

**SANTA MONICA MOUNTAINS CONSERVANCY**

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February 23, 2015

Ms. Talyn Mirzakhanian  
Planning Division  
Community Development Department  
City of Calabasas  
100 Civic Center Way  
Calabasas, California 91302

**Notice of Preparation Comments - Canyon Oaks Project  
4790 Las Virgenes Road (APNs 2069-078-009 and 011)  
SCH No. 2015021008**

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. All of the property is located within the boundary of the Los Angeles County General Plan-designated Santa Monica Mountains Significant Ecological Area.

The proposed project has the exact disturbance and development footprints as the project the Conservancy commented on in July of 2014. The number of units has been reduced but the impacts of the massive manufactured remedial slopes and the loss of habitat have not been reduced. The project still proposes a four-story hotel right above Las Virgenes Road, 419 parking spaces in a watershed with Federally-endangered steel head trout, a 20-acre v-ditch covered slope, and a minimum of 2,191,092 cubic yards of grading. That is almost 30,000 cubic yards of grading per proposed residence. The proposed project is an attempt to force a flat land suitable project into mountainous terrain that is in a gateway to the Santa Monica Mountains National Recreation Area.

The now mostly undeveloped east side of Las Virgenes Road adjacent to core Santa Monica Mountains habitat would be transformed into a major development area with

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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 minimum grading volume as 2,191,092 cubic yards. The proposed project categorically fails to work with the site's topographical and geological constraints. The amount of emissions from moving and compacting this much earth must be addressed.

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 proposed project fails to attempt to avoid obvious significant impacts as dictated by the California Environmental Quality Act.

The Draft Environmental Impact Report (DEIR) must include at least two physically and economically 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 knowingly took many financial risks acquiring the site. Such non-full-landslide remediation DEIR alternatives cannot be excluded from impact analysis because the applicant paid more for the property than such projects can support. Clearly the proposed four-story hotel can be built without full landslide remediation. The City is under no obligation to approve a General Plan Amendment, a Zone Change, or 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 (Anza Calabash Canyon Loop Trail) 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 and economically 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.

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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.

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. Because approximately 20 acres of the existing proposal would consist of v-ditch covered slopes, the DEIR must analyze how much groundwater recharge potential would be permanently lost compared to the natural slope or a slope with no v-ditches.

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