

CALIFORNIA COASTAL COMMISSION

SOUTH CENTRAL COAST AREA
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Agenda Item IX

MRCA

3/2/2011

Agenda Item 15

SMMC

2/28/11



DATE: January 12, 2011

TO: Commissioners and Interested Persons

FROM: John Ainsworth, Deputy Director
Steve Hudson, South Central District Manager
Barbara Carey, Supervisor, Planning and Regulation
Deanna Christensen, Coastal Program Analyst

SUBJECT: **ADOPTED FINDINGS** for the Santa Monica Mountains Conservancy and the Mountains Recreation and Conservation Authority PUBLIC WORKS PLAN (PWP) approved at the October 13, 2010 Commission Meeting in Oceanside, CA.

STAFF NOTE

At its October 13, 2010 meeting, the Commission approved the subject Public Works Plan with suggested modifications as recommended by staff in the staff report dated September 29, 2010 and addendums dated October 11, 2010 and October 12, 2010, with one change. At the meeting, Suggested Modification No. 31 was changed to require that the Santa Monica Mountains Conservancy and the Mountains Recreation and Conservation Authority, in consultation with California Department of Parks and Recreation, Los Angeles County Fire Department, and the State Fire Marshall, shall conduct a 1-yr. study and pilot project that analyzes the potential fire hazard and incidents/accidents associated with the use of propane cook-stoves versus electric cook-stoves at Camp Areas 1 and 2 of Malibu Bluffs and other public campgrounds to determine if the ban on the use of propane cook-stoves is warranted. The results of the study and pilot project shall be submitted to the Executive Director of the Coastal Commission for review and approval. If it is determined that propane cook-stoves pose no greater fire hazard risk than electric stoves, then the use of propane cook-stoves shall be allowed at all designated campsites throughout the Plan area.

The Commission adopted the staff recommendation for approval as modified. The following resolution, suggested modifications, and findings were adopted by the Commission on October 13, 2010, upon conclusion of the public hearing.

EXECUTIVE SUMMARY

Coastal Act Section 30605 provides for the submittal of Public Works Plans ("PWP") to the Coastal Commission as an alternative to project-by-project coastal development permit review for public works projects. The public works plan process allows for an efficient and expeditious process for planning and implementation of public works

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projects, and in the case of the proposed plan, will eliminate the need to coordinate permit processing through separate jurisdictions and/or processing numerous permits for individual, and potentially non-contiguous properties of the plan area. Once the PWP is certified by the Commission, subsequent review by the Commission of any project contained in the PWP is limited to imposing conditions to ensure consistency of the project with the PWP. The Santa Monica Mountains Conservancy (“SMMC”) and the Mountains Recreation and Conservation Authority (“MRCA”) have submitted a proposed PWP to serve as the facilities plan for recreation and parks areas within the Malibu/Santa Monica Mountains coastal area, including Ramirez Canyon Park, Escondido Canyon Park, the Latigo Trailhead property, Corral Canyon Park, and the Conservancy-owned Malibu Bluffs. The proposed improvements include parking, camp areas with associated support facilities, and trail improvements to support existing recreational demand and to facilitate an increased level of accessibility for visitors with diverse backgrounds, interests, ages, and abilities. The PWP includes development standards and design criteria for the proposed trail and park improvements that are intended to maximize access and recreation opportunities while protecting coastal resources. The standard of review for the portions of the proposed plan located within the City of Malibu is the Malibu certified LCP. The standard of review for the portions of the plan located in unincorporated Los Angeles County is the Chapter 3 policies of the Coastal Act. Although Los Angeles County has a certified Coastal Land Use Plan (LUP), the Coastal Local Implementation Plan for the LUP was never completed and certified. Therefore, the standard of review is the Chapter 3 policies of the Coastal Act, with the County’s LUP providing guidance.

The Coastal Act and the Malibu LCP require that: maximum public access to the shoreline is provided for all the people; lower cost visitor and recreational facilities are protected, encouraged, and, where feasible, provided; upland areas necessary to support coastal recreational uses are reserved; and public recreational facilities are distributed throughout the area so as to mitigate against the impacts, social and otherwise, of overcrowding or overuse by the public of any single area. The proposed PWP serves to provide the Coastal Act’s and the Malibu LCP’s high priority uses of public access and recreational facilities. The City of Malibu and the Santa Monica Mountains National Recreation Area receive millions of visitors annually from the greater Los Angeles Area and the demand for access and recreation opportunities, including camping opportunities, exceeds the supply. There is a significant demand both locally and on statewide basis for public camping, hiking, and recreation facilities within public parklands. The proposed PWP has been developed in recognition of the demand for coastal public access and recreation opportunities and the mandates of the Malibu LCP and of the Coastal Act to meet this demand for local and non-local visitors with diverse interests and abilities.

