

SANTA MONICA MOUNTAINS CONSERVANCY

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Michael Klein
City of Calabasas
100 Civic Center Way
Calabasas, California 91302

Rondell Oasis Hotel Project
Mitigated Negative Declaration Comments
SCH No. 2015111019

Dear Mr. Klein:

The proposed hotel project is located within the boundary of the Santa Monica Mountains National Recreation Area (SMMNRA) adjacent to approximately 700 contiguous acres of open space owned by the Mountains Recreation and Conservation Authority (MRCA). The proposed project is located along the Ventura Freeway Scenic Corridor and in the Las Virgenes Gateway Plan area. The subject property forms the western entrance to perhaps the only natural section of the De Anza National Historic Trail in the SMMNRA. The project relies heavily on the conversion of 0.87 acres of public right-of-way to purely private uses. The project eliminates a component of the Las Virgenes Gateway Plan to create a public trail connection between the Las Virgenes Road - Agoura Road intersection and the adjacent De Anza trailhead. It also eliminates a future park and ride lot called for in City planning documents. Finally it requires a General Plan amendment for increased building height.

Given these constraints, the proposed project should exemplify fitting into the landscape/viewshed and maximizing public access. Unfortunately the project footprint, design, and public recreational amenities fall short of this exemplification. The shortcomings are substantial enough that as proposed the project would have unavoidable significant adverse impacts on public recreational and viewshed resources. The project footprint must be more compact in order to not dominate the landscape and not choke off the De Anza Trailhead.

Unless the project is redesigned to address most of the issues in this letter, the appropriate level of environmental review is an Environmental Impact Report that includes alternative projects to avoid and reduce adverse environmental impacts.

The project converts an area completely free of structures and lighting to an uninterrupted 700-foot-long lighted parking lot with a 300-foot-wide, 50-foot-tall building up against a dramatic mountainside. The proposed architecture in no way blends with the terrain. To the applicant's credit he has sought the use of darker earth tone exterior colors to dampen the building's mass. To this agency's dismay, the City's architectural review committee has steadfastly insisted on a stark white color. Currently at night the entire site is pitch black as a baseline condition.

To avoid significant, adverse visual and recreational impacts, an alternative must be analyzed that reduces the northern extension of the parking area. A reduction of a minimum of 20 parking spaces (as shown) is necessary to eliminate the visual sprawl of the project. Such a reduction in northerly parking spaces would also allow for a non-paved trail from the boundary of MRCA property (De Anza Trail) around the northern parking lot boundary and then along the western boundary of the Rondell Street public right-of-way to Las Virgenes Road. The MTA bus stop is at that location.

To guarantee no loss of public access to the trail, it is critical for any project approval to include the granting of a trail easement to a public agency. That trail easement must extend unbroken from the Las Virgenes Road right-of-way to the MRCA property. The trail easement must be at a finished grade that includes no steps. It should work for horses, mountain bikes, and strollers. The public must not completely lose its existing right to traverse the Rondell Street right-of-way. A complete loss of public access from the vacation could be a significant adverse land use impact. At a minimum a 10-foot-wide trail easement granted to a public agency is necessary to preserve this right. It makes sense to grant that trail easement to the MRCA because it would lead to MRCA property. This arrangement also allows the public agency to post a sign visible from Las Virgenes Road showing the trail origin, irrespective of any and all future uses of the hotel site. It is important for a trailhead to be recognizable and publically inviting.

A great amenity for the applicant to add is to plant evergreen coast live oak trees at 20-foot intervals along the non-Caltrans adjacent side of the 10 foot trail easement to create future shade and to screen the development project from the roadway. The parking lot landscape irrigation would also water the pathway trees.

It is also imperative that the project be conditioned to include an easement to a public agency for the proposed trailhead parking spaces. To insure permanent public access to those parking spaces, the provision of an access easement to the public agency would also be necessary. The applicant best knows the needs and constraints of the site and should

determine the location of such parking space and access easements. The provision of these functional public easements outweighs the need for perfect aesthetics and amenities. The northern extent of a revised project in Rondell Street right-of-way might be a good location for said public parking. The proposed public trail and parking in the Rondell Street public right-of-way could actually be vacated in fee simple to a public agency such as the MRCA. Under all circumstance, no aspects of the project must decrease the potential for the trail to receive various levels of historic designation eligibility. One horse trailer location might be considered for this parking composition.

The MND does not address the proposed project's affect on access to the adjacent, undeveloped 22.5-acre parcel (APN 2069-020-001). If that parcel could be acquired and permanently protected by the applicant, it would greatly reduce the potential cumulative impacts of the proposed project. It would also allow for habitat restoration and tree planting in the area of the 101 freeway - Las Virgenes Road interchange.

As proposed, the project offers virtually no enhancement or creation of natural habitat. Project alternatives should include such habitat creation and enhancement on all open space areas and ideally the voluntary offering of small conservation easements. The species list include willow (*Salix* sp.) which is a wetland plant. Perhaps there is a small location onsite to create or enhance a small wetland habitat area.

Sincerely,

LINDA PARKS
Chairperson