

SANTA MONICA MOUNTAINS CONSERVANCY

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January 26, 2014

Maureen Tamuri
Community Development Director
City of Calabasas
100 Civic Center Way
Calabasas, California 91302

**Broadway Trust Residence - 3121 Old Topanga Canyon Road
File No. 130000405**

Dear Ms. Tamuri:

The Santa Monica Mountains Conservancy (Conservancy) offers the following comments on the proposed ridgeline house adjacent to Conservancy-owned open space in the Dry Creek Canyon watershed. We appreciate both the City staff and the applicant's representative reaching out to our staff on the potential implications of this proposal. The Conservancy's objective for this location is to maximize the quality of the trail user experience, keep development off the designated significant ridgeline, and reduce required permanent brush clearance impacts on State parkland. Our staff examined the site and concluded that the ridgeline house location was unavoidably antithetical to these three objectives. Before a CEQA review document is issued on the subject proposal, the following information should be added to the City's mix.

The attached figure shows an alternative location where a house could be constructed in the center of the property (not on the ridgeline). The house would use the same access driveway and share (as with the current proposal) a new fire department turnaround with the lot to the immediate east. This house location meets all of the Conservancy's objectives and reduces many environmental impacts and many construction costs.

Any development on the ridgeline would force the designated City trail into a zone squeezed between existing Calabasas Highlands homes and a new home that would have the quality views as opposed to the future public trail right-of-way possessing them. Likewise, any development on the ridgeline would require a minimum of 1.5 acres of permanent fuel modification visible from every compass direction and enveloping both sides of the proposed inferior trail location including on offsite public and private lands. Any development on the ridgeline would create permanent light sources on one of a few designated prominent scenic ridgelines in the General Plan. Any development on the ridgeline would also require retaining several hundred feet of over-steep, offsite concrete

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3121 Old Topanga Canyon Road
January 27, 2014

driveway directly where the future (already well-used) public trail is to be located. Any development on the ridgeline would bring Argentine ant populations closer to prime Coast horned lizard habitat on adjacent public open space.

In short, any development on the ridgeline would result in unavoidable significant adverse visual, land use (General Plan modification of trail location and significant ridgeline) and ecological impacts. The argument that the top of the ridge was already cut off and that there is an existing driveway to the site does not outweigh the much more severe permanent impacts to whole sections of two sub-watersheds, a designated trail alignment, and Conservancy parkland.

The fact that the driveway for the subject 3121 Old Topanga Road house makes use of two other parcels for a viable development proposal, begs for a CEQA review document that includes at least these two other parcels that contain the driveway leading to the subject lot. The cumulative impacts of development on those three lots would be substantially greater than the single proposed house at the end of the line. We presume that a waterline would have to be extended a considerable distance from Old Topanga Canyon Road. This water line would have to serve the other three lots. The development of the total of four lots are all linked by the common driveway and we suspect by the need for a common water main and other utilities.

The Conservancy staff's brief site visit revealed that the subject 3121 Old Topanga Road lot contained a viable building location that would avoid probably all potentially significant impacts. That event alone shows that to fulfill the public interest the City has to look at alternative development scenarios. Unless the City takes every action permissible to ensure that no house is applied for or approved on the subject ridgeline parcel (3121 Old Topanga Road), the Conservancy's position is that the facts make it clear that an Environmental Impact Report must be prepared. In 2012 the City made that finding in writing to an apparent prior owner.

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

Sincerely,

IRMA MUÑOZ
Chairperson