

**SANTA MONICA MOUNTAINS CONSERVANCY**

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May 23, 2016

Joshua Huntington, AICP  
County of Los Angeles  
Department of Regional Planning  
320 West Temple Street  
Los Angeles, California 90012

**Coastal Development Permit No. 201500043**  
**Project No. R2015-00871-(3)**  
**Single-Family Development at 24604 Mulholland Highway**

Dear Mr. Huntington:

The Conservancy offers the following comments regarding the proposed residential development project located in the Mulholland Scenic Corridor in the Cold Creek watershed (APN 4455-042-015). The project is one of four lots in a Parcel Map that was apparently approved by the California Coastal Commission in 1990 with no houses being built to date. Did the Coastal Development Permit for the Parcel Map include any conditions that pertain to the siting and scale of the proposed house and appurtenant structures?

The subject lot is located within a designated scenic resource area so any approved house location and height should maximize the protection of public scenic resources. The subject lot is also just several feet from a public trail that was presumably required as part of the Parcel Map approval. The subject lot is also just feet away from H1 habitat in a drainage bottom as defined by the Santa Monica Mountains Local Coastal Program (LCP), which includes streams and plant communities that function as riparian habitats and as habitats for rare, threatened, or endangered species.

The application proposes a house on the southern edge of a large cleared area. The southern edge of the large cleared area is also on the high point of an onsite knoll. To avoid or reduce multiple adverse visual and biological impacts the house should not be sited on top of the knoll which is also at the highest elevation on the lot. The house should be moved 50 feet to the north to significantly reduce such impacts. The attached figure shows how moving the house 50 feet to the north eliminates 0.25 acres of permanent fuel modification in H2 habitat and a smaller portion of H1 habitat. The proposed hammerhead turnaround can remain in place because its presence does not require pushing out the fuel modification zone. Likewise the applicant's pool and yard area could be on the south side of the house because such uses also do not require pushing out the fuel modification zone.

### **Need to Reduce Adverse Visual Impacts to Scenic Highway and Stokes Ridge Trail**

A section of the Stokes Ridge Trail begins at Mulholland Highway just south of the subject lot. As proposed the 6,840-square-foot home would be located at the property high point approximately 100 feet in elevation above where the trail begins at Mulholland Highway. Because the proposed pad site is on top of this knoll, even with a house height limitation of 18 feet, the house would be in plain sight both from Mulholland Highway traveling in both directions and from many sections of the established public trail.

View impacts to both the trail and the scenic highway are substantial but can be reduced. Significant view impact reduction can be obtained by moving the proposed house (all habitable structures) 50 feet to the north. With the revised house plan, the knoll would partially shield the house and all of its associated lighting from both the highway and the trail.

### **Avoidable Impacts to Sensitive Biological Resources from Adjusting the House Site**

As proposed, the house would create an approximately 0.43 acre of permanent fuel modification impact zone based a 200-foot horizontal measurement. If the house is moved 50 feet northward, the permanent loss of H2 habitat and H1 habitat buffer would be reduced by approximately 0.25 acre. All of that area potentially removed from the permanent fuel modification zone is also visible from the trail and highway. So a reduction of the fuel modification impact zone reduces visual impacts too.

Because all of new proposed fuel modification—both for the current house location and a location 50 feet to the north— is within designated H2 habitat in the Malibu-Cold Creek watershed, mitigation measures 1, 2, 3, and 11 in the biological assessment dated August 27, 2015 must be incorporated as conditions of approval.

There is no certainty that a house will be built on the lot to the south (APN 4455-042-017) or where it would be located. So dismissing some of the above described potential impacts to habitat from fuel modification based on potential future development is not valid.

### **Need for Permanent Land Protection Mechanism**

Permanent protection of the remaining habitat onsite cannot be guaranteed without mitigation in the form of a conservation easement or open space deed restriction. The Conservancy recommends that the County require a permanent open space deed restriction on all portions

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of the property located south of approved development. To provide effective habitat protection the deed restriction must include every square inch of land that is not already contained within the existing driveway easement to APN 4455-042-017 or the slope easement along Mulholland Highway.

The deed restriction must prohibit all future development, fencing, grading, walls, lighting, accessory structures, equestrian facilities, signage, non-native plants, and vineyards. The deed restriction should allow Fire Department-required fuel modification and native plant restoration.

If you have any questions, please contact Paul Edelman, Deputy Director for Natural Resources and Planning, by phone at (310) 589-3200, extension 128, or by email at [edelman@smmc.ca.gov](mailto:edelman@smmc.ca.gov).

Sincerely,

IRMA MUÑOZ  
Chairperson