

SANTA MONICA MOUNTAINS CONSERVANCY

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March 22, 2004

Dustin Woomer
City of Calabasas
26135 Mureau Road
Calabasas, California 91302

**Entrada - Las Virgenes DEIR Comments
Project No. 03-03**

Dear Mr. Woomer:

The proposed Entrada development project along Las Virgenes Canyon Road is located within the Santa Monica Mountains Conservancy Zone. The Draft Environmental Impact Report (DEIR) fails to adequately describe the visual and ecological importance of the proposed project site. As a result, the proposed project would create unnecessary visual and biological impacts to the Conservancy Zone. The City should require the highest standard of impact avoidance and modify the project accordingly.

The project site is located adjacent to a core area of the Santa Monica Mountains National Recreation Area (SMMNRA) and a key inter-mountain range wildlife movement corridor between the Santa Monica Mountains and the Simi Hills. The site is also fully integrated with a large habitat block that is contiguous with Malibu Creek State Park. The proposed project site supports 1.96 acres of the "very threatened," according to the California Department of Fish and Game, valley needlegrass grassland plant community. In addition, the proposed project site is a significant component of the Las Virgenes corridor viewshed and is adjacent to Conservancy parkland.

The project currently under construction immediately to the north of the proposed project site is a prime example of unwarranted mass grading in the SMMNRA boundary. The extensive terracing needed to develop the project shows that the project is incompatible with the natural landform. The proposed project must not replicate this type of landform modification.

The topographic constraints of the subject project site would require mass grading to develop the proposed 40 single-family homes. The proposed project does not adhere to the lessons learned from the project to the north. The direct biological impacts to the valley needlegrass grassland, indirect biological impacts from the intrusion into a core block of habitat, and viewshed impacts all warrant a reduced project footprint, such as DEIR Alternative 2. The

proposed project will cause significant unavoidable impacts to this critical population of valley needlegrass grassland. The mass grading will impact the viewshed of Las Virgenes View Park and the Bark Park Trail, Las Virgenes Canyon Road, and the 101 Freeway. Also, two prominent high knolls are located in the southwestern portion of the proposed project site. The proposed project will in essence remove both of those knolls.

The project site is zoned for Commercial Limited activity. A small-scale commercial development on the project site would create fewer impacts than the proposed development of 40 single-family homes. If the City prefers single-family detached residential development on the site, the footprint must work within the terrain. An environmentally sensitive office building is better than an environmentally insensitive housing tract.

The DEIR states that Alternative 2 (Multi-Family Residential Development) would have a diminished project footprint. The DEIR states that this alternative “should be considered a feasible alternative that could potentially reduce environmental impacts” and achieves the “overall project objective.” If the overall project objective is achieved with Alternative 2, then why would it be in the City’s best interest to choose the project that has more impacts?

The City should require the highest standard of impact avoidance. To achieve this standard, the project must have a reduced footprint similar to that outlined for Alternative 2. Alternative 2 would reduce the impacts to valley needlegrass grassland by 60-70 percent. Alternative 2 is also consistent with current zoning for the project site. If the footprint was the same as that in Alternative 2, a proportionate number of single-family detached residential units could be fit into that area. A smaller footprint is also critical to create a buffer inbetween the development nodes to the north and south of the proposed project site.

Open Space Dedication with Maintenance Funding

The undeveloped land on the proposed project site must be dedicated in fee to a public entity. The Mountains Recreation and Conservation Authority (MRCA) is an appropriate agency to accept and to manage the open space lot. The ecological sensitivity of the site and the density of development warrant a requirement of permanent open space maintenance funding. A Community Facilities District must be established to provide funding for management and maintenance of the open space. Such a district can be inexpensive to form, if it is formed for the sole purpose of open space maintenance and does not require any bonding for improvements. Either the City or the MRCA (whichever entity manages the open space) could be the beneficiary of the funding source. The funding will ensure that the open space will remain a productive part of the ecosystem. The district should be set-up so that it will generate a minimum of \$7,500 per year net to the public entity in perpetuity. This amount will ensure ranger services, habitat maintenance, and resource protection in perpetuity.

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The Conservancy appreciates the opportunity to comment. Please direct any questions or future documents to Susan Shanks of our staff at (310) 589-3200 ext. 124 and at the above Ramirez Canyon Park address.

Sincerely,

JEROME C. DANIEL
Chairperson