Staff is recommending that the Commission certify the proposed PWP with suggested modifications. The suggested modifications include the clarification of the standard of review for future development proposals, and additional policy direction regarding environmentally sensitive habitat. Further, the modifications address the addition of

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specificity and timing requirements for the provision of habitat mitigation, including creation, enhancement, and restoration as well as the planting of native trees. The modifications also require the addition of several plans as appendices to the PWP, and address the phasing of uses at Ramirez Canyon Park. Additionally, the modifications require the deletion of new emergency fire shelters at proposed camp and trail locations within the plan area. The suggested modifications are necessary to ensure that the PWP is consistent with the applicable policies and provisions of the City of Malibu certified Local Coastal Program for the portions of the plan area within the City, and to ensure that the PWP is consistent with the Chapter 3 policies of the Coastal Act for those areas in the unincorporated area of Los Angeles County. The PWP will serve to protect and provide lower cost visitor-serving and coastal recreation facilities, and to ensure that the new and expanded access and recreational facilities are sited and designed to minimize impacts to environmentally sensitive habitat areas and visual resources. The suggested modifications can be found beginning on page 9 of this staff report. In conclusion, staff recommends that the Commission deny the PWP as submitted and certify it if modified as suggested in this staff report. The Commission considered alternatives to the proposed PWP. There are no other feasible alternatives or mitigation measures available that would further lessen any significant adverse effect that the approval would have on the environment. Only as modified can the Commission find that the PWP is consistent with all applicable policies of the Malibu LCP and the Chapter 3 policies of the Coastal Act, as applicable.

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I. PROCEDURAL ISSUES

A. ELIGIBILITY AND STANDARD OF REVIEW

Section 30605 of the Coastal Act states:

To promote greater efficiency for the planning of any public works or state university or college or private university development projects and as an alternative to project-by-project review, plans for public works or state university or college or private university long-range land use development plans may be submitted to the commission for review in the same manner prescribed for the review of local coastal programs as set forth in Chapter 6 (commencing with Section 30500). If any plan for public works or state university or college development project is submitted prior to certification of the local coastal programs for the jurisdictions affected by the proposed public works, the commission shall certify whether the proposed plan is consistent with Chapter 3 (commencing with Section 30200). The commission shall, by regulation, provide for the submission and distribution to the public, prior to public hearings on the plan, detailed environmental information sufficient to enable the commission to determine the consistency of the plans with the policies of this division. If any such plan for public works is submitted after the certification of local coastal programs, any such plan shall be approved by the commission only if it finds, after full consultation with the affected local governments, that the proposed plan for public works is in conformity with certified local coastal programs in jurisdictions affected by the proposed public works. Each state university or college or private university shall coordinate and consult with local government in the preparation of long-range development plans so as to be consistent, to the fullest extent feasible, with the appropriate local coastal program. Where a plan for a public works or state university or college or private university development project has been certified by the commission, any subsequent review by the commission of a specific project contained in the certified plan shall be limited to imposing conditions consistent with Sections 30607 and 30607.1. A certified long-range development plan may be amended by the state university or college or private university, but no amendment shall take effect until it has been certified by the commission. Any proposed amendment shall be submitted to, and processed by, the commission in the same manner as prescribed for amendment of a local coastal program.

Section 30114 of the Coastal Act states, in part:

“Public works” means the following:

(c) All publicly financed recreational facilities, all projects of the State Coastal Conservancy, and any development by a special district.

Section 30118 of the Coastal Act defines the phrase “special district” to mean:

any public agency, other than a local government as defined in this chapter, formed pursuant to general law or special act for the local performance of governmental or proprietary functions within limited boundaries.

Furthermore, the City of Malibu certified Local Coastal Program defines “Major Public Works and Major Energy Facilities” as follows:

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- facilities that cost more than one hundred thousand dollars (\$100,000) with an automatic annual increase in accordance with the Engineering News Record Construction Cost Index, except for those governed by the provisions of Public Resources Code Sections 30610, 30610.5, 30611 or 30624. Notwithstanding the criteria above, "major public works" also means publicly financed recreational facilities that serve, affect, or otherwise impact regional or statewide use of the coast by increasing or decreasing public recreational opportunities or facilities.

The proposed Public Works Plan (PWP) encompasses land area and involves public access and recreation improvements located within two coastal permit jurisdictions; the City of Malibu and unincorporated Los Angeles County. The plan is proposed by the Santa Monica Mountains Conservancy (SMMC) and Mountains Recreation and Conservation Authority (MRCA) to enhance public access and recreational opportunities of regional significance and will include use of public funds for plan implementation. Therefore, the proposed PWP meets the definition of a plan for public works that may be submitted to the Commission pursuant to Section 30605 of the Coastal Act. The proposed improvements are not likely to occur simultaneously, but will be implemented within different portions of the plan area as funds and/or additional trail easements and land purchase opportunities become available. The public works plan process allows for an efficient and expeditious process for planning and implementation of public works projects, and in the case of the proposed plan, will eliminate the need to coordinate permit processing through separate jurisdictions and/or processing numerous permits for individual, and potentially non-contiguous properties of the plan area.

Section 30605 of the Coastal Act and Section 13356(b) of Title 14 of the California Code of Regulations ("14 CCR") provide that where a proposed public works plan is submitted prior to certification of the Local Coastal Program ("LCP") for the jurisdiction affected by the public works plan the Commission's standard of review for certification of the proposed plan is Chapter 3 of the Coastal Act. Section 30605 and 14 CCR Section 13357(a) also state that where a public works plan is submitted after the certification of the LCP any such public works plan shall be approved by the Commission only if it finds, after consultation with the affected local government(s), that it is in conformity with the certified LCP. Therefore, the standard of review for the portions of the proposed plan located within the City of Malibu is the Malibu certified LCP. The standard of review for the portions of the plan located in unincorporated Los Angeles County, where there is no certified LCP, is the Chapter 3 policies of the Coastal Act. Although Los Angeles County has a certified Coastal Land Use Plan (LUP), the Coastal Local Implementation Plan for the LUP was never completed and certified. Therefore, the LCP has not been certified, and the standard of review is the Chapter 3 policies of the Coastal Act, with the County's LUP providing guidance.

