

SANTA MONICA MOUNTAINS CONSERVANCY

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January 25, 2010

Rudy Silvas, Principal Regional Planning Assistant
County of Los Angeles Regional Planning Department
Impact Analysis Section
320 West Temple Street, Room 1348
Los Angeles, California 90012

**Quest Ranch NOP Comments
4001 North Topanga Canyon, Woodland Hills
Project No. R200901566**

Dear Mr. Silvas:

The proposed project to construct a 285-bed assisted living facility in a rural area of the Santa Monica Mountains would result in significant impacts to visual and biotic resources. The Draft Environmental Impact Report (DEIR) must fully study these impacts and propose feasible alternatives to the proposed development that preserve the visual and ecological qualities of the subject property. The property is unique, not only in its scenic value, but as one of the few locations where the wildness of the mountains reaches the valley below. Indeed, the subject lot serves as one of the gateways to the Santa Monica Mountains National Recreation Area along a primary access route.

The subject 47.2-acre property represents a northern extension of an approximately 2,000-acre core habitat area between Old Topanga Canyon Road and Topanga Canyon Boulevard (SR 27) that is not bisected by a paved road. The north-slope property is also heavily wooded, contains numerous ecotones, and variable topography including one significant drainage course. As a result the property could harbor any non-aquatic dependent species found in the Santa Monica Mountains other than ring-tailed cats. In addition to resident wildlife, the subject property enables wildlife movement from the above-described core habitat area to outlying habitat blocks.

Currently human disturbance is concentrated in the northeast corner of the property. To provide an adequate level of biological resource protection, the DEIR must include at least two feasible development alternatives that limit development to the northern one third of the site. The proposed use as an assisted living facility need not be the only potential use considered by the DEIR if other options with less impact are feasible.

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The Conservancy requests that one environmentally superior alternative represent the minimum development allowed by-right on the property and that a second environmentally superior alternative be of the same use as the proposed project, but sited in an ecologically superior location. In the attached figure, the Conservancy puts forth the limits of grading for an alternative DEIR project that works with the landforms and major clusters of native oak and walnut trees. The alternative also includes a public trail through the easternmost section of the property where it would not interfere with privacy and preserve public access to parkland further uphill. All alternatives evaluated by the DEIR should include a highly restrictive conservation easements over all remaining natural areas no matter their size.

The subject property is one of a few key private properties, along with one City of Calabasas-owned property, that comprise the high quality viewshed on the portion of SR 27 between the Top of Topanga Overlook and Woodland Hills. The proposed project is a mass-graded project that alters approximately two-thirds of the site including filling a significant drainage. Unfortunately, the proposed project concentrates its impact in the least disturbed and most ecologically valuable portion of the site. After fuel modification, little quality habitat would remain. The proposed project and any closely related project alternative would result in unavoidable significant adverse visual and biotic impacts to a scenic State route in a National Recreation Area.

As proposed, the project neither fits within the character of the surrounding land uses nor follows the zoning established by the General Plan. The Notice of Preparation (NOP) identifies the parcel as “non-urban,” yet the proposed intensity represents an incursion of what can only be characterized as an urban use into a mostly natural area. How is it that this drastic increase in density only requires a conditional use permit rather than a General Plan amendment? Perhaps the project was misnoticed and should be reconsidered through the appropriate process.

Please address any future documents to the attention of Paul Edelman at the letterhead address and questions to him at (310) 589-3200 ext. 128.

Sincerely,

RONALD P. SCHAFER
Chairperson