

SANTA MONICA MOUNTAINS CONSERVANCY

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November 2, 2015

Michael Klein, Planner
Community Development Department
City of Calabasas
100 Civic Center Way
Calabasas, California 91302

**Viewpoint School Tennis Courts and Parking Lots Project
Mitigated Negative Declaration Comments**

Dear Mr. Klein:

The Santa Monica Mountains Conservancy provides the following comments on the proposed Viewpoint School expansion project along the Dry Creek Canyon stream and adjacent hillsides. To date the school has not permanently protected any habitat in the Santa Monica Mountains, and it continues to expand. A considerable length of a blueline stream now disappears into the campus with marginal habitat utility.

The Conservancy asserts that the proposed project would result in significant biological impacts without additional mitigation and minor project modifications.

The proposed project would jacket over 1,000 feet of willow-lined blueline stream with fencing, lighting utilities, and impervious surfaces. It would also disrupt the creek's hydrological and ecological balance with the addition of over half a dozen direct storm drain inlets with no defined or detailed provision for energy dissipation or permanent riparian habitat clearance at the drain outlets. The proposed project would create multiple acres of impervious surface of which 93 new parking spaces would drain directly into the creek. The proposed project would leave 1,000 feet of blueline stream with zero upland habitat buffer beyond the edge of the existing and future willow canopy edge.

The proposed biological mitigation measures do nothing to offset the permanent degradation of 1,000 feet of blueline stream habitat and severing of wildlife movement across Mulholland Highway.

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The project description is inadequate because it does not distinctly show or define where the proposed security fence would go along the 1,000-plus feet of the blue-line stream. For either side of the creek it would go on, it would 100 percent cut off wildlife access from that side of the creek. The MND analysis is deficient for not addressing how the project would significantly degrade habitat connectivity across Mulholland Highway. The subject project area provides the only Mulholland Highway wildlife crossing (habitat on both sides of road) between Old Topanga Canyon Road and just west of Canyon Drive. The couple hundred acres of contiguous high quality habitat north of Mulholland Highway are in danger of being isolated. The proposed project contributes significantly to that isolation. The Mountains Restoration Trust has photographs of an un-collared young mountain lion on its property this month within that above-described approximately 200-hundred acre habitat block.

For a project that requires a General Plan Amendment, a Scenic Corridor permit, and a Zone Change within the Santa Monica Mountains National Recreation Area, the Conservancy expects mitigation commensurate with the significant biological impacts.

To not result in unavoidable significant adverse biological impacts, the proposed project must include an adequate permanent wildlife corridor across Mulholland Highway. Such a corridor must be at least 15-20 feet wide and be free of all lighting and fencing of all types. The permanency of the corridor must be from a third party conservation easement or a deed restriction that requires a unanimous City Council vote to revoke. The attached figure shows where such a wildlife corridor could go. For all intents and purposes the project needs to lose the most downstream proposed tennis court to have a functional wildlife corridor.

To mitigate both of the direct loss and degradation of habitat from all of the project components, the school must permanently protect all of the remaining open space along the proposed tennis court area and south of the Brown and Castle Oaks sites. The attached figure shows the minimum conservation easement boundary to achieve adequate habitat protection and future buffering of offsite habitat. That permanent protection must be via a third party conservation easement or a deed restriction that requires a unanimous City Council vote to revoke. Ideally the Mountains Recreation and Conservation Authority

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would hold the conservation easements. The proposed protected areas do not diminish the project except to potentially eliminate one tennis court.

In the spirit of ecological sustainability in the Santa Monica Mountains, we hope the school concurs with and accepts these suggested mitigation measures as depicted and described in this letter and attached figure as part of the MND. Unless the school plans for additional expansion into the proposed conservation easement areas, we see no reason for resistance. If such expansion is planned, it should have been included in the subject MND. The MND should include an analysis of how the project fits into the school's planning documents and if the proposed Conservancy conservation easement areas show ecologically incongruous uses in the school's planning documents.

Please direct any questions and future documentation to Paul Edelman of our staff at 310-589-3200 ext. 128 or at the above letterhead address.

Sincerely,

LINDA PARKS
Chairperson