


CITY OF

AGOURA HILLS

"Gateway to the Santa Monica Mountains National Recreation Area"

January 19, 2006

Christina Tran
County of Los Angeles
Department of Regional Planning
Impact Analysis Section, Room 1348
320 West Temple Street
Los Angeles, CA 90012

SUBJECT: COUNTY PROJECT NO. 97-178; CUP NO. 97-178, OTP NO. 97-178, TTM 52419, SCH NO. 1998111091; TRIANGLE RANCH PROJECT DEIR REVISED PROJECT DESIGN SUMMARY

Dear Ms. Tran:

Thank you for the opportunity to review and provide comments on the Revised Project Design Summary associated with the Draft Environmental Impact Report (DEIR) for the Triangle Ranch Project. We understand that the proposed project on the 320.3-acre site has been reduced from a total of 81 single-family residential lots to 71 single-family residential lots, with a corresponding reduction in the amount of grading, size of cut slopes, and height of retaining walls. In some cases, lot sizes have been reduced. We also understand that the development area has been further removed from the known area of *Lyon's pentachaeta*. It appears that the reduction in number of lots has been achieved by shifting the ten lots that were originally in the residential enclave east of Cornell Road to along the western side of Kanan Road. The site layout in the area east of Cornell Road has been reconfigured and concentrated, as opposed to reaching into the small valley. The lot layout in the other enclave west of Kanan Road has been changed slightly, and is more compact, although the number of lots remains the same, while the enclave east of Kanan Road seems to be the same as originally proposed.

Although there have been some notable changes to the project description, most of the comments and questions we identified in our letter dated May 11, 2005 on the Draft EIR (attached) are still relevant, and we request that they be given consideration. We have three additional comments relating to the DEIR and the recently changed site plan, which are listed below. Also, we are requesting that certain items be considered as project mitigation measures.

Section I. PROJECT DESCRIPTION

1. We understand that the tallest cut slope has now been reduced to a maximum of 52.5 feet, while the tallest fill slope is now 40 feet. These reductions are clearly improvements over the original design (70 feet and 65 feet, respectively). However, they still appear inconsistent with the North Area Plan (NAP) Policy IV-12, as noted on page III.K-16 of the DEIR. This should be discussed in the DEIR.

Section III.F. BIOLOGICAL RESOURCES

2. The DEIR notes that SEATAC reviewed prior project iterations on several occasions. The project analyzed in the DEIR, as noted throughout this section of the DEIR, has only partially, but not fully, addressed the SEATAC's concerns. Has this latest version (reduced number of houses) been reviewed by SEATAC and if so, what has been the response? The DEIR should describe this.
3. We are pleased to see the development footprint pulled back further from the largest area of the *Lyon's pentachaeta*, however it seems that there would still be impacts to smaller areas of this species, including the currently proposed plan further encroaching into this species at the northwest corner. This change should be discussed in the DEIR. Also, impacts would continue to occur to the *Santa Monica Mountains Dudleya*.

Requested Mitigation Measures

In addition to the above comments, we respectfully request that the following items discussed in more detail in our letter of May 11, 2005 be made project conditions of approval.

- a. If the required fuel modification zones cross over the northern portion of the site, into the jurisdiction of the City of Agoura Hills, then coordination with the City will be required. The City would not be in favor of any fuel modification that crosses onto City limits, as these areas were donated to the Santa Monica Mountains Conservancy for purposes of permanent open space preservation and habitat protection. For similar reasons, no grading for project construction should occur on land in the City limits. (Please note that grading in the City limits would require a CUP from the City). We request that these requirements be made conditions of approval.
- b. We request that a project condition of approval be made that addresses DEIR mitigation measure F-1(2), as well as including a requirement for a monitoring and maintenance program to ensure that the revegetation is successful; a requirement that the monitoring and maintenance program be specified in the CC&Rs as being the responsibility of the Homeowners' Association or other

future owner of the land; and a requirement that these items be written into the deed.

