



Laguna Greenbelt, Inc.

a non-profit corporation

May 19, 2008

Laguna Beach City Council  
Laguna Beach Planning Commission

RE: Scoping hearing for Aliso Creek Area Plan

This portion of Aliso Canyon, in the vicinity of the proposed Athens Group development, is a vital connection to the Laguna Greenbelt, Aliso & Wood Canyons Wilderness Park, and the Aliso Creek Mountains to the Sea recreational trail system. The steep canyon walls, unique geology, rare native plant communities, and stunning beauty are significant and irreplaceable assets to the city of Laguna Beach and the surrounding region. Because of the geographical and ecological significance of the area, it is entirely appropriate to assess project alternatives with community objectives, using a broad range of alternatives.

We suggest you broaden the city objectives for the project to include the following six:

- 1) Avoid General Plan Amendments to accommodate the project, as the current GP reflects a broad community consensus.
- 2) Avoid disturbance of natural hillsides for grading or fuel modification by not enlarging the current development/recreation footprint, especially adjacent to south-facing slopes with Coastal Cactus Wren habitat.
- 3) Encourage construction of a bioregional eco-resort. This includes planting only native trees and shrubs throughout the project, and replacing the current grass-intensive golf course with an Audubon-certified course.
- 4) Maximize the current peaceful and quasi-natural canyon ambiance. Provide an extension of the park experience to Aliso & Wood Canyons Wilderness Park visitors using the Aliso Creek Mountains to the Sea trail.

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5) Examine alternatives that allow Aliso Creek to meander and dissipate velocity and energy. Emphasize natural creek bank stabilization methods. Do not exacerbate flow problems in Aliso Creek by narrowing the flood plain.

6) Encourage proper resource management/stewardship of the project's conservation/open space lands, a significant resource, including restoration of areas invaded by nonnative plants.

Alternatives:

The EIR should evaluate an alternative that moves the golf practice area off an unspoiled ridge and closer to the resort.

Archaeology:

I have received sporadic reports of native American artifacts being unearthed at the back (N end) of the canyon when heavy equipment is working (pipelines, etc). This may indicate previously unknown sites. The artifacts are not collected by any museum or responsible repository and are lost.

We appreciate the opportunity to contribute to the dialogue on this project and look forward to future participation in the planning process. Thank you for considering these comments.

Sincerely,

*Elisabeth Brown*

Elisabeth M. Brown, Ph.D.  
President