter's opinions and concerns regarding removing land from the Horse Overlay Zone, the potential loss of a future equestrian trail, and preserving the rural and equestrian atmosphere are duly noted. See also Topical Responses 1 and 3.

LETTER FROM: KIMBERLY FAIRCHILD

From: Kimberly Fairchild [mailto:kimberly@rivierafunding.com]
Sent: Tuesday, June 30, 2009 3:32 PM
To: Niki Cutler
Subject: Private Golf Club and Cluster Housing

Kimberly Fairchild

June 30, 2009

25207 Loytan Street
Torrance, Ca. 90505
310-941-2993

To Whom It May Concern:

The rural environment that has been established and maintained would suffer greatly from this proposed Private Golf Course and "cluster" housing. The city should rule against allowing developers to create a closed neighborhood that would disconnect the trail system. The charm and beauty of the city is the rural equestrian atmosphere, trails and open spaces.

The developers don't care about the community, the horses or the small town atmosphere. They don't care that kids can still safely go to General Store and get ice cream and candy and put it on there parents tab to be paid for later. People won't be moving to Rolling Hills to enjoy its uniqueness. They will come to live on a golf course in a golf course community that is segregated from the rest of the rural nature of the city. Development will not stop, but how the city is developed can be controlled.

Please do not remove the development from the horse overlay zone, require all properties to be built with a barn and on a trail system that runs throughout the development, require no existing trails to be disturbed. Make sure that the uniqueness and beauty of Rolling Hills is preserved for the current community and the for the communities in the future. Again, development will happen but make the developers work with the environment not destroy the environment. Rolling Hills is a small town surrounded by a huge metropolitan city. It's a very rare community to find with in Los Angeles. That's what makes your city so valuable. Protect it!

Sincerely,
Kimberly Fairchild

Kimberly Fairchild
mortgage consultant
cell: 310 941 2993
Direct: 310 802 4649
fax: 310 373 7503

KF-1

RESPONSES

KF-1: The commenter's opinions and concerns regarding removing land from the Horse Overlay Zone, the potential loss of a future equestrian trail, and preserving the rural and equestrian atmosphere are duly noted. See also Topical Responses 1 and 3.

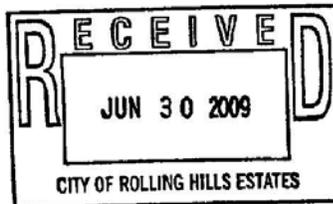
LETTER FROM: WILLIAM FOX

Chandler Project Letter 06 30 09.doc

Page 1 of 2

WILLIAM A. FOX
 64 Dapplegray Lane • Rolling Hills Estates, CA 90274-4240 USA
 310-530-4369 • 509-693-2178 eFax • wfox@aridiantech.com

City of Rolling Hills Estates
 Attn: Niki Cutler, Principal Planner
 June 30, 2009



RE: Chandler Project

Hi Ms Cutler,

I met you at one of the meetings along this journey but I am sure you would not remember me. I am a resident of Rolling Hills Estates since 1995 and current owner of two homes here – one on Dapplegray (backing up to the RHCC), one in Larga Vista which is currently rented and a previous residence on Buckskin Lane. I have had several “tours of duty” as a Board member of the DLPOA although currently enjoying retirement from the board. The Rolling Hills Country Club actually leases some of my property for the enormous fee of \$25 per year. The corresponding property taxes of \$4,000 for said property creates stimulating conversations at local parties.

Having said that, I am not a golfer, (but appreciate the game-just not good at it) I am not an equestrian (we moved here because we love them but more so the people and energy they bring) and when actually trying to identify what type of person I am for you – discovered that I guess I am really an “anti-growth” person. Wow – who know that the Chandler project would propel me into self discovery? As an owner of several successful international businesses, give and take is a normal process that I am quite good at. While there is an appreciation of the job you currently possess, I am stunned and amazed that this project has grown any legs at all!!!

WF-1

I recall in one of the meetings I attended while you were present along with Mike Cope, Project Director for the Chandler Project, I asked you and Mr. Cope to give a few bullet points for me.

My question was,

" What can you tell me, as a resident of Rolling Hills Estates, would make me jump up and down with joy about this project."

Mr. Cope said, "This is not the meeting for that" and you declined to answer that for me as well. Still haven't been able to get clarity on this issue.

I think the fact that this cannot be answered with any logic is the key!!! Mr. Cope shared with me after one of the meetings that the Chandler "kids" did not really need to do this project. The current use as a dump still has over a 20 year life span and they make good money as is. Knowing this just solidifies my position that this **should not be considered**.

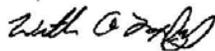
I will not go into detail or debate this as many others have done so after reviewing the fantasy labeled "EIR".

My understanding of what all employees and volunteers of The City of Rolling Hills Estates should stand for – **is the protection of the residents and the Equestrian way of life**. I call on all involved with the City to do your job and shoot this project in the head like the injured horse that it is --- and forget these ridiculous compromises that are being put forth.

