

**From:** Samantha Greenberg <[sgreenberg@ucdavis.edu](mailto:sgreenberg@ucdavis.edu)>  
**Sent:** Thursday, February 4, 2021 4:46 PM  
**To:** info <[info@cityofcalabasas.com](mailto:info@cityofcalabasas.com)>  
**Subject:** AGAINST zoning 12, 13, and especially 14

to info

Dear City Commission,

I'm writing against Up Zoning 12, 13, and 14 as this would be terrible for the rural community. This is upzoning vacant land. DO NOT increase density #12, #13, and #14 primarily.

Fire and evacuation are already an issue on Mulholland Highway.

**Why** are you wanting to put housing where there is no transportation, or easy walking distance to Valley Circle shopping, the Commons, schools, etc. ?

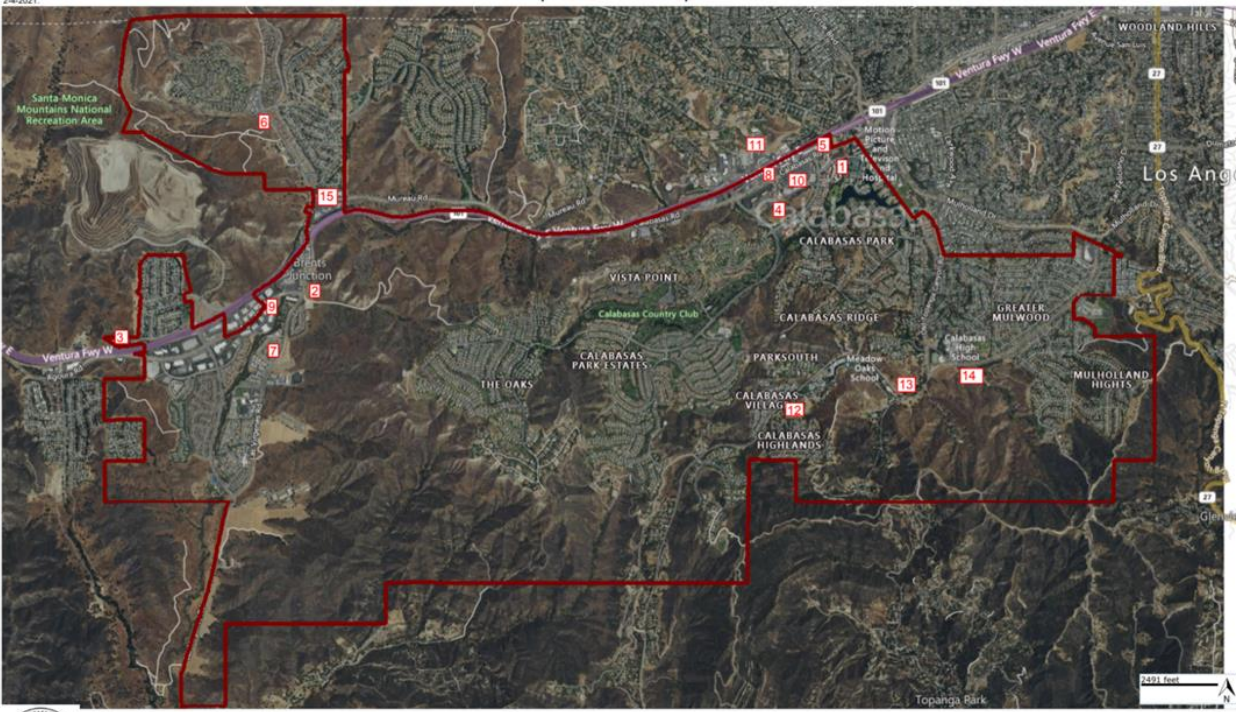
More traffic means more problems – ESPECIALLY as this is designated as the RURAL COMMUNITY. The more people, the more risk there is of evacuating safely from Mulholland Highway, a non-expandable single lane roadway each direction. This action would bottleneck rural communities even further.

People move here to experience and share in the beauty of natural spaces. You will destroy the aesthetic value of the land. By building here, you are showing your residents you do not care about them. You only care about the developers.

