



United States Department of the Interior

NATIONAL PARK SERVICE
Santa Monica Mountains National Recreation Area
401 West Hillcrest Drive
Thousand Oaks, California 91360-4207

In reply refer to:
L76/ SAMO 142-16

September 14, 2011

Mr. Rudy Silvas, Zoning Permits West Section
Los Angeles County Department of Regional Planning
320 W. Temple St., Room 1348
Los Angeles, CA 90012
E-mail: "Silvas, Rudy" <rsilvas@planning.lacounty.gov>

Re: Calabasas Peak Motorway Residences, Notice of EIS Preparation

Dear Mr. Silvas:

The National Park Service (NPS) has reviewed the Notice of Preparation of an Environmental Impact Report (EIR) and Initial Studies for four proposed 6,000-square-foot single family residences and associated 277,000-gallon water storage tank along Calabasas Motorway, Project Nos. R2008-00115, R2008-00116, R2008-00257, and R2008-00258. Calabasas is a designated Significant Ridgeline. The four residences would exceed county administrative thresholds for ridgeline development and grading as dictated in the county's Ridgeline and Grading Ordinance. For each of the four residences, the project applicant is requesting a Conditional Use Permit (CUP) to allow grading in excess of 5,000 cubic yards, and a variance for ridgeline development within 50 horizontal feet and 50 vertical feet of the ridgeline, i.e., the ridgeline protection zone.

The project lies within the Santa Monica Mountains National Recreation Area (SMMNRA), a unit of the National Park System. The NPS, as the managing federal agency for SMMNRA, provides advisory comments on the effects of private and public land development in the Santa Monica Mountains at the invitation of state and local units of government with authority to prevent or minimize adverse uses. We assume a neutral position and do not support or oppose land development. We offer the following comments. Overall, the project could not be developed at any level without causing significant negative natural and visual impacts, to the detriment of the native ecosystem and the recreational trail visitor experience. We concur with the county's determination that the project has the potential to cause significant impacts and therefore, is requiring preparation of an EIR. We also concur with the county's list of environmental issues to be analyzed in the EIR as stated in the Notice of Preparation.

EIR Alternatives

The EIR should include an alternative that stays within the Ridgeline and Grading Ordinance thresholds for ridgeline development and grading. We understand it would not be feasible to

construct any residences without a driveway encroachment into the ridgeline protection zone. However, the proposed residences might be scaled back to eliminate the encroachment into the ridgeline protection zone and to reduce grading to less than 5,000 cubic yards per residence.

Aesthetics

We concur with the findings in the Initial Studies for the four residences. Any development along Calabasas Motorway would be detrimental to the scenic setting. Regarding Item 1(b), views from regional riding or hiking trails, the EIS should consider impacts to views from several public trails in addition to views from other public vantage points along Calabasas Motorway. Other trail-related view points may include the Lois Ewen Overlook at the intersection of Stunt, Schueren, and Saddle Peak Roads. The 65-mile Backbone Trail that runs across the Lois Ewen Overlook also hosts views to the north from that area that should be evaluated in the EIR. Other trail-related viewpoints include the terminus of Topanga Ridge Motorway at the former fire lookout structure. Views from this area are particularly impressive, because the geologically and visually interesting horizontal striations of the "bowl" framed by the Calabasas Motorway ridgeline are visible. Views from Red Rock Road in the Red Rock Canyon parkland area may also be impacted by the proposed development.

Biological Resources

Calabasas Motorway is within a minimally developed area with suitable habitat for a diversity of wildlife studied by the NPS, ranging from large carnivores to small reptiles. The EIR impact analysis should assess "edge effect" impacts associated with occupation of the four residences at the edge of surrounding undisturbed native habitat. Edge effects may include lighting, sights, sounds, smells, predation by pets, and use of fertilizers, herbicides, and pesticides, including anticoagulant-based rodenticides.

The unique geologic formation and soils that compose the ridgeline habitat in this area also contribute to the potential for several sensitive species to be present in the project area. The plant and animal species lists in the Initial Studies are comprehensive. The EIS should analyze the project's potential impacts to these species owing to habitat removal, disturbance, and future residential occupation edge effects.