B. PUBLIC PARTICIPATION

Section 30503 of the Coastal Act requires public input in preparation, approval, certification and amendment of any Public Works Plan. The SMMC and the MRCA held

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a public hearing and approved the proposed PWP and certified the Final Environmental Impact Report on August 23, 2010. SMMC and MRCA Resolutions approving the PWP and authorizing submission to the Coastal Commission are attached as Exhibits 13 and 14. The hearing was noticed to the public and all interested parties.

C. LOCAL GOVERNMENT CONSULTATION

14 CCR Section 13357 requires that review of Public Works Plans after certification of a Local Coastal Program must be undertaken after consultation with the affected local government. After determining the PWP submittal properly submitted and complete in early September, 2010, Commission staff formally notified the City of Malibu of the proposed PWP submittal on September 13, 2010, in order to initiate the consultation process between Commission staff and the City (Exhibit 16). Due to the large volume of the PWP submittal, Commission staff directed the City to websites where the PWP documents are available for easy access. Commission staff also notified the City that the item was tentatively scheduled for the October Commission hearing in Oceanside and that input and recommendations would need to be received by September 23, 2010, to ensure they are included in the staff recommendation that will be sent to the Commission for consideration prior to the hearing. To date, the City of Malibu has not formally responded.

D. AVAILABILITY OF ENVIRONMENTAL DOCUMENTS

All environmental information relied on by the Commission and its staff, including the proposed PWP, the Final Environmental Impact Report, biological reports, hydrological reports, geotechnical reports, and applicant and public correspondence is available for review at the below-referenced Ventura Office of the California Coastal Commission.

Additional Information

For further information about this report, please contact Deanna Christensen, Coastal Program Analyst, at the South Central Coast District Office of the Coastal Commission, 89 S. California St., Ste. 200, Ventura, CA 93001; telephone number (805) 585-1800.

Substantive File Documents

City of Malibu certified Local Coastal Program (LCP); Los Angeles County Malibu/Santa Monica Mountains 1986 Land Use Plan (LUP); Malibu Public Access Enhancement Plan - Public Works Plan Final Environmental Impact Report (SCH #: 2009091018), August 2010; Santa Monica Mountains Conservancy Resolution 10-41 approving the PWP and authorizing submission to the California Coastal Commission; Santa Monica Mountains Conservancy Resolution 10-40 certifying the PWP Final EIR; Mountains Recreation and Conservation Authority Resolution 10-109 approving the PWP and authorizing submission to the California Coastal Commission; Mountains Recreation and Conservation Authority Resolution 10-108 certifying the PWP Final EIR; California Coastal Commission Revised Findings Staff Report dated September 22, 2009 for Malibu LCP Amendment No. MAL-MAJ-1-08; Riparian Habitat Evaluation for Ramirez Canyon Park by LSA Associates Inc., dated August 30, 2002; Coastal Development Permit No. 4-98-334 (SMMC); City of Malibu Coastal Development Permit No. 05-187 (Gerlach) for 28460 Via Acero.

II. STAFF RECOMMENDATION

Staff recommends the Commission adopt the following resolutions and findings. The appropriate motions to introduce the resolutions and staff recommendations on those motions are provided just prior to the resolutions.

A. DENIAL OF PUBLIC WORKS PLAN AS SUBMITTED

Motion: *I move that the Commission certify the Santa Monica Mountains Conservancy and Mountains Recreation and Conservation Authority Public Works Plan as submitted.*

Staff Recommendation for Denial of Public Works Plan:

Staff recommends a NO vote. Failure of this motion will result in denial of the Public Works Plan as submitted and the adoption of the following resolution and findings. The motion to certify passes only by an affirmative vote of a majority of the appointed Commissioners.

Resolution I:

The Commission hereby denies certification of the Santa Monica Mountains Conservancy and Mountains Recreation and Conservation Authority Public Works Plan and adopts the findings stated below on the grounds that the Plan does not conform with the Chapter 3 policies of the Coastal Act and the City of Malibu Local Coastal Program, as applicable. Certification of the Plan would not comply with the California Environmental Quality Act because there are feasible alternatives or feasible mitigation measures that would substantially lessen the significant adverse effects that the approval of the Plan would have on the environment.

B. CERTIFICATION OF PUBLIC WORKS PLAN WITH MODIFICATIONS

Motion: *I move that the Commission certify the Santa Monica Mountains Conservancy and Mountains Recreation and Conservation Authority Public Works Plan if modified as suggested by Commission staff.*

Staff Recommendation for Certification of Public Works Plan With Modifications:

Staff recommends a YES vote. Passage of this motion will result in certification of the Public Works Plan as modified. The motion to certify passes only by affirmative vote of a majority of the appointed Commissioners.

Resolution II:

The Commission hereby certifies the Santa Monica Mountains Conservancy and Mountains Recreation and Conservation Authority Public Works Plan as modified and adopts the findings stated below on the grounds that the Plan as modified conforms with

the Chapter 3 policies of the Coastal Act and the City of Malibu Local Coastal Program, as applicable. Certification of the Plan as modified complies with the California Environmental Quality Act because either 1) feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the Plan on the environment, or 2) there are no further feasible mitigation measures or alternatives that would substantially lessen any significant adverse impacts of the Plan on the environment.