**Not to mention the disastrous environmental impact. All aspects of this land will be forever altered.**

**I grew up here. I went to school here. Elementary school, middle school, high school. Are you going to side with people like me, who have lived here our whole lives? Or are you going to be bought by developers?**

**What happened to all the promises of keeping our precious and finite open space open???**



Thank you,  
Samantha Greenberg  
23703 Summit Dr.  
Calabasas, CA  
91302

**From:** Dianne Gubin <[diannegubin@gmail.com](mailto:diannegubin@gmail.com)>  
**Sent:** Wednesday, February 3, 2021 4:08 PM  
**To:** info <[info@cityofcalabasas.com](mailto:info@cityofcalabasas.com)>  
**Subject:** Vehemently AGAINST Up Zoning - 12, 13, and 14

Dear City Commission,

I'm writing against Up Zoning 12, 13, and 14 as this would be terrible for the rural community. This is upzoning vacant land. DO NOT increasing density #12, #13, and #14 primarily.

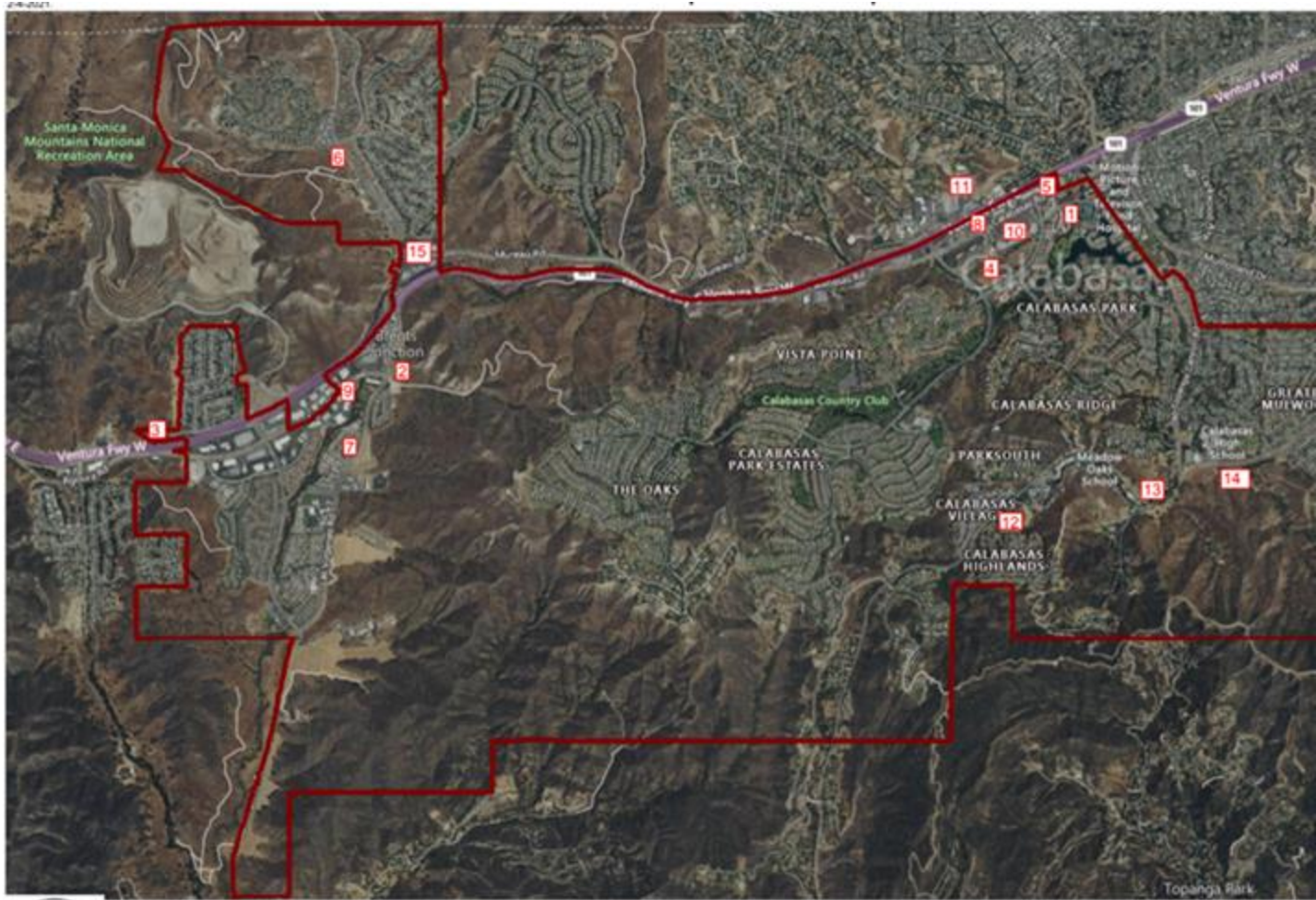
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**Please don't get me started on environmental impact of up zoning.**

