

OLD SMMC LETTERS

SANTA MONICA MOUNTAINS CONSERVANCY

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



June 19, 1995

Mr. Steven A. Nystrom, Senior Planner
City of Malibu
23555 Civic Center Way
Malibu, CA 90265-4804

Rancho Malibu Hotel Notice of Preparation Comments

Dear Mr. Nystrom:

The Santa Monica Mountains Conservancy offers the following comments regarding the contents of the proposed Draft Environmental Impact Report (DEIR) for this extensive hotel facility on a 27.8 acre site located at the intersection of Pacific Coast Highway and Malibu Canyon Road. The Conservancy's principal concerns relate to potential aesthetic, biological, and trail impacts. We request that the DEIR further analyze and address the following specific issues.

Habitat Linkage to Malibu Bluffs: The state-owned Malibu Bluffs parkland immediately south and southwest of the project site, on the opposite side of Pacific Coast Highway (PCH), represents a regionally significant block of highly accessible, intact, coastal habitat. Without question, virtually all mammal, and selected bird populations, will experience an ongoing decline in vigor if this habitat block becomes isolated from the main body of the Santa Monica Mountains. Our analysis differs with the Initial Study findings relative to the dispersal of wildlife. The PCH represents a substantial barrier to wildlife movement, but nonetheless some animals will cross such a barrier.

The subject site for the proposed hotel represents one of two remaining habitat linkages between the main body of the Santa Monica Mountains and Malibu Bluffs. The other connection is via Puerco Canyon to the west, however it appears that contiguous property fences on the coastal side of PCH diminish the quality of this linkage. The DEIR should explore and compare the characteristics of both existing habitat linkages and the potential value of the Puerco Canyon drainage culvert under PCH for wildlife movement.

The proposed hotel property contains a fairly unique assemblage of coastal sage scrub, chaparral, and coastal bluff vegetation elements. The slope along Civic Center Way contains a substantial number of black walnuts. In general, the habitat characteristics and topography of the portion of the property paralleling Civic Center Way represent a good habitat linkage. That portion of the property ties in well with the Pepperdine open space that is located immediately east of the campus' Malibu Canyon Road entrance. The habitat on the opposing side of PCH is not ideal, but the area is free of existing, or future, human use, buildings, and infrastructure.

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The site plan depicted in the NOP exhibits provides a narrow corridor along this described route through the property. However, with several narrow choke points as shown, combined with the need for fuel modification zones along the length of the corridor, the adequacy of its viability would be questionable for many species.

The DEIR should include a detailed, small-scale graphic showing the exact nature of the proposed final vegetation type and density in this habitat linkage. The Conservancy also strongly requests that the DEIR include an official DEIR project alternative which includes an uninterrupted habitat linkage along the west side of Civic Center Way that in no place is less than 100-horizontal-feet-wide with the exception of one or two points to accommodate the shown community center parking at the intersection of Malibu Canyon Road. In such case, the northeastern portion of the parking lot layout, vegetation, and lighting should maximize conditions for nocturnal wildlife movement.

Trail Issues: The NOP states that a dedicated public nature trail traverses the site. The DEIR should clearly show the alignment of the trail and describe the rationale for the route. It also should address what possible trail connections exist off of the subject property and consider mitigation measures to provide, or enhance, those connections.

The DEIR should also address routing the trail through the wildlife corridor proposed in this letter. However, this analysis should include both the positive and negative ecological aspects of combined use. The corridor may need to be wider in places, a change which would also make the natural trail more aesthetically pleasing.

Aesthetics and Viewshed Issues: The native vegetation of the site contributes significantly to the viewshed along Malibu Canyon Road across from Pepperdine University. With the exception of the last stretch before PCH, this viewshed contains an impressive stand of coastal sage scrub vegetation. Retention of this roadside vegetation, intact, would be of great public benefit. The DEIR should explore its retention in various project designs.

The DEIR should include a visual analysis of the proposed project, and each of its DEIR alternatives, from at least two points in Malibu Creek State Park, from the Piuma Road overlook, and from at least two points on the Conservancy's recently acquired 186-acre Dempster/Bovenzi property off of Piuma Road.

If you need further information relative to these comments, please contact Paul Edelman on the Conservancy staff at (310) 456-7807 ext. 121.

Sincerely,

Original Signed By

Edward J. Begley, Jr.
Chairperson