III. SUGGESTED MODIFICATIONS

Commission Staff recommends that the Commission certify the proposed Public Works Plan if modified with the following changes (proposed language in the PWP is shown in straight type. The language suggested by the Commission to be deleted is shown in ~~line-out~~ and the language suggested to be added is shown in underline. Other suggested modifications that do not directly change PWP text (e.g., revisions to maps, figures, instructions) are shown in italics):

SUGGESTED MODIFICATION 1:

Section 3.1.1 Trails, Page 3-7

Trails Policy 2: Public access and recreation opportunities ~~on lands subject to the Malibu Parks Public Access Enhancement Plan Overlay and other Los Angeles County lands identified in this Plan~~ shall be provided and enhanced by ~~developing trail resources pursuant to~~ implementation of a number of site-specific trail improvements as conceptually illustrated on the Malibu Parks Public Access Enhancement Plan Proposed Trail and Park Resources Map (Figure 8), and which shall be subject to the implementation measures of ~~the Malibu Parks Public Access Enhancement Plan Overlay and this Plan, as applicable.~~

SUGGESTED MODIFICATION 2:

Section 3.1.1 Trails, Page 3-8

Trails Implementation Measure 8: Trails shall be located, designed, and maintained to avoid or minimize impacts to ESHA and other coastal resources by utilizing established trail corridors, following natural contours, and avoiding naturally vegetated areas with significant native plant species to the maximum extent feasible. Trail construction resulting in unavoidable impacts to ESHA may be permitted if found consistent with all applicable resource protection policies of this Plan, ~~the Malibu Parks Public Access Enhancement Plan Overlay, the City of Malibu LCP and the Coastal Act.~~

SUGGESTED MODIFICATION 3:

Section 3.1.2 Low Impact Campsites, Page 3-11

Camp Policy 1: Public access and recreation opportunities on lands subject to this Plan shall be provided by developing low-cost visitor-serving camp facilities, including low impact campsites, in the general locations indicated on the ~~Trail Resources Map designated as Local Coastal Program - City of Malibu Park Lands Map 6~~ and the Proposed Trail and Park Resources Map included as Figure 8 of this Plan, subject to the resource protection policies in

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the City of Malibu LCP and the specific implementation measures included in the Malibu Parks Public Access Enhancement Plan Overlay and of this Plan. For purposes of this Plan, low impact campsites (and associated support facilities including, where appropriate, picnic tables, potable water, self-contained chemical/composting restrooms, shade trees, water tanks, portable fire suppression apparatus, and fire-proof cooking stations) are “carry-in carry-out” campsites accessed by foot or wheelchair and which have an educational or interpretative component including signage related to the natural resources of the Santa Monica Mountains. Low impact campsites, as defined, constitute a resource dependent use. Access to low impact campsites shall be supported by parking areas and designated ADA drop-offs located in non-ESHA areas.

SUGGESTED MODIFICATION 4:

Section 3.1.2 Low Impact Campsites, Page 3-11

Camp Policy 2: Limited overnight campsites, including “low impact” campsites, are defined as permitted uses in parklands subject to the ~~Malibu Parks Public Access Enhancement Plan Overlay~~ and should be developed within park boundaries for public use to provide a wider range of recreational opportunities and low-cost visitor serving opportunities for visitors of diverse abilities, where impacts to coastal resources are minimized and where such sites can be designed within site constraints and to adequately address public safety issues.

SUGGESTED MODIFICATION 5:

Section 3.1.2 Low Impact Campsites, Page 3-11

Camp Policy 3: Development of limited overnight campsites within designated park boundaries, as generally indicated on the ~~Trail Resources Map designated as Local Coastal Program - City of Malibu Park Lands Map 6~~ and the Proposed Trail and Park Resources Map included as Figure 8 of this Plan, shall be encouraged where impacts to environmentally sensitive habitat areas, water quality, and visual and archaeological resources are avoided or minimized, and where such improvements can be designed consistent with site constraints and fire safety standards.

SUGGESTED MODIFICATION 6:

Section 3.1.2 Low Impact Campsites, Page 3-11

Camp Implementation Measure 2: ~~Campsites proposed and developed pursuant to the Malibu Parks Public Access Enhancement Plan shall consist of designated and improved camps areas located within park boundaries in the general locations indicated on the Trail Resources Map designated as Local Coastal Program - City of Malibu Park Lands Map 6 and the Proposed Trail and Park Resources Map included as Figure 8 of this Plan. Consistent with Table 2, Permitted Uses, of the City of Malibu Local Implementation Plan, these campsites are permitted uses in the Public Open Space (OS) Zone and are therefore not subject to conditional and/or special use permit requirements.~~

SUGGESTED MODIFICATION 7:

Section 3.1.2 Low Impact Campsites, Page 3-12

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Camp Implementation Measure 4: Campsites shall be located to take advantage of the unique and diverse resources of Ramirez Canyon Park, Corral Canyon Park, and the Conservancy-owned Malibu Bluffs, and to facilitate disabled access where possible. To the maximum extent feasible, campsites shall be located in previously disturbed areas (where the habitat has not been illegally removed or degraded) ~~(except those described in Policy 3.6 of the City of Malibu Land Use Plan)~~ to minimize impacts to ESHA and other coastal resources.

