

SANTA MONICA MOUNTAINS CONSERVANCY

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March 22, 2004

Christina Tran
Los Angeles County Department of Regional Planning
320 West Temple Street
Los Angeles, California 90012

**Woolsey Canyon Mitigated Negative Declaration Comments
Project No. 03-370**

Dear Ms. Tran:

The proposed Woolsey Canyon development project in the Simi Hills is located within the Rim of the Valley Trail Corridor portion of the Santa Monica Mountains Conservancy (Conservancy) jurisdiction. The Santa Monica Mountains Conservancy (Conservancy) is concerned about the proposed project adequately protecting the biological and scenic resources on the project site. The only guaranteed method of protecting these resources is to require an open space dedication over all undeveloped portions of the property.

However in addition, maximum avoidance measures must be taken to protect the known occurrences of Santa Susana tarplant along the western edges of Parcels 2, 3, and 4. The entire property is prime habitat for Santa Susana tarplant.

Furthermore, the property is located in a visually unique area with numerous rocky outcrops. Visually, the property is part of the entrance to the adjacent Sage Ranch park. To minimize visual impacts, the developed areas must fit in with the surrounding landscape and topography. Grading must be kept to a minimum. Without a dedication of open space and conservation easements, the project could result in significant visual and biological impacts.

To further minimize the visual impacts, the building pad for Parcel 4 should be moved down to the southeastern corner of Parcel 2. Development should not occur on Parcel 4. The parcel boundaries do not have to be designed as one contiguous block as they are currently. The building pads could be clustered in the southernmost portion of the project site along Woolsey Canyon Road. To still achieve five acre parcels, the parcels could have long extensions to the north of the building pads. These extensions would be contiguous with the Remainder Parcel and must be dedicated as open space.

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Open Space Dedication

The Initial Study does not explain what the intended uses are for the Remainder Parcel, which totals over 36 acres. This parcel must be dedicated in fee to be preserved as open space. The Mountains Recreation and Conservation Authority is an appropriate agency to accept and to manage the open space lot. Dedication of the Remainder Parcel would increase the size of the habitat block of Sage Ranch.

The potential significant impacts of the project without permanent open space dedications otherwise warrant an Environmental Impact Report. Based on conversations with the applicant, there are no plans to dedicate the Remainder Parcel. Any planned future development of the Remainder Parcel must be disclosed in the current CEQA documents, otherwise development of the entire project site will be piece-mealed. Future piece-mealed development of the Remainder Parcel would violate CEQA.

In addition to the fee dedication of the Remainder Parcel, conservation easements are critical over significant portions of parcels 1, 2, 3, and 4. Those easements should cover all portions of each parcel that is not located within a developed area or fuel modification zone. The portion of Parcel 1 that lies south of Woolsey Canyon Road must be dedicated in fee as open space. The conservation easement must prohibit equestrian facilities, fencing, non-native vegetation, agriculture, clearance, grading, and structures on those portions of the parcels.

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