**What happened to all the promises of keeping our precious and finite open space open???**



Thank you,

Dianne Gubin

**P.S. - I see this action in the same way you pushed the dog park through at Wild Walnut. Leaving 'as is' for a WILD area, was not even considered an option to be offered to local residents by the city.**

Dianne Gubin  
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**From:** [nancy@rothenbergs.net](mailto:nancy@rothenbergs.net) <[nancy@rothenbergs.net](mailto:nancy@rothenbergs.net)>  
**Sent:** Wednesday, February 3, 2021 5:01 PM  
**To:** info <[info@cityofcalabasas.com](mailto:info@cityofcalabasas.com)>  
**Subject:** Planning Commission Meeting 02/04/21 Comments Agenda Item #2

*Please forward to the Planning Commission – thank you.*

February 3, 2021

Dear Planning Commissioners:

Please accept my comments on the February 4, 2021 Planning Commission Meeting Agenda Item #2 - Discussion of housing site inventory for the 2021 – 2029 Housing Element Update.

Of the two options presented by Staff, Option A is by far the better choice. Option B includes three parcels on Mulholland Highway, which I know you are aware is the only evacuation route for many Calabasas communities, including the Highlands. We all live in an extreme fire danger area in the communities abutting Mulholland. Adding 500 units to land that is currently vacant in areas 12, 13 and 14 seems incredibly foolhardy at best, and very dangerous at worst.

Forgetting about the traffic impact of hundreds more cars pouring onto Mulholland each day (there is no easy public transportation option to get to the rest of Los Angeles), adding all these cars (500 units = 1,000 cars perhaps) trying to get onto Mulholland during a fire event is a recipe for disaster. I urge you to eliminate any consideration of higher density overlays in these areas, in any option.

Thank you for the opportunity to comment.

Nancy Rothenberg, President  
Calabasas Highlands HOA

**From:** Susan Ellis <[srellis8@gmail.com](mailto:srellis8@gmail.com)>

**Sent:** Wednesday, February 3, 2021 5:35 PM

**To:** info <[info@cityofcalabasas.com](mailto:info@cityofcalabasas.com)>

**Subject:** Please forward to the Planning Commission - RE: 2021 – 2029 Housing Element Update

Dear Planning Commission,

The fact that city council and city staff did not see fit to file an appeal is beyond disheartening. Calabasas is a city in a high fire zone. It doesn't matter that nearby cities who did file were not granted the appeal.....Calabasas very well could have been. We will never know. I am hopeful the new city council will direct staff to work in the interest of the citizens of Calabasas, rather than in the interest of developers, which is the direction the city has been going the past decade at least. So now, here we are.

The survey the city sent out was flawed. There was no way to qualify answers or make suggestions.

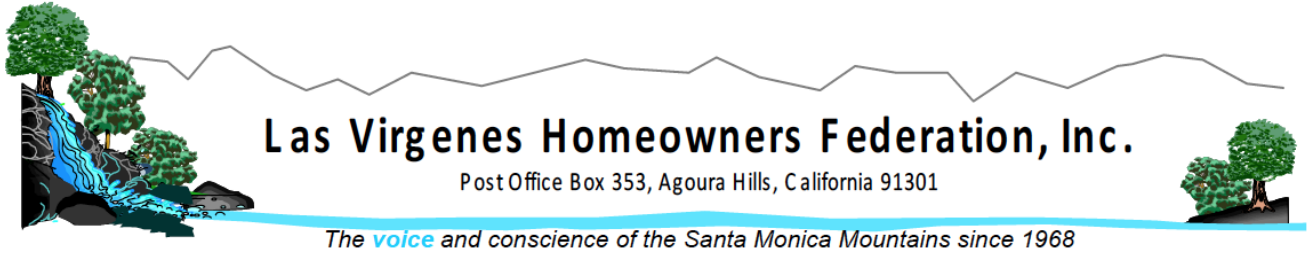
It is my understanding that the only difference between options A and B, as attached to the agenda, is that one has additional units added to Avalon and the other does not. It is also my understanding that the survey results did not show a desire to add units to Avalon. I would like to point out people could have been confused by the recently defeated Measure N. The reason for 'No on Measure N' was because there was no city oversight in the additional development. I believe the reason some people would have said no to more housing at Avalon was because they were confusing the issue of lack of city oversight from 'No on Measure N'.

