

SANTA MONICA MOUNTAINS CONSERVANCY

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December 21, 2020

Marie Pavlovic
Los Angeles County
Department of Regional Planning
320 West Temple Street
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Notice of Preparation Comments

**West Hills Crest Residential Project No. 98123, Conditional Use Permit No. 98123,
Oak Tree Permit No. 98123, Vesting Tentative Tract Map No. 52652**

Dear Ms. Pavlovic:

The Santa Monica Mountains Conservancy (Conservancy) offers the following comments on the above referenced 25 lot vesting tentative tract map that abuts the Conservancy's Upper Las Virgenes Canyon Open Space Preserve and the City of Los Angeles' Knapp Ranch Park and El Escorpián/Bell Canyon Park. The 58-acre property is part of the core habitat of the Simi Hills ecosystem. The Initial Study leaves open what vested rights the project has to date given the 2008 appeal of the Regional Planning Commission approval to the Board of Supervisors and then the Board requiring an Environmental Impact Report. In any case, the applicant continues to push for a project with massive land form alteration and a million cubic yards of grading. That equates to 40,000 cubic yards of grading per house. Los Angeles County can do better than that to balance housing with land form and habitat preservation.

There are two prominent topographical view features on the site that must be preserved to the maximum extent possible. The first is an east-west trending ridgeline along the southern property boundary. The second is a wooded north-facing slope that is part of the entry viewshed of the trail into El Escorpián Canyon from the end of Vanowen. The proposed project eliminates both features and makes no attempt to work with the terrain to preserve these viewsheds for public purposes. The Conservancy disagrees with the Initial Study conclusion that the proposed project would not result in unavoidable significant adverse visual impacts.

The Draft Environmental Impact Report (DEIR) must include at least one viable alternative that protects the two above landscape features to provide decision makers with adequate

perspective on how a less damaging project can be configured. Housing is a primary issue of the day. High quality single family homes can be constructed on stair-stepped sloped pads. In particular it makes sense to construct such homes along existing paved Randiwood Lane where lots 10-14 and lot 25 are located. That cut face appears to be stable bedrock that could accommodate such development. Big flat backyards in hillside areas are not by right. These lots would have big sloped backyards.

The extension of Kittridge Street greater than 250 feet in length requires the removal of the above described prominent ridgeline. Any project that includes such an extension would result in an unavoidable significant adverse visual impact. Such a short extension of Kittridge, with a northern turn as shown on the project layout, makes sense as a cul-de-sac or a secondary access for homes constructed in the large topographic bowl where lots 1, 9 and 23 are now shown. An emergency access could be gated and not built to public road standards to reduce grading and land form alteration.

The placement of recreational development including multiple tennis courts and parking on the flattened peak of the prominent ridge line directly next to Conservancy open space would have both a negative visual and ecological impact on that public parkland. The entirety of the project site and all of the adjacent public open space is mountain lion habitat. The local mountain lion population is a candidate threatened species under California Endangered Species Act. Lighting and human activity deter mountain lion presence. If a narrow access road needs to be constructed to a new water tank, per the existing project layout that can be achieved without destroying the ridge line.

The proposed project entrance from Randiwood Lane makes sense. That street could lead to a cluster development in the large topographic bowl where lots 1, 9 and 23 are now shown. A cul-de-sac there could accommodate at least ten homes sites with pads greater in size than those in the immediately adjacent neighborhood and lots four to five times greater in size. Again an emergency access land could be constructed to join this housing cluster with a housing cluster on a short spur extension of Kittridge Street as described above. This overall alternative provides for six houses on Randiwood Lane, ten houses in the large topographic bowl on a new street connected to Randiwood Lane, and four houses on a spur extension of Kittridge Street. That is sum of twenty houses. The grading would be less than 25 percent of the one million cubic yards proposed and there would be no adverse public viewshed impacts. The key to this alternative is to move away from large flat pads in hillside areas. It is key that the project not be designed to require the complete over excavation of the wooded north-facing slope that is part of the entry viewshed of the trail into El Escorpián Canyon from the end of Vanowen. Such over excavation and the

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establishment of a key for the fill of the large topographic basin must be located back from that slope so that it can remain in its current state with many native trees.

The last element of the Conservancy's suggested alternative is for any required detention or retention basins to soft bottom and perhaps oversized to actually create habitat. That basin should not be located at the base of the wooded north-facing slope that is part of the entry viewshed of the trail into El Escorpion Canyon from the end of Vanowen Street. All drainage from the improvements should be directed to Randiwood Lane and Kittridge Street.

The subject exposed rock type supports a population of the State-listed San Fernando Valley spineflower. It is imperative that rare plant surveys look for this plant in April and May.

Please direct any questions or correspondence to Paul Edelman, Deputy Director of Natural Resources and Planning, at King Gillette Ranch, 26800 Mulholland Highway, Calabasas, California 91302.

Sincerely,

IRMA R. MUÑOZ
Chairperson