

DECLARATION OF JEFFREY W. HOLT

I, Jeffrey W. Holt, declare as follows:

1. I am Jeffrey W. Holt, founder and owner of Mountain Geology, Inc. I have personal knowledge of the facts set forth herein, which are known by me to be true and correct, and if called as a witness, I could and would competently testify thereto.

Background

2. I am the founder, owner, and Principal Engineering Geologist of Mountain Geology, Inc., a consulting firm of professional geologists based in Simi Valley, California. I founded Mountain Geology, Inc., in 1984. Since its inception, Mountain Geology, Inc. has provided engineering geologic services in connection with thousands of development and construction projects for clients in Los Angeles, Ventura, and Santa Barbara counties.

3. A true and correct copy of my resume is attached as Exhibit A. As detailed in that resume, I have over 27 years of experience in the field of engineering geology. I have a Bachelor of Science degree in geology from California State University Northridge. Prior to founding Mountain Geology, Inc., I worked as a Senior Project Geologist for Kovacs-Byer and Associates, Inc., in Studio City, California. I am recognized as a Professional Geologist in the State of California (PG 3814), a Certified Engineering Geologist in the State of California (CEG 1200), and a Registered Environmental Assessor (REA 03137). I have also held leadership positions in the Association of Engineering Geologists (AEG), Southern California Section, including secretary, treasurer, vice chairman and chairman.

Preparation Of Engineering Geologic Memorandum

4. At the request of Wendy Rosen of the Upper Mandeville Canyon Association, I prepared an engineering geologic memorandum with respect to a proposed hillside trail within the Mountaingate Development, Vesting Tentative Tract 53072, located on Canyonback Road in Brentwood, California. A true and correct copy of that memorandum, dated March 2, 2005, is attached as Exhibit B.

1 5. The engineering geologic memorandum is based on data obtained from my
2 visual observation of the subject property, my years of experience with similar hillside and
3 canyon properties, including my years of experience working in Mandeville Canyon, and
4 my review of selected files and records of the City of Los Angeles Department of Building
5 and Safety.

6 6. In particular, in the course of preparing the engineering geologic
7 memorandum, I reviewed the following materials: (1) Review letter, prepared by the City
8 of Los Angeles Department of Building and Safety, dated August 17, 2000; (2)
9 Geotechnical Report, Project No. 030381-001, prepared by Leighton & Associates, Inc.,
10 dated November 30, 2001; (3) Geotechnical Report, Project No. 030381-002, prepared by
11 Leighton & Associates, Inc., dated March 18, 2003; (4) Geotechnical Report, Project No.
12 030381-003, prepared by Leighton & Associates, Inc., dated January 18, 2004; (5) Review
13 letter, prepared by the City of Los Angeles Department of Building and Safety, dated July
14 22, 2004; (6) Geotechnical Report, Project No. 030381-003, prepared by Leighton &
15 Associates, Inc., dated September 20, 2004; (7) Review letter, prepared by the City of Los
16 Angeles Department of Building and Safety, dated November 22, 2004; (8) Geology and
17 Geotechnical Report, Project No. 030381-003, prepared by Leighton & Associates, Inc.,
18 dated December 17, 2004; and (9) Review letter, City Log 41716-02, prepared by the City
19 of Los Angeles Department of Building and Safety, dated January 19, 2005; and (10)
20 various other materials attached to the engineering geologic memorandum.

21 7. I have also reviewed a map of the proposed trail alignment, a true and correct
22 copy of which is attached as Exhibit C, and a geologic map depicting landslides and other
23 geologic features in the vicinity, prepared by Leighton & Associates, a true and correct
24 copy of which is attached as Exhibit D.

25 **Site Description And Geologic Conditions**

26 8. The proposed trail alignment and Vesting Tentative Tract 53072 are located
27 on the southern flank of the Santa Monica Mountains in Brentwood, California.
28 Specifically, the area is located between Canyonback Road and Mandeville Canyon Road,

1 north of Sunset Boulevard and west of the San Diego Freeway, in a developed residential
2 neighborhood.

3 9. The existing Canyonback Trail is located on Canyonback Ridge. The
4 ridgeline is a stable and safe location for a trail.

5 10. The proposed trail alignment is situated on steep slopes between Canyonback
6 Ridge, which parallels Canyonback Road, to the east, and Mandeville Canyon Road, to the
7 west. These slopes feature an average slope gradient of 1:1 (45 degrees).

8 11. Single family residences are present along Mandeville Canyon Road, below
9 the proposed trail alignment. Physical relief from Canyonback Ridge down to Mandeville
10 Canyon is on the order of 500 feet.

11 12. Drainage from the proposed trail area is concentrated through various west-
12 trending tributary canyons. This concentrated drainage flows into the Upper Mandeville
13 Canyon area, which lies at the base of the watershed. Flood control and storm drainage
14 systems are located within the canyon bottom near Mandeville Canyon Road. However,
15 these flood control and storm drainage systems are subject to failure during heavy rains,
16 especially when filled with debris. As a result of this concentrated drainage, Mandeville
17 Canyon Road has experienced flooding and mudflow problems over the past 50 years.