- c. One of the benefits of the proposed redesign is that there are now several smaller enclaves of residences, as opposed to fewer larger scale ones, which would seem more compatible with the semi-rural environment. However, the character of the project is still more suburban subdivision than semi-rural. We request that as conditions of approval building setbacks from Kanan and Cornell Roads be increased and the setbacks vegetated with denser landscaping (including trees and shrubs) that provide an adequate visual buffer from the homes to Kanan and Cornell Roads, and reflect a more natural, as opposed to a manicured, appearance. As shown in the photo-simulations in the DEIR, the proposed vegetation seems sporadically placed and insufficient. The landscaping should significantly obscure the buildings from vehicles and passersby on the main roadways through the area.
- d. We appreciate that Lots 77, 78, 79 and 81 are proposed for landscape lots in the most recent site plan. We strongly suggest that a similar landscape lot be provided further north along the west side of Kanan Road, in the residential area closest to the City. At a minimum, we recommend that an easement be provided along the lots bordering Kanan Road in this area, with landscaping to be installed and maintained by the HOA. In this area and the various other landscape lots in the project, it may help to create a naturalistic (not manufactured looking) earthen berm with landscaping (native, naturalistic) to truly create a visual buffer from passersby on the roads to these new homes. Please consider adding these mitigation measures as conditions of approval.
- e. A community with street lights, sidewalks, curb and gutter does not seem to be the appropriate type of development in this area, which is semi-rural and surrounded by valuable natural areas and mountains, much of which has been designated as SEA. To be more compatible with the surrounding natural environment, consideration should be given to eliminating curb/sidewalk or used rolled curbs; no street lights or at least no light poles, the use of flag lots instead of cul-de-sac layouts; and more split level pads. Please consider requiring these mitigation measures as conditions of approval.
- f. Similarly, to ensure that the development sufficiently blends in with the surrounding natural environment, particular design characteristics, color schemes and building materials should be stipulated. Mitigations could include requiring earth-tone palettes; utilizing non-reflective and more naturalistic building materials; architecture that reflects but does not detract from the natural semi-rural surroundings through size, height, scale and style; and landscaping design that is naturalistic in placement and in types of species selected to blend in with the existing landscape.
- g. DEIR mitigation measure I-4 on page III.1-35 notes that concrete drains and all other drainage devices shall be tinted with an earth tone. This would help in

minimizing aesthetic impacts. However, rather than just conceal the concrete and other man-made structures through tints, consideration should be given to minimizing the amount and size of man-made drainage structures to what is absolutely necessary. For example, where possible, natural or natural-appearing materials, such as riprap, should be utilized. We request consideration of this mitigation as a condition of approval.

- h. As proposed, the project would appear to significantly add to the existing Kanan Road lighting and create new lighting along Cornell Road. We request that the project be conditioned to avoid street lights, or at least allow only low-level lighting, such as bollards. If this is not feasible, then we request that a photometric study or similar lighting evaluation be prepared that demonstrates the specific areas that would be illuminated and at what levels. This should ideally be part of the DEIR. At the least, however, we request that this requirement to conduct a photometric study or other similar evaluation, and incorporation of methods to minimize any identified adverse impacts, be made a mitigation measure.
- i. Please see Comment #39 in the attached letter dated May 11, 2005. The City requests that an equitable portion of the Quimby fee for the project be provided to the City, or that the project dedicate additional funds, separate from the Quimby fee, to the City as compensation for the greater demand for parks and recreation that would need to be met by Agoura Hills. We request consideration of these mitigations as project conditions of approval.

We would also like to reiterate, from our previous letter, that the project would need to participate in the Traffic Impact Fee (TIF) program on a per PM-trip basis through the City of Agoura Hills Arterial System Development. This required contribution should be clearly discussed in the Environmental Impact Report.

Thank you again for the opportunity to comment on the Revised Project Design Summary associated with the DEIR for the Triangle Ranch Project. The City of Agoura Hills looks forward to reviewing the responses to our comments. If you have any questions, please contact Allison Cook, Senior Planner, of my staff at (818) 597-7310.

Sincerely,



Mike Kamino
Planning and Community Development Director

Attachment: Letter to County from City, dated May 11, 2005

Cc: Susan Tae – County of Los Angeles