

SANTA MONICA MOUNTAINS CONSERVANCY

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July 28, 2014

Ms. Talyn Mirzakhanian
Planning Division
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 Ms. Mirzakhanian:

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, within the City, and within 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.

The proposed project would compress 138 detached single family homes, eight condominiums, a four-story hotel, an extensive street network, and 571 parking spaces into the subject area. The now mostly undeveloped east side of Las Virgenes Road adjacent to core Santa Monica Mountains habitat would be transformed into major development area with scores of acres of impermeable surface and thousands of lighting elements. Scores of acres would require permanent irrigation.

Grading for the 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 Initial Study discloses the amount of required grading volume as 2,273,000 cubic yards. Much of the cut material from the mountain landslide is proposed to be packed into the back canyon and sub-canyons almost to the MRCA property boundary. In addition 338,000 cubic yards (a bare minimum of

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33,800 dump truck loads) would need to be exported through the City. Does 33,800 truck trips with unregulated diesel exhaust constitute an unavoidable significant adverse air quality impact? The proposed project categorically fails to work with the site's topographical and geological constraints. The proposed project fails to avoid impacts as dictated by the California Environmental Quality Act.

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. The applicant took a well know risk acquiring the site or an option to develop the property that extending the grading footprint to the large landslide would trigger significant environmental impacts and discretionary approval. The City is under no obligation to approve a General Plan Amendment or approve a project with unavoidable significant adverse impacts.

Many historic landslides dot the Santa Monica Mountains and the City of Calabasas. To our knowledge, amidst widespread local geological instability, the generalized threat of land movement does not prohibit the use of existing roads, trails, and recreation areas in other parts of the City. 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 of such additional development area could be gained through such methods.

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Within the subject property, there are many acres of substantially disturbed land with full access to Las Virgenes Road that can be intensively developed for a considerable economic return given the site's zoning 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. The narrows of that back canyon support a locally rare alkali seep including yerba mansa (*Anemopsis californica*). We encourage the City to shape the majority of project alternatives to include both no adverse impacts and permanent protection in these two important 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 equal development area. The Conservancy sees no public policy rational to also up zone (Zone Change) 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 an unbroken public trail from this juncture with MRCA parkland to some point along Las Virgenes Road.

In conclusion, the Conservancy sees no overriding benefits associated with the proposed project, or any combination of residential and commercial development in a similar footprint, that the City could identify to adopt a statement of overriding considerations. Let the land dictate the use.

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,

LINDA PARKS
Chairperson