

August 31, 2008

Members of the City Council
Members of the Planning Commission
City of Calabasas
100 Civic Center Way
Calabasas, CA 91302

RE: City of Calabasas 2030 General Plan
Draft Environmental Impact Report

The Community Association of Saratoga Hills and the Saratoga Ranch Owners Association (Saratoga Hills and Ranch) are pleased to have the opportunity to comment on the Draft EIR for the City of Calabasas 2030 General Plan. We supported the City decision to form and conduct the GPAC process and applaud the commitment and effort of the GPAC volunteer members.

Saratoga Hills and Ranch support most of the proposals in the Plan, however, we object to the Plan's recommendations to fulfill the Regional Housing Needs Assessment (RHNA). There are superior alternatives to the Proposed Plan with significantly less environmental impacts and more community support. Also, there is a need to include additional information on the impacts on housing and traffic of the Proposed Plan which will provide additional support to change the Plan's RHNA recommendations for low and very low income housing. (It should be noted that we continue to question the need for including the RHNA designations in the General Plan. There are cities that have chosen to self certify and not include those numbers. It is suggested that there may be potential risks associated with that decision and we are assuming that there will be a complete discussion of this subject at the City Council hearings.)

It is disappointing to see the comments that there are no City-wide issues that must be addressed in the Plan. If there were low to very low income units placed on the east side of the City it can be assured that it would be a major City-wide issue. Education could have been a City-wide issue; however, east side schools will eventually meet State guidelines whereas West side schools will continue to not meet State guidelines because of the proposed west side housing increases. All traffic impacts from the high-density projects will be felt on the west side of the City. The comments do not appear to be needed and we suggest that they be removed.

Plan Discussion:

Again, the central issue for Saratoga Hills and Ranch is the Project's recommendation on RHNA low and very low income housing. Following is our position on the Proposed and Alternative Projects in the Draft EIR:

Las Virgenes 1 (7.5 acres on Las Virgenes Road, west of Agoura Road): The Plan proposes 30 homes on this site. We support this proposal. Given the intensity of the multi-family and condominium housing adjacent to this property, a single family development will promote housing diversity and support the Plan's theme of "Community Character" and "Quality of Life".

Las Virgenes 2 (77 acres adjacent to Las Virgenes and Agoura Roads): Saratoga Hills and Ranch support the Planned Density designation and, at a minimum, the proposed 160 low and very low income units at this site. Existing traffic signals and adjacent transportation and support services makes this an acceptable site for the proposed housing. In our view, the PD designation provides the flexibility for a larger housing component and should be considered.

Driving Range (8.66 acres on Calabasas Road west of Mureau Road): Saratoga Hills and Ranch and the Westside Coalition have supported this site for a RHNA designation. It reduces some of the west side school pressure and creates some city geographic balance in support of high-density development. The site is also close to transportation and other services. The suggestion is for a Planned Development (PD) designation similar to Las Virgenes 2. RHNA can be met with 63 units above those allocated for Las Virgenes 2. The PD can be set at 63 low and very low income units and then other commercial designations as appropriate for the site. There is geology and oak tree issues as in most City of Calabasas sloped sites. These issues can be resolved in ways that past hillside property owners have already accomplished. The EIR suggests 120 units for the site although only 63 are needed to accomplish RHNA objectives. Also, a mixed use project may have greater flexibility in meeting the challenges of the site.

Rancho Pet Kennel (6.6 acres): This is an unacceptable site for the proposed high-density development. It should not be a surprise the first two attempts to include the Rancho Pet Kennel property in the Plan were rejected by GPAC. On the third try, in an unagendized vote of 8-6 on the 19 person committee, GPAC voted to include it in the Plan. The Rancho Pet Kennel site fails miserably to support the Plan's themes of ***Environmental Responsibility, Community Character and Quality of Life***. Saratoga, as current residents know it, will be destroyed forever if this project is built.

Safety

A major flaw with the EIR is that it does not address the fact that resident safety would be significantly jeopardized if the Rancho Pet Kennel site was used. Saratoga has one outlet that immediately goes to a freeway bridge. Any traffic incident creates virtual gridlock as drivers exit the freeway and enter our community. Our morning school commute creates significant traffic delays, which would be significantly increased with 132 new unit owners.

The City of Calabasas does not have standards on the number of homes that should be served by one outlet. Whether it does or not is immaterial. The County of Los Angeles does recognize the safety problems associated with any community that has a single access road. Los Angeles County Code Section 21.24.020 mandates for single access that 150 units is allowed and that a maximum of 300 would only be allowed if there were a plan to improve access. The Plan proposes to add 132 units to the existing 270 in Saratoga for a total of 402 units.

The rationale for Section 21.24.020 is that during emergencies, if you have more than 300 units, residents could not be able to get out. The Code was developed by the same County Fire and Sheriff Departments that serve our City. The City obviously recognizes that safety is a priority

so we can only assume that the safety issue was not considered. The only way to address the safety issue is to reject the Rancho Pet Kennel site.

If the Rancho Pet Kennel site was used resident safety would be at risk as it would be unsafe to exit our community in earthquakes, fires and other emergency situations. It now can take 45 minutes to exit our community with freeway accidents and that time will increase in a fire or earthquake that required evacuations. Our community suffered significant damage from the Northridge earthquake and has been surrounded by numerous fires. The fire on August 26, 2008 was a recent reminder on the safety issues associated with an emergency. Panicked drivers disobeyed traffic laws, made illegal U-turns, parked in illegal and unsafe places, and drove above the speed limit with emergency lights flashing. It will be virtually impossible for our residents to obtain medical or other assistance in a timely manner as a result these emergencies.