SUGGESTED MODIFICATION 8:

Section 3.1.2 Low Impact Campsites, Page 3-21

Camp Implementation Measure 10: Proposed campsite locations shall be evaluated by a qualified biologist or environmental resource specialist to ensure that, to the maximum extent feasible, 1) campsites are appropriately located in previously disturbed areas (where the habitat has not been illegally removed or degraded) ~~(except those described in Policy 3.6 of the City of Malibu LUP)~~, 2) campsites are appropriately set back from the top of bank of any adjacent stream, and 3) to assess potential impacts to adjacent habitat areas and provide recommendations for mitigation, as applicable.

SUGGESTED MODIFICATION 9:

Section 3.1.2 Low Impact Campsites, Page 3-21

Camp Implementation Measure 13: ~~Consistent with all public safety provisions and the resource protection policies of this Plan, the City of Malibu LCP and the Coastal Act,~~ Campsites should be designed in accordance with current accessibility guidelines and technical requirements. Where full compliance with accessibility guidelines is determined to be infeasible, campsites shall incorporate those accessible features that can be reasonably accommodated.

SUGGESTED MODIFICATION 10:

Section 3.1.3 Public Transit, Page 3-22

Transportation Policy 1: Public access opportunities to parklands and recreation areas subject to the ~~Malibu Parks Public Access Enhancement Plan Overlay or other Los Angeles County lands identified in this Plan~~ shall be maximized by encouraging and expanding transportation options supported by adequate support facilities ~~pursuant to development of site-specific transit and facility improvements and subject to the implementation measures of the Malibu Parks Public Access Enhancement Plan Overlay and this Plan.~~

SUGGESTED MODIFICATION 11:

Section 3.1.4 Public Outreach and Education, Page 3-24

Public Outreach and Education Policy 2: Public access to parklands subject to the ~~Malibu Parks Public Access Enhancement Plan Overlay or other Los Angeles County lands identified in this Plan~~ shall be maximized by improving accessibility of parklands for visitors of diverse backgrounds, interests and abilities. This Plan specifically recognizes Ramirez Canyon Park as an existing parkland with well established amenities available to support various public use programs including picnic areas, restrooms, educational displays, sitting benches, gardens, easily accessible terrain, and a riparian area interpretive trail. This Plan provides for a number

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of park-specific improvements and plan specifications designed to accommodate visitors with various disabilities (e.g., mentally and physically challenged), and further provides detailed program and operational requirements of public outreach and educational opportunities necessary to ensure that public programs are implemented to the maximum extent feasible within the site constraints of Ramirez Canyon Park.

SUGGESTED MODIFICATION 12:

Section 3.1.4 Public Outreach and Education, Page 3-25

Public Outreach and Education Implementation Measure 5: To ensure that access and recreational opportunities for visitors with diverse abilities are maximized, the Conservancy/MRCA may continue all public outreach programs at Ramirez Canyon Park, may provide additional day-use picnic facilities at Ramirez Canyon Park, the Latigo Trailhead property, Corral Canyon Park and the Conservancy-owned Malibu Bluffs, and may implement park improvements to provide for limited overnight camping opportunities at Ramirez Canyon Park, Corral Canyon Park and the Conservancy-owned Malibu Bluffs in compliance with ADA and consistent with the policies of this Plan, ~~the City of Malibu LCP and the Coastal Act.~~

SUGGESTED MODIFICATION 13:

Section 3.1.5 Support Facilities, Page 3-27

Facilities Implementation Measure 1: To maximize access to parklands and trails consistent with the other provisions of ~~the Malibu Parks Public Access Enhancement Plan Overlay~~ and this Plan, new, limited parking and trailhead facilities may be provided at Ramirez Canyon Park, the Latigo Trailhead property, Corral Canyon Park, and the Conservancy-owned Malibu Bluffs, provided they are consistent with the resource protection policies of ~~the City of Malibu LCP~~ and this Plan.

SUGGESTED MODIFICATION 14:

Section 3.1.5 Support Facilities, Page 3-27

Facilities Implementation Measure 2: New support facilities shall be located at park entrances and along existing primary trail routes, provided they can be so located consistent with the resource protection policies of ~~the City of Malibu LCP~~ and this Plan. They will be located within previously disturbed areas (where the habitat has not been illegally removed or degraded) where feasible, to minimize impacts to sensitive habitat areas to the maximum extent feasible.

SUGGESTED MODIFICATION 15:

Section 3.1.5 Support Facilities, Page 3-27

Facilities Implementation Measure 5: New support facilities shall be strategically located in disturbed areas (where the habitat has not been illegally removed or degraded) ~~(except those described in Policy 3.6 of the City of Malibu LUP)~~ and outside of any ESHA but shall also be located adjacent to vegetated areas whenever feasible where existing vegetation may provide a natural buffer between support facilities, trail corridors and/or public viewing areas. Where necessary, native vegetation may be planted to provide a buffer and to screen support facilities.

