

SANTA MONICA MOUNTAINS CONSERVANCY

RAMIREZ CANYON PARK
5750 RAMIREZ CANYON ROAD
MALIBU, CALIFORNIA 90265
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March 23, 2009

Glenn Michitsch, Senior Planner
City of Calabasas Planning Division
100 Civic Center Way
Calabasas, California 91316-4446

Calabasas Highland Estates NOP Comments

Dear Mr. Michitsch:

The subject property constitutes a substantial visual resource area along scenic Mulholland Highway and contains high quality habitat that is well linked to the core central habitat block of the Santa Monica Mountains. We concur with the Initial Study findings that the proposed project could result in over two dozen potentially significant environmental impacts.

The proposed project spreads 14 home sites to every corner of the 14.5-acre property and requires the removal of at least 30 oaks prior to any potential remedial grading. As the project is designed, every square-inch of the 14.5 acres will be in a fuel modification zone or will be graded. Lots 6, 7 and 8 would require offsite brush clearance on the parcel to the east. The net result is that the project will eliminate 14.5 acres of habitat in the Santa Monica Mountains National Recreation Area and degrade an additional offsite acre because of fuel modification. The project also uses mass grading to create flat pads on rolling terrain.

The Draft Environmental Impact Report (DEIR) alternatives analysis must include at least two less damaging project footprints. The area most suitable for development is the area occupied by proposed lot numbers 1,2,4,8-12.

The DEIR should include an alternative limited to these above eight lots. This footprint avoids virtually all oak trees except those necessary to connect a street to Mulholland Highway. It appresses developed next to existing homes on the south and eliminates the need for offsite fuel modification requirements. It may also reduce the need for a secondary access road to the south. It does retain an eight acre block of contiguous habitat that remains well connected to the core habitat of the Santa Monica Mountains and maintains most of the viewshed integrity of scenic Mulholland Highway.

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A second DEIR alternative should add lot 6 to the eight-lot alternative addressed in the paragraph above. If the applicant says more units are necessary, those units should be shoe-horned into this maximum ecologically sustainable footprint by using pie shaped lots.

Both alternatives should include a conservation easement (not just a deed restriction) on all ungraded portions of each lot or common lot. If a conservation easement does not work well with the City, the land should be offered for dedication in fee simple to the Mountains Recreation and Conservation Authority as a condition of map recordation. In any case the conservation easement holder or fee simple open space holder should be provided with a monitoring or maintenance payment or endowment to assure that the land continues to provide mitigation for the project's permanent adverse impacts. Any meaningful property monitoring requires at least a monthly visit/inspection constituting at least two hours of staff time.

Any alternative that puts houses in the oak woodlands beneath lots 3 and 5 could not be justified by a statement of overriding considerations under any circumstances. In addition we see no justification to place houses within the oak resources of lots 13 and 14.

Please send the DEIR to, address any questions to, Paul Edelman of our staff at the above address and by phone at (310) 589-3200 ext. 128.

Sincerely,

RONALD P. SCHAFER
Chairperson