

SANTA MONICA MOUNTAINS CONSERVANCY

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May 23, 2011

Mr. Geoffrey Starns
Community Development Department
City of Calabasas
100 Civic Center Way
Calabasas, California 91302

Notice of Preparation Comments
4790 Las Virgenes Road (APNs 2069-078-009 and 011)

Dear Mr. Starns:

The Santa Monica Mountains Conservancy (Conservancy) has had a long history with the subject 77-acre property that is integral both to the central core habitat of the Santa Monica Mountains and a regional habitat linkage to the Simi Hills. Parkland owned and managed by the Mountains Recreation and Conservation Authority (MRCA) abuts the subject land on three sides. The ultimate land use on the subject property will have great bearing on a major viewshed located along the 101 Freeway and within both the City and a major northern extension of the Santa Monica Mountains National Recreation Area. A portion of the property proposed for grading is also located within the boundary of Los Angeles County Significant Ecological Area number 12.

It is common knowledge that solving for a large, ancient landslide on the property's north-facing slope is a major development constraint. As it is proposed, the project's remedial earthwork necessary to stabilize the slide would require mass grading and one hundred percent visible, manufactured slope faces over 300 feet high. The cut material from the mountain landslide is proposed to be packed into the back canyon almost to the MRCA property boundary. The proposed project does not work at all with conforming to the site's topographical and geological constraints.

It is safe to say that any project requiring full remediation of the subject large landslide would result in unavoidable, significant adverse impacts to biological and visual resources at a minimum. The Draft Environmental Impact Report (DEIR) must include at least two physically feasible development alternatives that do not require full remediation of the landslide. Only with such alternative projects can decision makers be presented with alternatives which avoid unmitigable significant adverse biological and visual impacts.

Mr. Geoffrey Starns
NOP Comments - 4790 Las Virgenes Road
May 23, 2011
Page 2

Many historic landslides dot the Santa Monica Mountains and the City of Calabasas. To our knowledge, amidst widespread local geological instability, the threat of land movement does not prohibit the use of existing roads, trails, and recreation areas. To our knowledge the subject landslide under current land use conditions does not pose any substantial public safety threat even to users of the historic dirt road that courses through the property at the foot of the landslide to the MRCA parkland. For the DEIR to include an adequate range of alternatives, it must include two physically feasible alternative projects that leave the landslide basically in place and work around its hazards to result in projects that allow for full economic use of the remainder of the property.

The DEIR should include a simplified geological constraints analysis that specifically shows at approximately 200-scale where development is physically feasible without the need to do large-scale remediation of the subject major landslide. If there are cost effective ways to adequately attenuate the slide without the substantial loss of oak trees and coastal sage scrub and gain additional development footprint, the constraints analysis should also show how much additional development area could be gained through such methods.

In all cases, there are many acres of highly disturbed land on the property with full access from Las Virgenes Road that can be intensively developed for a considerable economic return on the property given the site's zoning, access, and proximity to utilities.

The highest quality ecological areas on the property are the north-facing landslide slope and the back canyon narrows that abut MRCA property. We encourage the City to shape the maximum number of project alternatives to include no adverse impacts and permanent protection in these two high resource areas.

The proposed project requests a significant amendment to the City's 2008 adopted General Plan which would result in a net reduction of at least nine acres of permanent open space and a gain of developable area. Without a major offsite acquisition of over 175 acres of nearby compensatory permanent public open space, the Conservancy sees no public policy rational to up zone the property to allow greater significant biological and visual impacts.

The proposed project shows a trail or road leading from a proposed culdesac at the east side of the project to the historic road leading into MRCA parkland. We urge the City to shape every DEIR alternative to include a public trail to this juncture with MRCA parkland to some point along Las Virgenes Road.

Mr. Geoffrey Starns
City of Calabasas - 4790 Las Virgenes Road NOP comments
May 23, 20011
Page 3

In conclusion, as presented in the Initial Study, the Conservancy sees no overriding concerns associated with the proposed project, or any combination of residential and commercial development, that the City could adopt for unmitigable significant adverse visual and ecological impacts on the subject property.

Please address any questions and send all correspondence to Paul Edelman of our staff at the (310) 589-3200 ext. 128 and at the above letterhead address.

Sincerely,

ANTONIO GONZALEZ
Chairperson