SUGGESTED MODIFICATION 16:

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Section 3.2.1 ESHA, Page 3-32

ESHA Policy 1: Any area in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and which could be easily disturbed or degraded by human activities and developments are Environmentally Sensitive Habitat Areas (ESHA). ESHAs shall be protected against significant disruption of habitat values, and only uses dependent on such resources shall be allowed within such areas. Development in areas adjacent to ESHA shall be sited and designed to prevent impacts which would significantly degrade such areas and shall be compatible with the continuance of those habitat and recreation areas. ~~all areas subject to proposed access and recreation improvements found to constitute ESHA pursuant to the provisions of Chapter 4 of the Malibu Local Implementation Plan or the Coastal Act, as applicable, shall be subject to the implementation measures contained in this Plan, as well as other, generally applicable resource protection provisions of City of Malibu LCP and the Coastal Act.~~

SUGGESTED MODIFICATION 17:

Section 3.2.1 ESHA, Page 3-32

ESHA Policy 2: Trails to and within public parklands, camp facilities, public outreach and educational programs and/or related support facilities (e.g. parking, public restrooms, picnic amenities, ranger/ maintenance supervisor housing, nature centers, administrative personnel facilities related to the daily operation and maintenance of parklands and park programs), and special programs and events conducted at Ramirez Canyon Park, ~~are defined as permitted uses in the Malibu Parks Public Access Enhancement Plan Overlay and other lands of Los Angeles County subject to this Plan,~~ and shall be permitted to be constructed, opened and operated for intended public use or benefit where it is determined feasible to locate, design, and maintain such facilities and uses so as to avoid, or minimize and fully mitigate, potential impacts to ESHA.

SUGGESTED MODIFICATION 18:

Section 3.2.1 ESHA, Page 3-32

ESHA Policy 6: Based upon a site-specific biological assessment, any area that meets the ESHA criteria is ESHA and shall be accorded all the protection provided for ESHA in the Plan. The following areas shall be considered ESHA, unless there is compelling site-specific evidence to the contrary:

- a) Any habitat area that is rare or especially valuable from a local, regional, or statewide basis.
- b) Areas that contribute to the viability of plant or animal species designated as rare, threatened, or endangered under State or Federal law.
- c) Areas that contribute to the viability of species designated as Fully Protected or Species of Special Concern under State law or regulations.
- d) Areas that contribute to the viability of plant species for which there is compelling evidence of rarity, for example, those designated 1b (Rare or endangered in California and elsewhere) or 2 (rare, threatened or endangered in California but more common elsewhere) by the California Native Plant Society.

SUGGESTED MODIFICATION 19:

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Section 3.2.1 ESHA, Page 3-32

ESHA Implementation Measure 1: Trails, camp facilities, park uses as described in this Plan, and necessary support facilities shall be considered permitted uses for those parkland areas subject to ~~the Malibu Parks Public Access Enhancement Plan Overlay and other Los Angeles County lands subject to this Plan, as identified on the Public Parkland Map and Proposed Trail and Park Resources Map (Figure 8).~~ Trails and other resource dependent park uses, and necessary support facilities associated with resource dependent uses, located within or adjacent to areas mapped as ESHA shall be sited and designed to avoid significant disruptions of habitat values within the ESHA and avoid significantly degrading such areas. Minor disruptions to ESHA resulting from resource dependent uses shall be mitigated pursuant to ~~the City of Malibu Local Implementation Plan provision 3.4.2(D)(7)(a)(viii) and as implemented by~~ ESHA Implementation Measure 8. Such uses shall also minimize impacts to other coastal resources through, among other things, mitigation measures, including, but not limited to, siting for new permitted park improvements in previously disturbed areas, signs, and limited fencing shall be implemented as necessary to protect ESHA.

SUGGESTED MODIFICATION 20:

Section 3.2.1 ESHA, Page 3-33

ESHA Implementation Measure 3: New park facilities shall be located a minimum of 100 feet from the top of bank of all streams or from the outer edge of riparian vegetation, whichever is the most protective, to the maximum extent feasible, excluding those special provisions for low-impact campsites and associated support facilities as provided for ~~per City of Malibu Local Implementation Plan provisions D.2.a.v and D.5.a.iii and as implemented by~~ Camp Implementation Measure 5 and Facilities Implementation Measure 3 of this Plan, ~~respectively,~~ and new park facilities at Ramirez Canyon Park, a limited (no more than 10 spaces) Latigo trailhead parking and picnic area for Escondido Canyon Park, and an ADA compliant drop-off area at Corral Canyon Park which shall be located no less than 25 feet from top of stream bank. Riparian area buffers shall be planted with appropriate native species to provide canopy and vegetative structure to improve habitat function and value of buffer areas.

SUGGESTED MODIFICATION 21:

Section 3.2.1 ESHA, Page 3-33

ESHA Implementation Measure 4: Proposed park facility locations shall be evaluated by a qualified biologist (1) to ensure that, to the maximum extent feasible, (a) facilities are appropriately located in previously disturbed areas (where the habitat has not been illegally removed or degraded) ~~(except those described in Policy 3.6 of the City of Malibu Land Use Plan),~~ and (b) facilities are appropriately setback from the top of bank of any adjacent stream, and (2) to assess potential impacts to habitat areas and provide recommendations for alternatives to avoid impacts, and if impacts are unavoidable, for mitigation measures, as applicable.