I am hopeful that cooler heads will prevail and this is STOPPED!!!

DO YOUR JOB AND PROTECT RHE!!!!!!!!!!!!

Respectfully,



William A Fox

WF-1
(cont.)

RESPONSES

WF-1: The commenter's opposition to the project and concerns for preserving the equestrian atmosphere are duly noted. See also Topical Response 3.

LETTER FROM: CATHY & DENNIS GARDNER

From: Cathy & Dennis Gardner [mailto:gardner4@earthlink.net]
Sent: Tuesday, June 30, 2009 12:39 PM
To: Niki Cutler
Subject: CHANDLER RANCH SUBDIVISION

Good Afternoon,

I am writing in support of sticking to the existing building requirements for lot coverage and maintaining equestrian trail system in regards to Chandler Ranch Subdivision.

There is no reason good enough to abandon the proven wisdom of Rolling Hills Estates city founders.

If it is for the sake of needed tax revenues, I personally recommend cutting City costs and increasing revenues (concession) at the Peter Weber Equestrian Center submitted to RHE Equestrian Budget Committee.

Do not sacrifice the main reason we love this City and makes us BETTER than our neighbor Cities.

Thank you for your consideration,

Cathy & Dennis Gardner

3 Santa Bella Road

Rolling Hills Estates

CDG-1

RESPONSES

CDG-1: The commenter's opposition to the project and deviating from the City's planning documents are duly noted. See also Topical Response 1.

LETTER FROM: SUSAN GARMAN

-----Original Message-----

From: Scott & Susan Garman [<mailto:sandsgarman@cox.net>]
Sent: Friday, June 26, 2009 8:15 AM
To: Niki Cutler
Subject: Chandler Plan

City Managers,

I am writing to ask that equestrian trails to be part of the development of the Chandler plan BEFORE it is approved. Preserving both horsekeeping and recreational trails are critical factors to maintaining the special atmosphere and community of Rolling Hills. Please approve this development according to the current zoning and the City's General Plan.

Thank you for your consideration,
Susan Garman

SG-1

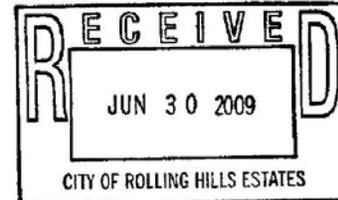
RESPONSES

SG-1: The commenter's opinions, opposition to deviating from the City's planning documents, and requests to maintain equestrian trails and horse keeping in Rolling Hills Estates are duly noted. See also Topical Responses 1 and 3.

LETTER FROM: VIRGINIA GERISCH

June 27, 2009

From: Virginia Gerisch
83 Buckskin Lane
Rolling Hills Estates, Ca. 90274



To: Niki Cutler, AICP
Principal Planner
Rolling Hills Estates City Hall
4045 Palos Verdes Drive North
Rolling Hill Estates, Ca. 90274

Re: Chandler Development
EIR Draft

As a resident of RHE since 1972, I have increasing concern regarding what appears to be high growth, high density mentality and lack of concern by city government to preserve our rural way of life now challenged by the proposed Chandler Ranch Development and removal of the area from the horse overlay zone.

While city government expresses an equestrian way of life it is not willing to stand up for it but rather bow to the wooing of developers and big money - a "selling of the city".

When our family moved to RHE 37 years ago, we did so to enable our daughter to enjoy a unique experience - horsekeeping in our backyard a memory she cherishes to this day and a memory envied by her peers.

What is the "plan" for the city? With condo after condo going un-sold in peninsula center and many more on the drawing board. Are we headed where Torrance has already gone?

With five golf courses on our small peninsula we would seem to be on golf course overload, especially in light of the fact most course uses are non-residents. Why will they flock to a Lomita adjacent course the view, the Lomita cuisine and lodging? These revenues will be elsewhere and should the project fail at some point, is the city prepared to bail out the project as RPV/ Terrencea?

The impact of the major loss of natural trees and vegetation displacement and eventual demise of wildlife, including our long-standing snowy egret is yet to be known-what we do know is that the city is willing to trade an invasive way of life for an upscale tract of Tuscan mini mansions with pavers and pools - horse lovers need not apply.

I urge the city to stand for what they claim to be advocates the rural way of life.

Sincerely,


Virginia Gerisch

VG-1

RESPONSES

VG-1: The commenter's concerns for growth and maintaining the rural character are duly noted. See also Topical Response 3. In regards to the commenter's assertion that, "the impact of the major loss of natural trees and vegetation displacement and eventual demise of wildlife...is yet to be known", Section 3.3 *Biological Resources* of the DEIR along with the project's *Biological Resources Assessment* and *Tree Inventory and Management Plan*, which are included in Appendix C, provide a complete analysis of the project's potential impacts on trees, vegetation, and wildlife.