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26500 W. Agoura Road • Suite 102-552 • Calabasas, CA 91302 • 818.906.4682 • CORBAmtb.com • info@corbamt.com

November 30, 2015

Michael Klein, Planner
City of Calabasas
100 Civic Center Way,
Calabasas, CA 91302
Email: mklein@cityofcalabasas.com

Re: Rondell Oasis Mitigated Negative Declaration

Esteemed Planners, Commissioners and City Council Members,

Thank you for allowing me to submit comments on the above-referenced matter on behalf of CORBA, the Concerned Off-Road Bicyclists Association. CORBA is an all-volunteer 501(c)(3) nonprofit dedicated to preserving open space, creating great trail experiences for all trail users including mountain bikers, and to educate cyclists and the public on cycling-related issues. CORBA was founded in 1987 and represents the greater mountain biking community of Los Angeles and Eastern Ventura Counties. We are an original founder of, and now one of hundreds of local chapters of the International Mountain Bicycling Association.

We are passionate about mountain biking, public trails and preserving our public open space for future generations. CORBA is committed to ensuring equal access for all trail users, and to contributing to everyone's enjoyment of the trails. CORBA organizes and coordinates activities that support mountain biking recreation and that promote the conservation, administration and the maintenance of the public lands.

CORBA's address of record is in Calabasas, just a few blocks from the proposed development. CORBA has been directly and collaboratively involved in the maintenance of trails in the Santa Monica Mountains, contributing thousands of volunteer hours to trail maintenance, restoration and educational efforts. We have also done extensive volunteer work on the New Millennium Trail, a showcase trail in the City of Calabasas and the Santa Monica Mountain National Recreation Area. In September 2012, CORBA was awarded a certificate of Appreciation by the City of Calabasas for our contributions to the trails of Calabasas, and in recognition of our 25th anniversary.

There are only two trailhead access points to the De Anza Loop Trail network, including the New Millennium Trail. The New Millennium Trail and De Anza National Historic Trail are both affected by this development. We do not feel that the developers have done an adequate job of reaching out to community stakeholders to seek feedback on their proposal.

This is evident in the Mitigated Negative Declaration document on which we are commenting. Figure 3 shows that trail access will be provided from the Hotel parking lot via stairs. Due to flooding concerns, a debris catchment basin will be constructed under the parking lot. These trails are designated multi-use, used by hikers, mountain bicyclists and equestrians. The proposed mitigations with stairs are not multi-use friendly, and would create a barrier to both equestrians and mountain bikers, two user groups that are already the most restricted when it comes to access to trails in the Santa Monica Mountains.

We believe that this development requires nothing less than a full Environmental Impact Report, complete with community outreach and public meetings to fully determine the impacts of this development on the community of Calabasas. The proposed MND does not adequately capture or assess the impacts which are obvious to us as trail advocates. As the largest trail advocacy group for off-road bicyclists in Los Angeles and Ventura Counties, we have never been contacted for comment or input by either the City Council, the City Parks, Recreation & Education Commission or the developer.

Trails have been shown in numerous studies to increase property values, quality of life, overall health of a community, and to provide the most return on investment dollar for recreational facility expenditures. This project would heavily impact not only the showcase New Millennium trail, a local favorite, but also the De Anza trail, a National Historic Trail listed on the Federal Register of Historic trails.

People use trails to escape the urban landscape of buildings, roads and development and return to a health-enhancing embrace with nature. The trail user experience will be diminished by a trail that first starts in a parking lot behind a hotel, then a staircase, and then be confronted with views of the back of a hotel for the first (or last) 900 feet of the trail. While urban infrastructure is visible from this section of the trail, the existing viewshed would be completely obstructed by the proposed hotel.

Earlier this year, CORBA worked with the Santa Monica Mountains Conservancy and Mountains Recreation and Conservation Authority to restore the east end of the De Anza trail, and access to the New Millennium Trail, with volunteers from local High School Mountain Bike teams including Calabasas High School. The Calabasas High School team uses the De Anza trail for training and access to the New Millennium trail loop.

On Page 21 the MND document lists "Environmental Factors Potentially Affected" and ONLY Biological Resources are listed as being affected. Recreation is listed as having "less than significant impact." Clearly this is incorrect, as the recreational opportunities for mountain bikers and equestrians will be negatively impacted if the proposed plan is implemented. There will also be an increase in vehicular traffic when and if the hotel goes into operation. The fact that these

two obviously affected factors were listed as “unaffected” demonstrates the incomplete nature of this MND.

Equestrian trail users and those with disabilities will be the most heavily impacted trail users. Currently, Rondell Street serves as unofficial off-street parking for the trail. It’s size makes it possible for equestrians to stage a horse trailer for access to New Millennium and De Anza trails. The proposed stairs to provide access to the trail will physically prevent equestrian trail users from accessing the trail. Those with disabilities may also have difficulty with the proposed stairs. We don’t believe the existing proposal meets the requirements of any nationally- or state-recognized ADA guidelines.

The assessment of “no legal access to the existing trail” fails to consider the ongoing and historic use of the trail and the inherent prescriptive easements. The document states that this was the original route used by Juan Bautista de Anza dating back centuries. The public has been parking what is signed as Rondell Street, and crossing this property for decades to access the De Anza Loop trail and it’s connection to the New Millennium Trail Loop. Apparently the street and the property belong to the developer, who has never made any indication that it was private property nor asserted their rights to restrict access.

While we appreciate the developer’s concessions to provide continued access to the trail, their proposed mitigations are clearly not compatible with accepted standards for a multiple-use trailhead, suitable for equestrians, cyclists, hikers and the public at large.

Speaking on behalf of the mountain bicycling community, we would prefer a separate trailhead that provides appropriate facilities for all trail user groups, and that doesn’t require trail users to search for a trailhead behind a hotel or negotiate a staircase. A re-route or extension of the trail to a new, more complete trailhead, separate from the hotel parking lot, would be a more acceptable mitigation.

Again, we respectfully request that a full Environmental Impact Report be completed, including public outreach to trail user groups and community stakeholders. From that we hope will emerge a more multi-use friendly and inviting trailhead design for this nationally recognized historic trail.

Sincerely,

Steve Messer
President
Concerned Off-Road Bicyclists Association

CC: City of Calabasas Parks, Education and Planning Commission
info@cityofcalabasas.com

Howard Cohen, President, Santa Monica Mountains Trails Council