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SUGGESTED MODIFICATION 22:

Section 3.2.1 ESHA, Page 3-33 to 3-34

ESHA Implementation Measure 8: ~~Consistent with City Malibu Local Implementation Plan provision 3.4.2(D)(7)(a)(viii), prior to improving and opening~~ As part of a NOID for development of any trail or other resource dependent park facility for public use in an area of naturally vegetated habitat, a site-specific biological assessment shall be prepared by a qualified biologist or environmental resource specialist to evaluate the vegetation and habitat of the project area to determine potential impacts to ESHA that may occur. Should the biological assessment determine that unavoidable adverse impacts to ESHA may result from permitted development, the impacts must be mitigated to avoid any significant disruption or degradation of habitat values, in accordance with the following standards: ~~The following additional mitigation measures shall also be implemented:~~

- A. Mitigation measures for permanent impacts to ESHA shall include habitat creation, restoration and/or enhancement of degraded habitat and shall be monitored for a period of no less than five years following completion. Mitigation ratios for permanent impacts to specific types of habitat shall be as follows:

<u>Habitat</u>	<u>Mitigation Ratio (no. of acres of habitat required for each acre of habitat impacted)</u>
Coastal sage scrub/chaparral	3 to 1
Riparian vegetation areas	3 to 1
Native trees (oak, walnut, sycamore, alder, or toyon)	10 to 1
Native grasslands	3 to 1

- B. Mitigation measures for temporary impacts to ESHA shall include re-vegetation of the disturbed area, consistent with this Implementation Measure and with ~~To address temporary impacts to ESHA, all disturbed areas shall be re-vegetated consistent with City Malibu Local Implementation Plan provision 3.4.2(D)(8)(a)(iv) and as implemented by Water Quality Implementation Measure 4 of this Plan, and shall be monitored for a period of no less than five years following completion.~~
- C. As part of a NOID for development that will have unavoidable impacts to ESHA, a Mitigation/Restoration Plan shall be prepared by a qualified biologist or environmental resource specialist that is consistent with this Implementation Measure, the "Biological Concept Mitigation/Restoration Plan Memorandum" by Dudek included in Appendix B, and shall include, at a minimum, the following information elements:
- (a) the location of the mitigation site(s);
 - (b) the plant species to be used, container sizes, and seeding rates;

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- (c) the plant materials' sources and lead time;
 - (d) a schematic depicting the mitigation areas;
 - (e) a planting schedule (plantings should occur between October 1 and April 30, when feasible, to take advantage of the winter/spring rainy season);
 - (f) a description of installation requirements, irrigation sources and methodology, erosion control, and maintenance and monitoring requirements;
 - (g) a description of the goals of the restoration program;
 - (h) a weed eradication plan (i.e., measures to properly control exotic vegetation on site);
 - (i) site-specific success criteria;
 - (j) a detailed monitoring program and summary of the annual reporting requirements (a report describing as-built status of the revegetation program and including topographic maps and planting locations shall be provided to the Coastal Commission for review within 90 days of mitigation site preparation and planting. An annual report shall be provided to the Coastal Commission by January 1 in years one through five (after planting the mitigation sites). The annual reports shall include (a) an overview of the mitigation efforts; (b) pre-project photos of all the mitigation areas taken from photo points to be used for all subsequent photos; (c) photos taken from each photo point established prior to project activities; (d) the number, by species, of plants replaced; (e) the survival, percentage cover, and height of both tree and shrub species; and (f) the methods used to assess these parameters);
 - (k) contingency measures should the success criteria not be met; and,
 - (l) identification of the responsible party(ies) for meeting the success criteria and providing for conservation of the mitigation site(s) in perpetuity.
- ~~(MM BIO-1.1) Mitigation for impacts to sensitive vegetation communities shall occur in accordance with the ratios and guidelines described in the County's LUP and the City's LIP, where appropriate, to compensate for direct impacts to sensitive vegetation communities, including sage scrub and chaparral communities, native grassland habitat, and riparian and bottomland habitats.~~
 - ~~(MM BIO-1.2) Mitigation efforts shall occur on lands currently managed by the Conservancy/MRCA. If it is determined during the planning process that additional land is required beyond what is supported by existing Conservancy/MRCA-managed lands, then an appropriate off-site location(s) will be identified and approved by the Coastal Commission and CDFG prior to implementation.~~
- D. ~~(MM BIO-1.3)~~ The mitigation sites shall be revegetated with indigenous plant species of local (Santa Monica Mountains) genetic stock. No plant species listed as problematic and/or invasive by the CNPS (<http://www.cnps.org/>), the California Invasive Plant Council (formerly the California Exotic Pest Plant Council) (<http://www.cal-ipc.org/>), or as may be identified by the State of California shall be employed or allowed to naturalize or persist on the site. No plant species listed as a "noxious weed" by the State of California or the federal government shall be utilized within the property. All plant palettes should be reviewed by a qualified biologist and/or habitat restoration specialist familiar with those plants native or endemic to this region of California.

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E. Mitigation/Restoration Plans shall be implemented concurrent with project construction.

