



COUNTY OF LOS ANGELES

FIRE DEPARTMENT

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LOS ANGELES, CALIFORNIA 90063-3294
(323) 881-2401

P. MICHAEL FREEMAN
FIRE CHIEF
FORESTER & FIRE WARDEN

June 2, 2009

John Ainsworth, Deputy Director
All California Coastal Commissioners
California Coastal Commission
South Central Coast Area
89 South California Street, Suite 200
Ventura, CA 93001

Dear Mr. Ainsworth:

CITY OF MALIBU LCP AMENDMENT NO. MAL-MAJ-3-07 JUNE 10 ITEM #16A

CITY OF MALIBU LCP AMENDMENT NO. MAL-MAJ-1-08 JUNE 10 ITEM #16B (SANTA MONICA MOUNTAINS CONSERVANCY OVERRIDE)

We have reviewed the above listed Commission staff report(s) for the two Local Coastal Program Amendments to be presented at the June 10, 2009 Coastal Commission's public hearing. We recommend DENIAL of both proposed amendments and the Commission's staff recommendation to approve LCPA 1-08 as revised, unless mitigating measures are implemented.

Both Local Coastal Program Amendments (LCPA's) cover a large portion of the Malibu area which includes the Ramirez Canyon Park, Escondido Canyon Park, and Corral Canyon Park, all of which are located in the Very High Fire Hazard Severity Zone of Los Angeles County.

Both LCPA's propose significant intensification of use of Conservancy properties, including non-residential uses, large public events, and overnight camping. We are opposed to any new campgrounds, hike-in camps, trail camps or large group gatherings in very high fire risk areas. These activities could jeopardize public safety by unnecessarily increasing the risk of fire and requiring rapid evacuation of narrow box canyons served by limited access routes.

The Conservancy's Ramirez Canyon property was originally designed for single family residential use and was not intended as a public use park. The park property is accessed

SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:

AGOURA HILLS	BRADBURY	CUDAHY	HAWTHORNE	LA HABRA	LYNWOOD	PICO RIVERA	SIGNAL HILL
ARTESIA	CALABASAS	DIAMOND BAR	HIDDEN HILLS	LA MIRADA	MALIBU	POMONA	SOUTH EL MONTE
AZUSA	CARSON	DUARTE	HUNTINGTON PARK	LA PUENTE	MAYWOOD	RANCHO PALOS VERDES	SOUTH GATE
BALDWIN PARK	CERRITOS	EL MONTE	INDUSTRY	LAKEWOOD	NORWALK	ROLLING HILLS	TEMPLE CITY
BELL	CLAREMONT	GARDENA	INGLEWOOD	LANCASTER	PALMDALE	ROLLING HILLS ESTATES	WALNUT
BELL GARDENS	COMMERCE	GLEN DORA	IRWINDALE	LAWNDALE	PALOS VERDES ESTATES	ROSEMEAD	WEST HOLLYWOOD
BELLFLOWER	COVINA	HAWAIIAN GARDENS	LA CANADA FLINTRIDGE	LIMITA	PARAMOUNT	SAN DIMAS	WESTLAKE VILLAGE
						SANTA CLARITA	WHITTIER

John Ainsworth, Deputy Director
All California Coastal Commissioners
California Coastal Commission
June 2, 2009
Page 2

from Ramirez Canyon Road, which is a single means of access extending approximately one mile up-canyon from the Pacific Coast Highway. Ramirez Canyon Road is a substandard, privately owned, dead-end road that narrows to as little as 12 – 15 feet in some areas. It is non-compliant with the minimum 20' in width requirement of both the State of California and Los Angeles County Fire Codes. It is also the evacuation route for the canyon residents and the only ingress and egress route for emergency vehicles.

The Conservancy proposes to intensify the original use of the property by attracting large group gatherings and offering overnight camping. This increase in use should only be considered when it can be demonstrated that the proposed property is in strict compliance with all applicable Building and Fire Codes. A second alternate code compliant access road into Ramirez Canyon should be a precondition to any expansion of the current uses as outlined in the City of Malibu's proposed LCPA 3-07.

Both proposed LCPA's under the Hazards category require a Fire Protection and Emergency Evacuation Plan for Ramirez Canyon Park, Escondido Canyon Park, and Corral Canyon Park to be approved by the State Fire Marshal and the Los Angeles County Fire Department. The Los Angeles County Fire Department will not approve any Fire Protection and Emergency Evacuation Plan that shows any intensification of use, unless mitigating measures are implemented. Residential use of the Ramirez Canyon Park for the residential caretaker and his family may be allowed to continue upon verification of completion of the conditions of approval of Coastal Development Permit 4-98-334.

Section 30253 of the Coastal Act states in pertinent part that new development shall minimize risks to life and property in areas of high geologic, flood and fire hazard. This is not accomplished by allowing large numbers of the general public:

1. Into an area of high fire hazard served by a substandard road, through a heavily vegetated, relatively steep box canyon from which there is no alternative evacuation route.
2. Into structures that have not demonstrated to be in compliance with the current ignition resistant building standards for the proposed change in use.

However, consideration will be given by the Los Angeles County Fire Department to approve the Fire Protection and Emergency Evacuation Plan if the following mitigating measures are implemented:

1. An approved emergency access road no less than 20' in width with no vertical obstructions to structures and places of assembly.

John Ainsworth, Deputy Director
All California Coastal Commissioners
California Coastal Commission
June 2, 2009
Page 3

2. Approved fire proof shelters strategically located along the trails and in camping areas to accommodate park visitors when evacuation is obstructed by an approaching fire.
3. Open flame is prohibited.
 - a. Violations of open flame shall be a misdemeanor. Misdemeanor crimes are punishable by a maximum fine of \$1,000 and a County jail term of one year or less.
 - b. Violations during red flag warnings may be punishable by fines up to \$6,000.
4. The canyons and parks will be closed during periods of high fire danger when a red flag warning is declared by the National Weather Service.

If you have any questions regarding this matter, please feel free to contact Deputy Chief Scott Poster at (323) 881-2461.

Very truly yours,



P. MICHAEL FREEMAN

c: Supervisor Zev Yaroslavsky, Third District
Kate Dargan, California State Fire Marshal