18 13. The area of the proposed trail and watershed is underlain by fill, loose
19 residual soil, and landslide debris. The soil underlying the slopes on the eastern portion of
20 the site, in the Upper Mandeville Canyon area, is subject to downhill creep and erosion.

21 14. Underneath the soil is bedrock consisting of Santa Monica slate. The
22 bedrock in the area of the proposed trail is of various depths, and in some places exceeds a
23 depth of 60 feet.

24 15. Regional geologic maps indicate that foliation planes within the underlying
25 slate bedrock dip shallowly towards the north. North-facing and northeast-facing slopes in
26 this area are considered potentially unstable.

27 16. Several remnants of prehistoric landslides have been mapped on the steep
28 slopes in the vicinity of the proposed trail. The landslide areas are considered potentially

1 unstable. They have been sources of mudflows and debris flows, which have been
2 problematic for properties along Mandeville Canyon Road over the past 50 years.

3 17. I have also reviewed the map titled "Crown HOA 'Bypass Trail,'" a true and
4 correct copy of which is attached as Exhibit E. This map fairly and accurately depicts the
5 location of the proposed trail, as shown on the proposed trail map (Exhibit C), in relation
6 to the landslides and other geologic features shown on Leighton & Associates' geologic
7 map of the area (Exhibit D). As shown on the "Crown HOA 'Bypass Trail'" map, the
8 proposed trail passes directly through or in the vicinity of six landslides, labeled Qls-1,
9 Qls-2, Qls-2a, Qls-3, Qls-3a, and Qls-4. In addition, the proposed trail passes directly
10 through or near a slump, labeled Qs, and four other possible landslides or slumps.

11 Conclusions

12 18. The proposed trail alignment is located on very steep slopes, underlain by
13 unstable earth materials and landslide remnants which are considered potentially unstable.

14 19. These steep slopes have been subject to mudflows, debris flows, landslides,
15 and flooding, which have been a constant nuisance and hazard for residents in Mandeville
16 Canyon.

17 20. Construction of a trail in this area would require grading on the slopes.
18 However, any grading on these sensitive slopes will increase the potential for additional
19 mudflows, debris flows, landslides, and flooding to occur, which could adversely affect the
20 properties at the toe of slopes along Mandeville Canyon Road.

21 21. Moreover, due to the steepness of the slopes in the vicinity of the proposed
22 trail, it would not be possible to construct a trail in such a way to conform to current codes
23 and maintain public safety. Specifically, current codes allow grading only on a 2:1 slope,
24 whereas the slopes in the proposed trail area have a considerably steeper 1:1 gradient.

25 22. The only way to properly construct a trail on these steep slopes, conforming
26 to current codes, would be to build a raised trail, with retaining walls for support of
27 excavated areas and future fill. The retaining walls would have to be supported by piles, at
28 regular intervals, penetrating down through the fill, soil and landslide debris and founded

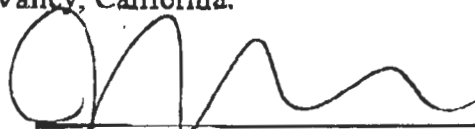
1 into the bedrock. Because of the depth of the bedrock in the proposed trail area, which in
2 places exceeds 60 feet, I do not believe that construction of such a trail is possible.
3 However, even assuming that it were possible, construction of the proposed trail would be
4 extremely costly.

5 23. Even assuming proper construction of a raised trail, the steep slopes and
6 unstable earth materials in the vicinity of the trail area would cause regular erosion and
7 landslides, particularly in the rainy winter months. The erosion and landslides could block
8 public access to the trail, pending maintenance and clearing of debris.

9 24. It is also possible that a trail could be improperly constructed by grading
10 directly on the steep 1:1 slopes. For example, I have reviewed an e-mail dated July 30,
11 2004, from Mary Ann Webster, Chair of the Sierra Club Santa Monica Mountains Task
12 Force, to Richard Zien of the Crown Homeowners Association, a true and correct copy of
13 which is attached as Exhibit F. In that e-mail, Ms. Webster proposes constructing a trail
14 on the western slope of Canyonback, either with a trails contractor and tractor, at a cost of
15 approximately \$25,000, or with the manual labor of a volunteer or paid trail crew. I
16 consider this proposal to be extremely ill-advised. As discussed above, cutting a trail
17 directly on 1:1 slopes would violate current codes and jeopardize public safety. In my
18 opinion, such improper construction of a trail would increase the potential for mudflows
19 and landslides which could adversely affect properties below.

20 I declare under penalty of perjury under the laws of the State of California that the
21 foregoing is true and correct.

22 Executed April 22, 2005, at Simi Valley, California.

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25 Jeffrey W. Holt
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