

**SANTA MONICA MOUNTAINS CONSERVANCY**

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Planning Commission  
Community Development Department  
City of Calabasas  
100 Civic Center Way  
Calabasas, California 91302

**24101 Dry Canyon Cold Creek Road  
Mulholland Highway Scenic Corridor**

Dear Chairperson Washburn and Commissioners

The Santa Monica Mountains Conservancy (Conservancy) provides the following comments on the subject project with 12,723-square-feet of structures in heart of the Mulholland Highway Scenic Corridor zoning district. The exist building pad is located in a highly visible, slightly elevated location by the watershed divide between the Cold Creek and Los Angeles River watersheds. The pad has natural vegetation on three (north, east, south) sides and no houses in those three directions for a minimum of 600 feet. Development on the site should minimize the building height and maximize the distance of buildings from habitat to reduce the permanent annual fuel modification footprint.

The project as proposed fails both to minimize building height and to pull structures away from native vegetation to achieve a smaller permanent brush clearance scar. The substantial central portion of the building in excess of 20 feet in height and the proposed detached garage with an Accessory Dwelling Unit at the east edge of the pad contribute to this failure. The adverse visual impacts from these two project elements could result in significant visual impacts in the Scenic Corridor and the Santa Monica Mountains National Recreation Area. The residential compound may also be visible from the New Millennium and Secret trails. To address these potential unavoidable significant visual impacts, the City must conduct an California Environmental Quality Act (CEQA) impact analysis. The project description does not include the permanent fuel modification or the direct loss of approximately two acres intact coastal sage scrub and scrub oak woodland.

A focused Environmental Impact Report (EIR) is required if the detached garage with an Accessory Dwelling Unit is not removed from the plan and likewise if the maximum

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building height is not reduced to 18 to 20 feet. Only with the analysis of less damaging alternative projects can decision makers be presented with projects that avoid or reduce the adverse impacts of these two project elements.

The project also requires a significant amount of grading. The proposed cut is 4,438 cubic yards, the fill 2,031 cubic yards, and 2,407 cubic yards of export. A good portion of that grading results in a large manufactured (cut) slope above the proposed driveway. That slope is shown in the submitted plans as having many rows of v-ditches and down drains. That manufactured slope would be equally as visible as the house itself. The existing pad has an existing cut driveway. However, the proposed project would cut a new, longer driveway that is more visible from users of Mulholland Highway. That new driveway cut drives the requirement of the large manufactured slope. The majority of the large manufactured slope north of the proposed driveway would eliminate intact coastal sage scrub vegetation that is part of an approximately 220-acre contiguous habitat block.

Another potential adverse visual impact is from lighting. The longer driveway and detached garage with an Accessory Dwelling Unit create substantially broader and more impacting lighting impacts. In all project scenarios, strict and enforceable restrictions on lighting location, intensity, and direction must be imposed.

A visual impact study is required to address permanent brush clearance impacts, lighting impacts, manufactured slopes, and house height visibility from both public roadways and trails.

According to the City's Project Planner, a prior lot split approval that created a separate building pad on the south side of Dry Canyon Cold Creek Road had a condition for a conservation easement over approximately the northern half of the property. The conservation easement was never recorded but the lot split did occur. That restrictive easement as approved should be recorded prior to the further processing of the current application.

It is imperative that any project on the property include a much larger conservation easement that includes all portions of the project not included in the approved grading or irrigated landscape footprint. The habitat on the property has strong potential for the

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presence of the sensitive coast horned lizard. As a part of an approximately 220-acre contiguous habitat block that remains well connected to a large multi-thousand acre core habitat of the Santa Monica Mountains, the property could support many sensitive reptile and bird species along with the full suite of local mammals. The property forms a key connection point to the larger referenced core habitat areas located south of Mulholland Highway. This larger scale habitat connectivity affirms the need for permanent wide habitat connectivity on the subject parcel right to the Dry Creek Cold Canyon Road right-of-way. If there is an impediment to a second current conservation easement, then a permanent deed restriction requiring a majority City Counsel vote to overturn must be required mitigation. Recordation should be required prior to the issuance of any permits. No uses should be allowed in the restricted areas except fuel modification required in writing by the fire department.

The environmental analysis must address if the story poles currently on the property represent the structure height after the proposed 4,438 cubic yards are cut.

Please direct all questions, documentation, and correspondence to Paul Edelman, Deputy Director at the above letterhead address.

Sincerely,

CRAIG SAP  
Chairperson