

**SANTA MONICA MOUNTAINS CONSERVANCY**

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June 29, 2015

Rudy Silvas  
Department of Regional Planning  
Los Angeles County  
320 West Temple Street  
Los Angeles, California 90012

**Notice of Consultation Comments**  
**Project No. R2010-01119 - 30890 Mulholland Highway**  
**La Sierra Canyon**

Dear Mr. Silvas:

The Santa Monica Mountains Conservancy (Conservancy) offers the following comments and recommendations on the above-referenced project within the Mulholland Highway Scenic Corridor and the Upper La Sierra Canyon Significant Ecological Area. Also located adjacent to National Park Service property, the subject lot could hardly be located in a more ecologically and visually sensitive area of the Santa Monica Mountains National Recreation Area. Because of this sensitivity, the distribution of the improvements must maximize avoidance of visual and biological impacts.

As proposed the project would require over five acres of fuel modification with the clearance zone coming virtually to the edge of Mulholland Highway. The driveway would also require a minimum of ten feet of clearance on either side right on Mulholland Highway. The fuel modification would permanently reduce the natural visual screening of the proposed house from Mulholland Highway. The project would also require a permanent road to a proposed water tank with some level of required brush clearance. The tank and the road would be at an elevation with a high probability of visibility from Mulholland Highway. The project could also have extensive lighting for the driveway, the house pad, and the road up to the proposed barn.

The Notice of Consultation states that all visual impacts can be reduced to a level less than significant with mitigation. It is imperative that the applicant provide studies that conclusively demonstrate that the project would not result in substantial visual impacts. It is imperative that the applicant provide an inventory of the habitat and species that would be permanently damaged by annual fuel modification. Too much is at stake for such studies not to be prepared and circulated as part of a Mitigated Negative Declaration.

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At a minimum 5.0 acres of the property would be part of permanent fuel modification zone. That fuel modification zone would permanently degrade the majority of the Mountains Recreation and Conservation Authority's existing conservation easement. The visual footprint of the project would adversely impact the Mulholland Scenic Corridor.

Ideally the whole barn pad area would be removed from the project to reduce visual and grading impacts.

To mitigate for such mostly unavoidable significant biological and visual impacts, every square foot of the undeveloped property must be permanently protected via a deed restriction to the County or a conservation easement to the Mountains Recreation and Conservation Authority. The Mitigated Negative Declaration must include a highly detailed figure that shows the boundary of this permanently protected area. That conservation easement or deed restriction area must prohibit all activities other than fire department required fuel modifications and the applicant's proposed well and water distribution system.

The applicant must provide all necessary preliminary title reports and recordable legal descriptions for all relevant conservation easements and deed restrictions. We would appreciate if that additional requirement is included in the conditions. The MRCA has agreed to prepare the grants of conservation easement deeds.

The easements would prohibit all uses except fuel modification, planting vegetation indigenous to the Santa Monica Mountains, and drip irrigation. Lighting, fencing, materials storage, permanent irrigation, grading, herbicide, rodenticide, and non-native vegetation would be prohibited. We respectfully request that the County's conditions of approval require that all conservation easements be recorded by the MRCA prior to the issuance of any grading permits.

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Please contact Paul Edelman, Deputy Director of Natural Resources and Planning, at 310-589-3200, ext. 128 with any questions and future correspondence.

Sincerely,

LINDA PARKS  
Chairperson