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January 28, 2019

Glen Michitsch
Community Development Department
City of Calabasas
100 Civic Center Way
Calabasas, California 91302

**West Village at Calabasas Project
Draft Environmental Impact Report Comments**

Dear Mr. Michitsch:

The Santa Monica Mountains Conservancy (Conservancy) offers the following comments on the above referenced Draft Environmental Impact Report (DEIR). The Conservancy's hope is that the City would continue to work to find balance between subject property's environmental constraints and the applicant's rights to construct a project. However, the limited selection of alternatives in the DEIR shows a failure to seek that balance on behalf of both the Santa Monica Mountains National Recreation Area and the citizens of Calabasas. Only a re-circulation of the DEIR with specific alternatives addressed below can remedy this deficiency.

Among those DEIR alternatives in the current document, it is hoped the City would lean towards the footprint in the document's Environmentally Superior Alternative because the only Project Objective it does not meet is the provision of a tiny pocket park and the remediation of the landslide. Why move 2.5 million cubic yards of earth to fix a landslide-- that according to the DEIR-- does not need to be fixed to safely accommodate seven acres of development? One certainly would not move that much earth to salvage a tiny pocket park.

The conclusions of the DEIR are clear that any major multi-story project on the site would result in unavoidable significant adverse aesthetic impacts related to changing the visual character of the site. However, the DEIR fails to address in a meaningful manner how a project could be designed to eliminate (reduce) the majority of visual elements that contribute to such unmitigable impacts. Alternative projects 2 and 3 make minor omissions of a single building here and there and move stories between buildings to shift impact locations. The DEIR states that Alternative 4 would have pad levels along Las Virgenes Road that are approximately 30 feet taller than those of the proposed project. The DEIR

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fails to include information on why such pad levels would be at higher elevations particularly in light of the fact that the two proposed entrance roads have the equivalent grades and locations as those of the proposed project and the other DEIR alternatives. Alternative 4 was designed to be rejected not to be viable and feasible for consideration by decision makers.

The Conservancy's 2017 Notice of Preparation Comments expressed a clear need for multiple alternative projects that did not require remediation of the major landslide. The DEIR includes just one such alternative that is obviously designed for rejection by decisionmakers. That one alternative (Alternative 4 - Modified Landslide Mitigation with Reduced Footprint) is designed to require the export of just under 400,000 cubic yards of dirt.

The DEIR provides no explanation of why any export of earth is required to construct a viable project that does not require remediation of the major landslide. In contrast, the proposed project and all other alternatives are designed to fill the valley with up to 55 feet of earth harvested from the 2,403,418 cubic yards of landslide cut material. They all have no major export of earth. The DEIR shall remain deficient until it adequately describes why a "no landslide removal project" cannot be designed without export of hundreds of thousands of cubic yards of earth. Quite clearly the public and City Council right off the bat would not accept a project with almost 49,000 truck trips of export-thus Alternative 4 truly is not feasible for that reason alone. If a modified version of Alternative 4 that does not require the export of more than 500 dump trucks of dirt must result in less than seven acres of pad area - so be it - that is what the land dictates. Most likely if more stepped pads are used, that seven acre area would not diminish appreciatively.

The DEIR concludes that Alternative 4 would provide a seven-acre pad area for development. To gain just four more acres of pad area with the proposed 11-acre project (and Alternatives 2 and 3), over two million cubic yards of earth need to be cut and re-compacted also requiring grading 28 acres of addition natural area. The greenhouse gas emissions from cutting, stockpiling, and recompacting 2,404,418 cubic yards of earth swamp all of the City's green building emission savings for almost a decade, perhaps two.

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The 28 acres of manufactured slope would have highly compacted soil and a Hoover Dam-scale network of concrete v-ditches and troughs. Plant growth on compacted soils is arrested. Water infiltration on compacted slopes with v-ditch networks is greatly reduced. Furthermore, the 28 acres of manufactured slope will require over a decade of watering, weeding, irrigation repair, and v-ditch clean out. Habitat mitigation on such manufactured slopes is not real habitat mitigation. To reduce DEIR-stated greenhouse gas, aesthetic, and biological impacts, the City must select a less damaging alternative that does not require landslide remediation.

However, the DEIR's range of alternatives is deficient because it does not include a non-landslide remediation project that is not dependent on an a prohibitive amount of soil export. The DEIR will remain deficient until it includes a non-landslide remediation alternative that requires less than 500 truck trips of soil export. The DEIR should examine if that amount of export could go directly to the Calabasas Landfill which would greatly reduce emissions and cost. The Conservancy believes truck trips are the prohibiting factor more than actual cubic yards moved. The one time impacts of five hundred brief dump truck trips to Calabasas landfill are worth maintaining the 28 acres of purple sage scrub above the development.

The range of DEIR alternatives is further deficient because the only non-landslide remediation alternative resorts to the use of a housing type that the City staff and developer know that neighbors will reject because it is a type of lesser value than both theirs and that of the proposed project and alternatives 2 and 3. The DEIR shall remain deficient until a non-landslide remediation alternative includes the same housing type and design as the proposed project or a more valuable per unit type.

The DEIR makes repeated value judgements that the aesthetic impacts of the project and Alternative 4 are similar and the that biological impacts of the proposed project and Alternative 4 are similar. For one, such a statement overlooks that the proposed project would have a 28-acre manufactured slope laced with v-ditches as the City's gateway to the National Recreation Area. Secondly, such a statement overlooks that the habitat loss of the proposed project is 28 acres greater. Plus of those 28 acres, thirteen of them are sensitive purple sage scrub with scattered coast live oaks. Although burned in 2018, that

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slope will reveal new fire following plant species not accounted for in the DEIR to date. The proposed project would result in unavoidable significant adverse biological impacts.

The DEIR also falsely insinuates that the project would include the restoration of 66.09 acres of habitat. Many of those 66 acres are too steep to even walk on or are bare bedrock. The proposed mitigation measures to recreate purple sage scrub habitat on irrigated, compacted manufactured slope with a v-ditch network cannot be supported. There is no case of even one-acre of any type of coastal sage scrub habitat being restored on bare-top soil free- soil in the Santa Monica Mountains or in the Simi Hills. The claim to be able to accomplish such a feat for many more acres over the course of just five years has no basis in fact or example.

The Conservancy urges the City to recirculate the DEIR with at least one non-landslide remediation alternative that does not require more than 500 truck trips of soil export. Ideally that alternative would include the exact housing and building type of the proposed project for the purpose of comparison or a housing type of greater per unit value than the proposed project.

There are good reasons why each version of the projects on this property become more compact over time. The land's constraints demand nothing less. The City's voters amplified that concern with the 2016 referendum rejecting the last project by the same developer.

Please provide any responses, questions, or future documents to Paul Edelman, Deputy Director Natural Resources and Planning, at (310) 589-3200 ext. 128, edelman@smmc.ca.gov, or at the above letterhead address.

Sincerely,

CRAIG SAP
Chairperson