

OLD SMMC LETTERS

SANTA MONICA MOUNTAINS CONSERVANCY

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Agenda Item 12(c)
SMMC
5/21/12



August 19, 1996

Vince Bertoni, Senior Planner
City of Malibu
23555 Civic Center Way
Malibu, CA 90265-4804

Comments on Draft Environmental Impact Report for the Rancho Malibu Hotel Project

Dear Mr. Bertoni:

The Santa Monica Mountains Conservancy offers the following comments on the proposed 250 room hotel and restaurant in the Malibu Canyon watershed. The Conservancy supports and encourages visitor serving uses in the Santa Monica Mountains National Recreation Area. However, such uses should be designed to retain locally significant natural resources values and viewsheds.

Many of the concerns raised in the Conservancy's response to the Notice of Preparation have been inadequately answered in the Draft Environmental Impact Report. Our principle objective is obtain minor modifications to the eastern edge of the project for three purposes. Those purposes are as follows:

1. To ensure an adequate habitat linkage through the property between the habitat surrounding Pepperdine University and State-owned Malibu Bluffs Park on the coastal side of Pacific Coast Highway (PCH).
2. To maximize both the retention and unit integrity of the contiguous, and clearly identified, block of high quality coastal sage scrub habitat.
3. To reduce viewshed impacts from higher elevations in the Santa Monica Mountains and from PCH.

The three DEIR project alternatives that the document finds to be environmentally superior to the proposed project all call for reductions of the project on this ecologically and visually sensitive eastern flank. Those three alternatives are ; 1) Alternative B: Development with a smaller hotel, 2) Alternative C: Development with a hotel only, and 3) Alternative D: Development at lesser density. It is unclear why has the document not identified a single environmentally superior alternative.

City of Malibu
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Looking at the figures in the DEIR that reveal the ecological constraints of the site, it is clear that the band of high quality coastal sage scrub on its eastern side forms a contiguous habitat linkage. The project design can better integrate this band of habitat and reduce impacts to it. The DEIR analysis of the linkage's value is clearly biased and at best precursory. In regards to periodic species replenishment of the Malibu Bluffs this wildlife corridor is significant.

The DEIR analysis incorrectly describes the qualities of the highly variable and broad "receiver area" on the south side of PCH. It fails to account for the trickle, or near absence, of traffic on all concerned roads at 3:45 am on Tuesday nights in January for example. Some wildlife mortality will surely occur but numerous, ecologically critical successful crossings will also occur.

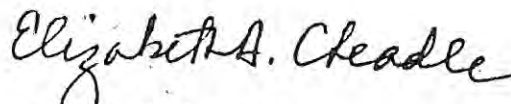
We disagree with the DEIR that the project will not interfere substantially with the movement of resident wildlife species. The key factor, which the DEIR supports, is that many impacts to the eastern wildlife corridor are avoidable by a slight shift of the projects perimeter buildings to the east. The DEIR suggests eliminating some of the most visually prominent villas most visible from Civic Center Way [eastern end].

We request that the Final EIR include an environmentally superior alternative that includes a functional wildlife corridor/coastal sage scrub preserve along the project's eastern flank. Our staff is available to participate in the slight redesign. For example, it is imperative that slope steepness in key area be taken into account.

The Conservancy strongly supports the DEIR mitigation measure that requires the acquisition of offsite coastal sage scrub habitat. The Conservancy will consider acceptance of this mitigation land if it desired by the City.

The DEIR states that the all of the environmentally superior alternatives may be economically infeasible to the applicant. They also may highly feasible, thus the document should not make economic statements in either direction without an adequate, objective economic analysis for support.

Sincerely,



Elizabeth A. Cheadle
Chairperson

SANTA MONICA MOUNTAINS CONSERVANCY

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October 6, 1997

Vince Bertoni, Senior Planner
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**Comments on Revised Draft Environmental Impact Report
for the Rancho Malibu Hotel Project**

Dear Mr. Bertoni:

The Santa Monica Mountains Conservancy would like to iterate the concerns expressed in our comment letter dated August 19, 1996. We appreciate the responses made in this revised Draft Environmental Impact Report but feel that they fail to fully address the issues raised.

While we understand the needs of the project to comply with both the fuel modification ordinances and water balance requirement, we continue to feel that the project, as designed, will have a significant impact on the movements of resident wildlife species. As we stated in our previous comment letter we feel that a slight redesign would preserve more of the undisturbed natural vegetation thereby providing a more viable wildlife corridor while meeting both fire and water requirements.

We continue to support the mitigation measure requiring the donation of offsite coastal sage scrub habitat. The Conservancy will consider acceptance of this mitigation land if desired by the city.

Sincerely,

Elizabeth A. Cheadle

ELIZABETH A. CHADLE
Chairperson