

SANTA MONICA MOUNTAINS CONSERVANCY

RAMIREZ CANYON PARK
5750 RAMIREZ CANYON ROAD
MALIBU, CALIFORNIA 90265
PHONE (310) 589-3200
FAX (310) 589-3207



January 27, 2014

Tyler Montgomery
Los Angeles County Department for Regional Planning
Land Divisions Section
320 W. Temple Street, Room 1382
Los Angeles, California 90012

**“Escondido Falls” Malitex Residential Project
Tentative Parcel Map No. 071073
Notice of Preparation Comments**

Dear Mr. Montgomery:

The Santa Monica Mountains Conservancy (Conservancy) offers the following comments on the three proposed ridgeline houses adjacent to National Park Service Property in the Ramirez Canyon watershed. The Conservancy is aware that the subject ownership possesses unusually difficult challenges in regards to siting development to avoid ESHA and to create lot lines consistent with greater than a decade old Coastal Commission decisions that affect the property. Nonetheless the proposal for three homes would extend development, utilities and paved access a substantial distance into core Santa Monica Mountains habitat. The proposed project is far from the least ecologically and visually damaging three home projects that can be achieved on the site.

The dominant design criteria should be to make the three houses as invisible as possible from key public view areas – particularly Kanan-Dume Road, the soon to be constructed Coastal Slope Trail, and the Kanan-Edison Road Trail. The proposed project immediately violates this intent with a continuous 700-foot-long retaining wall in the prime viewshed from Kanan-Dume Road. The length of that 700-foot-long retaining wall would be accompanied by an unbroken 800-foot-long fuel modification zone. The visual analysis on the project must factor in that such long permanent features are particularly prominent-including driveway lighting.

The Draft Environmental Impact Report (DEIR) must consider an economically feasible alternative that provides an access road to the project that requires no above ground retaining wall on the west side. Based on our staff’s extensive work with the owner’s consultants around 2007-2008, it is quite safe to say that there is no geologic factor requiring a retaining wall supported driveway hanging off the edge of the ridge into Ramirez Canyon. That external retaining wall is a factor of the applicant trying to create

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three large flat building pads on a ridgeline under a scenario where the access road would not have to go between any of the houses. Such a between-pad access road would create less value for the applicant, but it would also create less value for multiple public viewsheds. Three large houses can be designed within the development footprint without the need for retaining wall supported common driveway.

It appears that the applicant may not have perfected access to the subject development parcels. The private fee simple ownership between the end of the County road easement and the subject development area appears to attenuate the applicant's connection to a public road. The DEIR must disclose if the owner of the attenuating property has given permission to pass to the applicant.

It is imperative that all development alternatives in the DEIR provide for a ten-foot-wide public trail easement dedication on Murphy Way to ensure that the public will be able to travel from the end of the County trail easement by the water tank to the northern boundary of the subject ownership.

The proposed access road bisects Mountains Recreation and Conservation Authority (MRCA) property. The Coastal Slope Trail must cross the access road between these two MRCA parcels. The DEIR must analyze and make provision for adequate terrain and road infrastructure to allow a trail crossing workable for equestrians. The DEIR preparer should contact the MRCA or the Conservancy on where the trail must cross the access road to achieve this minimum level of public access across a public road. One ill placed retaining wall on County land could ruin this section of Coastal Slope Trail.

The DEIR preparer should also contact the National Park Service, MRCA, and the Conservancy on where the Coastal Slope Trail will descend from Kanan Dume Road into Ramirez Canyon Park. The proposed homes would be visible from sections of this proposed trail. The National Park Service, MRCA, the Conservancy are all actively working on permitting the construction of this section of trail with the California Coastal Commission.

Please direct any questions to Paul Edelman of our staff at 310-589-3200 ext. 128 and send all future correspondence to his attention at the above letterhead address.

Sincerely,

IRMA MUÑOZ
Chairperson