Cultural Resources

The Calabasas Motorway ridgeline and surrounding slopes are rich in paleontological resources. Fossils are visible in rocky outcroppings along the Secret Trail on the westerly slope of the ridgeline. The preparers of the EIS should consult with paleontologists at the Los Angeles Natural History Museum for assistance with potential impacts to these unusual resources. The NPS can assist with identifying experts, if necessary.

Geology and Soils

The Initial Studies identify the area as within an earthquake-induced landslide hazard zone. The EIR should address the potential to exacerbate the landslide risk by landscape irrigation,

septic system percolation, pool failures, and other sources of imported water that may weaken the underlying geological substrate.

Land Use and Planning

The EIS should evaluate the proposed project's compatibility with the park setting of the SMMNRA. The NPS's General Management Plan for SMMNRA (2002) prescribes management areas for the entire recreation area. The management prescriptions are advisory on lands other than federal parklands, but the prescriptions nevertheless provide a vision for protection and preservation of park resources within SMMNRA. The proposed project lies at the interface of areas designated for low or moderate intensity of use. The summary of each management area follows, taken from the GMP, Figure 4: The Plan.

Low Intensity Area: Emphasis would be on natural and cultural resource preservation and a sense of being immersed in a natural and wild landscape away from the comforts and conveniences of "civilization." The sights and sounds of nature in this area would be more prevalent than that of humans. There would be no overnight uses. Hiking, biking, and horseback riding would only be on designated trails.

Moderate Intensity Area: Emphasis would be predominantly on the natural environment, but there would also be a sense of being near the familiarity, comforts, and convenience of "civilization." Facility development would harmonize with the natural setting and be based on the principles of sustainable development as described under the parkwide goals. Hiking, biking, and horseback riding on designated trails, low-impact camping, and self-guided and guided interpretive walks would be acceptable activities. Moderate use areas would act as an insulating buffer around urban development.

Public Services

The EIS should include an assessment of appropriate construction design to minimize the potential structural loss in a wildfire, along with the ability of first responders in a wildland fire to reach the project site in time to provide firefighting assistance. The 1993 Old Topanga Fire started at the water tank site across from the intersection of Old Topanga Canyon Road and Calabasas Motorway. Within ten minutes, the fire had already burned a residence across from the tank and had severely burned one resident and caused the death of another while they were attempting to escape. This all occurred before firefighters from Station #69 in Topanga were able to respond. The proposed residences are less than one-third mile away of the ignition point of the Old Topanga Fire, thus providing an example of the speed at which a fire may move through the proposed project site and the inability of firefighters to arrive in time to defend life and property.

Recreation

The EIS should detail the location of the proposed trail easement across Project No. R2008-00115. It is unclear in the Notice of Preparation where the easement would be located. Furthermore, the EIS should clarify a dedicated trail route across all four project parcels, including a) the existing private property bypass trail that crosses approximately 220 feet over

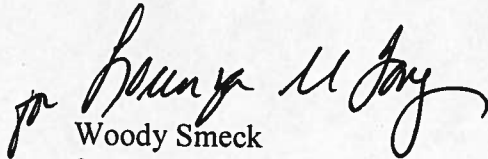
Project No. R2008-00116 from the boundary with the adjacent private property to the east and its connection with Calabasas Motorway, b) along Calabasas Motorway, and c) across Project No. R2008-00115. The EIS should specify trail designs, ranging from shared access on paved Calabasas Motorway to a separated unpaved pathway adjacent to the roadway. The EIS should also specify trail widths and use designation over any portion of a trail off the motorway alignment.

Utilities and Service Systems

The EIR should explore impacts of overhead versus underground power lines.

Thank you for the opportunity to comment. If you have questions, please call Melanie Beck, Outdoor Recreation Planner, at (805) 370-2346.

Sincerely,



Woody Smeck
Superintendent

cc: Joe Edmiston, Executive Director, Santa Monica Mountains Conservancy
Craig Sap, Acting Superintendent, Angeles District, State Department of Parks and Recreation
Clark Stevens, Executive Officer, Resource Conservation District of the Santa Monica Mountains