I am concerned that by putting housing in with present commercial, it will result in overbuilding and taking away current views and the ambiance of the neighborhoods, specifically in the Las Virgenes area north of the freeway.

It is imperative that no housing is built in open space or on vacant parcels in the scenic corridors.

Having said all of the above, the only viable option is to put the bulk, if not all, of the additional housing in Craftsman's Corner.

Sincerely,  
Susan Ellis



February 3, 2021

Calabasas Planning Commission  
100 Civic Center Way  
Calabasas, CA 91302

**Re: Agenda Item #2 -- Discussion of housing site inventory for the 2021 – 2029 Housing Element Update**

Planning Commissioners:

Thank you for this opportunity to comment on the Calabasas housing site inventory.

Please consider including the following in your discussion:

**RHNA allocation recourse.**

Citywide - We are dismayed that the City did not file an appeal of the RHNA allocations as we inquired several times prior to the deadline. While SCAG recently (Jan. 30) denied the appeals of Agoura Hills and others, our understanding is that Pico Rivera and the County of Riverside were successful, and their numbers were reduced and the excess will now be distributed to other municipalities in southern California.

The City of Calabasas is unique in that it is 100% contained in a Very High Fire Hazard Severity Zone (VHFHSZ), whereas even the City of Agoura Hills is not. Calabasas is also further differentiated by several other criteria, including the city's VHFHSZ mountainous predominant landscape. Unincorporated Los Angeles County's portion of the Santa Monica Mountains which stretches from the coastal zone, to the North Area -- adjacent to Calabasas -- is also entirely in a VHFHSZ and the County does not assign any of its allocations in this landscape because of the severe fire risk.

So, the question is, how can the City reduce its allocation at this stage of the RHNA process which is slated to be finalized in March? The appeal process per se is over, but, what other recourse does the City have particularly if it can be determined that not all considerations and limitations

were part of SCAG's determination in assigning such significant numbers to a city like Calabasas? Can the City sue SCAG? Can the residents sue SCAG?

Based on our conversation yesterday with SCAG's Housing Program Manager and lead on RHNA, she will accept a letter from residents or the public explaining why more consideration needs to be given to reducing allocations in the City.

While we appreciate that the staff had according to the staff report, "one on one discussions with SCAG representatives to demonstrate the City's severe topographical constraints and extreme wildfire susceptibility", it would be extremely beneficial to actually see this input in writing -- letters from the City expressing these limitations and other paperwork. Also, details like who they spoke to at SCAG, etc. would be helpful in understanding the effect? Did these SCAG reps understand what the actual designation of a VHFHSZ now means?

Much of what is determined by SCAG is attributable to "Input" received from the City.

Everything has changed locally since the Woolsey fire in 2018 as far as limiting and prohibiting development, and the fact that the City will likely be encompassed technically in parkland this year -- in the Rim of the Valley Corridor or in the expansion of the Santa Monica Mountains National Recreation Area - are yet other considerations. The City Council voted on supporting this inclusion several years ago.

**The latest analysis and data provided by the Embarcadero Institute Report points out the flaws in the State's RHNA methodology:** (<https://embarcaderoinstitute.com/portfolio-items/double-counting-in-the-latest-housing-needs-assessment/>)

Excerpted: "The state has ordered more than 350 cities to prepare the way for more than 2 million homes by 2030. Senate Bill 828, co-sponsored by the Bay Area Council and Silicon Valley Leadership Group, and authored by state Sen. Scott Wiener in 2018, has inadvertently doubled the "Regional Housing Needs Assessment" in California. Use of an incorrect vacancy rate and double counting, inspired by SB-828, caused the state's Department of Housing and Community Development (HCD) to exaggerate by more than 900,000 the units needed in SoCal, the Bay Area, and the Sacramento area . . . "

Additionally, the latest studies show that CA is losing population, not gaining it, and there is a continual exodus including here in LA County, "In December a CA population estimate showed 135,600 more people left the state than moved in -- only the 12<sup>th</sup> time since 1900 the state has had a net migration loss, and it's the third largest ever recorded."