It is unclear how the Plan's theme of **Quality of Life** is achieved by creating zoning that is 102 units or 34% above the County Code for a single access development. If this zoning is approved and constructed without significant access improvements Saratoga will no longer be a safe place to live.

Traffic

The traffic impacts associated with the Rancho Pet Kennel proposal are significant and negative. The City of Calabasas traffic Level of Service (LOS) standard for freeway intersections is LOS D. The EIR reports LOS D for northbound traffic on Lost Hills Road at the 101 Freeway. That finding is in conflict with the EIR for *The Summit at Calabasas Project* at Lost Hills Road and the 101 Freeway. This is an approved project ready to begin construction and completed within one year. The *Summit EIR* indicates in Table 4.5-5 that the Lost Hills/101 Freeway traffic will be LOS 0.94E when *The Summit at Calabasas* is completed. There is no reason to leave approved projects out of the General Plan EIR. The City must look at all approved projects and ensure that the General Plan is accurate. The *Summit EIR* further states on Page 131 that the Lost Hills Bridge must be widened to achieve a traffic Level of Service that meets City of Calabasas standards. The Lost Hills B&T District will never have more than 50% of required funding for the bridge improvements. There is always hope for grant funding, but until "the check is in the mail" the City should not be up-zoning property that will further exacerbate a traffic condition that does not meet City standards and puts the residents of the impacted community at grave risk.

Air Quality

The EIR clearly articulates the significant air quality issues for projects within 500 feet of a freeway and suggests that symptoms increase even further for projects within 300 feet. The Rancho Pet Kennel borders the freeway fence. Cited health studies report reduced lung function in children, increased asthma hospitalization, and increased asthma and bronchitis symptoms. The EIR reports on CO hotspots. Lost Hills Road and the Ventura Freeway show the highest projected one hour CO concentrations. The General Plan does not include policies to address health risks associated with the placement of residential developments near freeways, so the Plan states that the impacts are **significant but mitigable** without explaining how they are mitigable and at what cost. Do you require children to play indoors? We are unaware of

any feasible mitigation that would protect children at the Rancho Pet Kennel site. Low and very low income individuals often have little or no health insurance. Given the stated health risks – how are these residents going to get the additional medical care needed for the anticipated air quality health issues?

Noise

Noise is another serious health issue for the site. The EIR indicates that 70 dBA is considered “**Normally Unacceptable**” for new construction and development should generally be discouraged”. The EIR, in TABLE 4.9-2 indicated that the current maximum measured noise level on Canwood Street, adjacent to the freeway and ending at the Pet Kennel, is 73.4 dBA. There are two additional noise tables that report on future noise levels, but unfortunately Canwood Street data is not provided. It is our belief that Canwood Street noise levels will increase even further in the **Normally Unacceptable** category. The EIR states that the impacts can be mitigated. We believe that houses can be constructed to mitigate noise but it is unclear how children can be protected outside of the home.

Why destroy a community in the quest to achieve a RHNA number? Saratoga is a quiet single family community that has existed for over 40 years. The Plan up-zone increases our density by 50% at an unacceptable location. There are significant environmental impacts for new and existing residents that include safety, traffic, air quality and noise. And, some of these impacts have not been addressed in the EIR. It is reasonable to conclude that if GPAC had all of the above information and considered it then the 8-6 vote for the Rancho Pet Kennel zoning would have been different.

One of the great benefits of the EIR process is the required development of alternatives to the Proposed Plan. Saratoga Hills and Ranch has reviewed those alternatives and believes that there are superior alternatives to the Proposed Plan that will respond to Plan themes, reduce environmental impact, improve services for RHNA-zoned property, and provide greater support from the community.

Recommendations:

Following are the Saratoga Hills and Ranch recommended changes to the proposed General Plan:

1. Change the Rancho Pet Kennel zoning to single family.
2. Rescind the plan to change City of Calabasas multi-family zoning from 1/16 per acre to 1/20 per acre because the increase will not be needed with the proposed recommendations.
3. Retain the Plan recommendation for Las Virgenes 1 to be single family.
4. Retain the Las Virgenes 2 Planned Development designation with 160 low to very income units and commercial.

5. Achieve the total required 223 low to very low income RHNA units by adding 63 units in one of the two following ways:

a. The preferred approach is to create a Planned Development (PD) for the Driving Range site and assign 63 low to very low income units and commercial allocations as appropriate.

b. If the Driving Range site cannot accommodate all of the 63 units, it is recommended the low to very low income unit designation for Las Virgenes 2 be increased to achieve the total 223 units needed and adjust the commercial allocations as appropriate.

Our associations appreciate the efforts to present comprehensive alternatives with complete environmental reviews. The information provided an excellent opportunity to evaluate and make clear choices for our view of the City of Calabasas up to 2030. Saratoga Hills and Ranch respectfully requests that the Planning Commission and the City Council support our recommendations in the General Plan. We believe that the recommendations will improve the Plan's response to the stated themes of *environmental responsibility, community character, and quality of life*.

Respectfully submitted,

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