

SANTA MONICA MOUNTAINS CONSERVANCY

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September 25, 2017

Glenn Michitsch
Planning Division
Community Development Department
City of Calabasas
100 Civic Center Way
Calabasas, California 91302

**Notice of Preparation Comments - West Village Project
4790 Las Virgenes Road**

Dear Mr. Michitsch:

The Santa Monica Mountains Conservancy (Conservancy) has had a long history with the subject 77-acre property that is integral both to the central core habitat of the Santa Monica Mountains and a regional habitat linkage to the Simi Hills. Parkland owned and managed by the Mountains Recreation and Conservation Authority (MRCA) for over 25 years abuts the subject land on three sides. The ultimate land use on the subject property will have great bearing on a major viewshed located along the 101 Freeway, within the City, and within a major northern extension of the Santa Monica Mountains National Recreation Area.

The proposed project is an attempt to force too many residential units into mountainous terrain at a gateway to the Santa Monica Mountains National Recreation Area in the 101 Freeway Scenic Corridor. The project exemplifies this incongruous fit between project and landscape with the need to grade over 2.6 million cubic yards of earth and to cover a valley bottom with approximately fifty feet of fill dirt off the adjoining mountainside.

The Conservancy hopes that the City sees the light that a project with this magnitude of earth alteration, with this regional public visibility, and virgin vegetation community alteration cannot escape from causing unmitigable significant adverse biological, green house gas emission, and visual impacts. Twenty-acres of cement drain-laced manufactured slope reaching over 40 stories in height up a mountainside to the edge of public open space does not mitigate the loss of the mountainside. How can that kind of monolith slope be characterized as natural open space? That mountain side currently supports the best example of north-slope coastal sage scrub - coast live oak habitat in the entire City. How can the City consider a grading project of this magnitude and inevitable permanent scar?

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Consider that the project would produce 180 dwelling units in 15 three story complexes on 9.5 acres. The Canyon Oaks Environmental Impact Report for the same property concludes that 7.5 acres of the site is usable without remediating ancient landslide. At the same ratio of units to acres for the project, the 7.5 acre area could yield 140 of the type of units in the proposed project. The major project cost (grading) and all impacts would be reduced exponentially. No parties seem to want the token 6,000-square-foot retail center. This win-win alternative project must be analyzed.

The City is not required to approve a project with multiple unavoidable significant impacts even if the minimum level of permitted residential units cannot be accommodated. If the City disagrees with that statement, the factual and legal basis of such disagreement must be included in the Draft Environmental Impact Report (DEIR). The City has options. The Conservancy urges the City to require complete DEIR analyses of multiple alternatives that do not require full remediation of the ancient onsite landslide or avoid it altogether.

The DEIR must fully analyze at least three physically and economically feasible development alternatives that do not require full remediation of the landslide. Only with such alternative projects can decision makers be presented with alternatives which avoid unmitigable significant adverse biological, green house gas emission, and visual impacts. At least two such alternatives should be for one hundred percent residential development even if they require a General Plan Amendment and/or Zone Change.

The applicant knowingly took many financial risks acquiring the site with multiple landslide testing and analysis documents on record. Such non-full-landslide remediation DEIR alternatives cannot be excluded from complete impact analyses because the applicant claims they are economically infeasible with zero detailed supporting evidence. The applicant would still have full economic use of the remainder of the property which includes approximately seven acres of pre-disturbed flat land with superior physical access. The Canyon Oaks project DEIR makes the case that a 7.5-acre area is physically and safely available for building without having to touch or repair the landslide. How many of the proposed three story townhouse complexes could fit on 7.5 acres? Wise cities do not have to financially bail out developers that paid too much for a property with a known large landslide that has thwarted multiple developers for decades.

Many ancient landslides dot both the Santa Monica Mountains and the City of Calabasas. To our knowledge, amidst widespread local geological instability, the generalized threat of

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land movement does not prohibit the use of existing public roads, trails, and recreation areas in other parts of the City. To our knowledge, the subject landslide under current land use conditions does not pose any substantial public safety threat to users of the historic dirt road (Anza Calabash Canyon Loop Trail) that courses through the property at the foot of the landslide to the MRCA parkland. Hence, the portion of the property that directly abuts the landslide can be used for a public trail system (included in the proposed project description) without a reduction of available building area.

The DEIR should include a fully supported, simplified geological constraints analysis that specifically shows at approximately 200-scale where development is physically feasible without the need to do large-scale remediation of the subject major landslide or any such remediation. This analysis must consider the robust use of various debris deflection and retention structures, if warranted.

The highest quality ecological areas on the property are the north-facing landslide slope and the back canyon narrows that abut MRCA property. The narrows of that back canyon support a locally rare alkali seep including yerba mansa (*Anemopsis californica*). We encourage the City to shape all project alternatives to include both no adverse impacts and permanent protection for this back canyon seep area.

Please address any questions and send all correspondence to Paul Edelman of our staff at the (310) 589-3200 ext. 128 and at the above letterhead address.

Sincerely,

IRMA MUNOZ
Chairperson