The bottom line is, the 358+ units of housing assigned to Calabasas via RHNA allocation must be and should have been vigorously challenged. Why has it not been? (The City of Malibu alternatively was assessed with just over 80 units of new housing.) This allocation poses a significant safety risk to the residents of the City and to the public's protected natural resources

in the Santa Monica Mountains. Circumstances have changed and it should be addressed. Forcing the impacts of this development density and intensity on a City with Calabasas' topography constraints, with a myriad of other new limitations and considerations, and real VHFHSZ risks, should not be accepted or accommodated, even at this juncture in the process.

**There is new legislation prohibiting development in VHFHSZs, SB 55 which could prevail.**

**SB 55**, Stern, Very high fire hazard severity zone: state responsibility area: development prohibition. "Existing law requires the Director of Forestry and Fire Protection to identify areas of the state as very high fire hazard severity zones based on specified criteria. Existing law requires a local agency to designate, by ordinance, very high hazard severity zones in its jurisdiction within 120 days of receiving recommendations from the director. This bill would, in furtherance of specified state housing production and wildfire mitigation goals, prohibit the creation or approval of a new development, as defined, in a very high fire hazard severity zone or a state responsibility area. By imposing new duties on local governments with respect to the approval of new developments in very high fire hazard severity zones and state responsibility areas, this bill would impose a state-mandated local program. The bill would include findings that changes proposed by this bill address a matter of statewide concern rather than a municipal affair and, therefore, apply to all cities, including charter cities."

**NO Up-zoning of Vacant Land Across the City.**

Urban sprawl has been identified by the lead fire ecologists across the state and as analyzed in the County's *After Woolsey Fire Report* as the single biggest risk of new fire -- including the need for new infrastructure. Up-zoning the remaining vacant land in the City unless it is a commercial urban infill parcel is urban sprawl. Furthermore, some of the most development-challenged or problematic parcels are those that remain. And several vacant parcels are contiguous to the protected open space areas and vitally important to wildlife and habitat connectivity.

Urban sprawl coupled with the negative impacts of a further intrusion of the Wildland Urban Interface (WUI) brings yet additional impacts to the environment and to the City's and County's sensitive biological resources.

Aside from negative viewshed impacts, more housing on difficult hillside or mountainous areas also necessitates the diversion of more fire-fighting resources away from current communities and is more costly to the City and County. Fuel modification impacts are significant as related to urban sprawl and development.

On Mulholland Highway, a protected scenic corridor, there are 4 schools within a short 2-mile stretch (Viewpoint, Calabasas High School, Chaparral, and A.C. Stelle Middle School) that in the event of an emergency -- especially in the pandemonium of a wind driven fire -- already seriously impede the ability of rural residential residents to safely evacuate. Further, there are communities exiting onto Mulholland Hwy who are single ingress/egress communities posing yet

further evacuation risks. Adding density as defined on the identified three vacant parcels (#12,13,14) would add significantly to the danger, and is incomprehensible.

Traffic impacts from intensified development on vacant parcels there would just further seriously overburden this roadway and are not mitigable.

The City has many more single ingress/egress communities, that are already over-burdened by today's allowable standards. Adding development on a vacant parcel like the Rancho Pet Kennel for example, would over-burden an already over-burdened adjacent existing community -- by utilizing their single access to get to a main artery. Further, a community cut-thru which this appears it would be, is not allowed in the General Plan.

Finally, as far as staff report references to the "online survey with 11 questions for Calabasas residents to provide feedback on the preference for various policy options", there are several issues with this survey including most residents knew nothing about it. How did the City ensure the participants were residents of the City? Furthermore, there was no availability to choose the "no project alternative" option, or to oppose the RHNA allocation and up-zoning of the city to accommodate it.

Therefore, we respectfully request that the Planning Commission consider recommending to Council that the City explore all of its options at this time, in reference to challenging the overall RHNA allocation.

We would like to thank the Calabasas Planning staff for the effort they have put forth in this difficult time, and on this very difficult subject.

We are focused as always on protecting communities, on protecting our wildland resources, and on quality of life.

Sincerely,  
Kim Lamorie  
President  
LVHF