

SANTA MONICA MOUNTAINS CONSERVANCY

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February 22, 2016

Ms. Sarah McGurk
Ventura County Planning Division
800 South Victoria Avenue, L# 1740
Ventura, California 93009

**Planned Development Permit for a Parcel Map Waiver-Lot Line,
Case No. PL-16-0006, 9899 Yerba Buena, Malibu**

Dear Ms. McGurk:

The Santa Monica Mountains Conservancy (Conservancy) offers the following comments on the proposed Planned Development Permit for a Parcel Map Waiver-Lot Line Adjustment that straddles the Arroyo Sequit and Little Sycamore Canyon watersheds. The proposed expansion of Parcel (A) APN 700-0-030-065 from 2.15 acres to 8.39 acres both changes the probable future building location and adds significant value to Parcel A. It moves a guaranteed side slope building location to a prominent ridgeline. It guarantees a larger development footprint on Parcel A. If the proposed action is not ministerial, then the net result must be an increase in public benefit sans environmental impact inducement. That public benefit should be large recorded deed restricted areas on both new parcels as shown in the attached figure as conditions for the lot line adjustment. Conservation easements to the Mountains Recreation and Conservation Authority (MRCA) would provide the most secure public benefit.

The background materials provided to the Conservancy address the presence of multiple deed restricted areas where either rock outcrops or oak trees exist. However these four deed restricted areas are located in unbuildable areas and thus do not factor in as substantial mitigation or development constraints for the development potential created by the proposed lot line adjustment.

The proposed new lots with their two houses and accessory development (that is likely to result from the proposed lot line adjustment) could cumulatively result in significant ecological and visual impacts. The proposed lot line adjustment contributes to potential future substantial adverse impacts. The existing deed restrictions do little if anything to define where future development including equestrian containment areas and vineyards could be located. Without such constraints on the front end, it must be assumed that

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development could be scattered over both parcels. Clustered development reduces impacts by creating overlap in fuel modification zones.

To assure the public that the proposed action would not result in significant environmental impacts, a condition must be added to the proposed action to include deed restrictions on the two new parcels as shown on the attached figure. Said deed restrictions must prohibit all disturbance including fuel modification. No easements or access provided after the date of County's receipt of this letter should be permitted or be allowed to record. The proposed deed restriction on Parcel B guarantees no additional impacts to the National Park Service's adjacent Circle X Ranch Park. The deed restricted area leaves ample space for large estates on both Parcel A and Parcel B clustered in the development area per C.C. of C. 8901.

If you have any questions for our agency, please contact Paul Edelman, Deputy Director of Natural Resources and Planning, at 310-589-3200, ext. 128, or by e-mail at edelman@smmc.ca.gov. Thank you for your consideration and the opportunity to comment.

Sincerely,

IRMA MUÑOZ
Chairperson