

**SANTA MONICA MOUNTAINS CONSERVANCY**

RAMIREZ CANYON PARK  
5750 RAMIREZ CANYON ROAD  
MALIBU, CALIFORNIA 90265  
PHONE (310) 589-3200  
FAX (310) 589-3207  
WWW.SMMC.CA.GOV



April 25, 2016

Doug Hooper, Planning Director  
Planning Department  
City of Agoura Hills  
30001 Ladyface Court  
Agoura Hills, California 91301

**Mitigated Negative Declaration Comments  
Ladyface Mountain Senior Apartments Project**

Dear Mr. Hooper:

The Santa Monica Mountains Conservancy offers the following comments on the above referenced project proposed at the base of Ladyface Mountain. A project that would remove 56 oak trees and encroach on an additional 25 oak trees within a 7.1-acre parcel does not represent a project that works with a site's biological constraints. The outright loss of 56 oak trees on a parcel that is well integrated with the core habitat of the Santa Monica Mountains is an avoidable significant adverse biological impact. At a minimum the project should be modified to reduce the loss of oak trees by 50 percent. Without such a reduction the significant ecological impact would require preparation of a focused environmental impact report to look at less damaging alternatives.

As proposed, the project would essentially directly impact all of the unbuilt open space via the required 200-foot-wide brush clearance zone. The Mitigated Negative Declaration (MND) is deficient for not addressing this wholesale required brush clearance of the property. The Mountains Recreation and Conservation Authority owns protected open space that abuts the southeast corner of the subject property.

The proposed section of Agoura Road is more scenic than any other section in all of the individual cities and the unincorporated areas. It allows unparalleled deep views into the base of Ladyface Mountain. The proposed multi-story structures are jammed up to the right-of-way of Agoura Road and would result in significant adverse impacts to public viewsheds. It is our understanding that the Specific Plan requires substantially greater setbacks from Agoura Road.

Doug Hooper  
Ladyface Mountain Senior Apartments Project MND Comments  
April 25, 2016  
Page 2

The worst visual impacts come from proposed Building B which would be a large, tall building bounded by well over a 100 acres of open space. Secondly the height of proposed Building A would block views of the whole complex of Ladyface Mountain open space to the southeast.

All of these identified impacts can be significantly reduced or be avoided by contracting the two proposed development footprints both horizontally and vertically. We urge the City to reject the project and the MND until significant reductions in visual and biological impacts are achieved.

Whatever project is approved should have an irrevocable deed restriction placed over all remaining open space to assure both its permanent protection and proper management.

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

Sincerely,

Irma Muñoz  
Chairperson