SUGGESTED MODIFICATION 23:

Section 3.2.1 ESHA, Page 3-35

ESHA Implementation Measure 12 (MMs BIO-2.1 and BIO-10.2): ~~Prior to the issuance of a grading permit(s) for areas adjacent to ESHA, a biologist shall be retained and approved by the Conservancy/MRCA and CDFG to monitor construction activities. The biologist will monitor all grading and other significant ground disturbing activities in or adjacent to ESHA open space areas, and shall be on site during any clearing of habitat (annual ground cover, shrubs, or trees) to ensure that the project complies with the applicable standard conditions and mitigation measures. The monitoring biologist will flush sensitive species (avian or other mobile species) from occupied habitat areas immediately prior to brush-clearing and earth-moving activities.~~

SUGGESTED MODIFICATION 24:

Section 3.2.1 (B) Hydromodification, Page 3-37 to 3-38

ESHA Implementation Measure 18: ~~Existing streambed modifications in Ramirez Canyon Park are part of a larger system of channelization in Ramirez Canyon where numerous neighboring properties contain similarly modified channels. The Conservancy/MRCA shall initiate a site-specific, comprehensive analysis of the modified stream channel at Ramirez Canyon Park to assess opportunities for streambed and riparian habitat restoration and potential onsite and offsite flooding or erosional hazards that might result from removing or other modification of the channelization structures.~~

Within 180 days of final PWP certification, the Conservancy/MRCA shall ensure that a detailed Final Ramirez Creek Restoration Plan that is consistent with this Plan and the "Biological Concept Mitigation/Restoration Plan Memorandum" by Dudek included in Appendix B is prepared and submitted to the Commission as part of a NOID. Once the NOID is approved, the Conservancy/MRCA shall implement the plan consistent with any conditions imposed upon the NOID. The Final Plan may be implemented in phases, but at a minimum, stream bank restoration of lower Ramirez Creek as shown on Sheet 55 of Appendix A must be installed within one (1) year of the NOID approval, and the remainder of the proposed Ramirez Creek restoration and associated mitigation must be installed within five (5) years of the NOID approval.

"Final PWP certification" means not only that the approvals/certifications of the PWP, the Environmental Impact Report for the PWP, and the Malibu Local Coastal Program Amendment for the Malibu Parks Public Access Enhancement Plan Overlay (MAL-MAJ-1-08) (collectively referred to as the "Planning Approvals") are final and effective, but also that any potential administrative and judicial challenges to any of the Planning Approvals either did not occur within the allowable timeframe (so that they are time barred) or proceeded to completion, including through any available appeals or the like, and did not result in the overturning, invalidation, or remand of any of the Planning Approvals.

ESHA Implementation Measure 19: ~~If the analysis conducted pursuant to ESHA Implementation Measure 18 reveals a need for additional streambed alterations, and such alterations are allowable under policies 3.32 and 3.33 of the certified Malibu LUP,~~

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~~bioengineering methods or “soft solutions” shall be developed as an alternative to constructing rock revetments, vertical retaining walls or other “hard structures” along Ramirez Canyon Creek wherever feasible. If bioengineering methods are demonstrated to be infeasible, then other alternatives may be considered.~~ Any development that includes protective measures along Ramirez Canyon Creek shall demonstrate that existing development and/or public use areas in Ramirez Canyon Park are in danger from flood hazards, that the proposed protective device is the least environmentally damaging alternative, that it is sited and designed to avoid and minimize impacts to the habitat values of the riparian corridor along the creek and the recreational and public access use of the Park property along the creek, and that any unavoidable impacts have been mitigated to the maximum extent feasible.

SUGGESTED MODIFICATION 25:

Section 3.2.1 (B) Hydromodification, Page 3-38

ESHA Implementation Measure 20 (~~MMs BIO-1.11 and HYD-3.3~~): Alteration of natural streams for the purpose of stream crossings (vehicular or pedestrian) shall be prohibited, except where the alteration is not substantial, there is no other feasible alternative to provide access to public recreation areas, and the alteration does not restrict movement of fish or other aquatic wildlife: Any other stream crossings shall be accomplished by bridging that is designed to avoid placement of columns within the stream bed or channel and avoids removal of natural riparian vegetation to the maximum extent feasible. Where minor alteration of natural streams for the purpose of stream crossings (vehicular or pedestrian) are necessary to provide access to and within public recreation areas, the following development standards shall be applied:

- ~~• Use of Arizona crossings shall be limited to repair and maintenance of existing, legal crossings consistent with the repair and maintenance provisions of Section 13.4.2 Repair and Maintenance Activities of the City of Malibu Local Coastal Program Local Implementation Plan.~~
- ~~• All new stream crossings shall consist of a span bridge design which minimizes placement of any new structures within the stream bed or channel and avoids removal of natural riparian vegetation to the maximum extent feasible.~~
- Bioengineering methods shall be used wherever feasible.
- Construction activities shall be scheduled to occur during the dry season.
- Staging areas outside of the riparian canopy shall be identified and flagged for construction workers and to store materials.
- Monitoring of stream crossing construction activities shall be conducted by a qualified biologist or environmental resource specialist. The biologist/resource specialist shall be responsible for advising construction workers on potential resource damage avoidance prior to the commencement of any on site activities.

These provisions shall not apply to existing or proposed pedestrian stream crossings along hiking trails where no alteration of the natural stream channel is required to accommodate access.

SUGGESTED MODIFICATION 26:

Section 3.2.1 (D) Native Trees, Page 3-39

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ESHA Implementation Measure 23 (MM-BIO-1.4): All development involving access and recreation improvements within areas containing one or more native oak (*Quercus* species), California Walnut (*Juglans californica*), Western Sycamore (*Platanus racemosa*), Alder (*Alnus rhombifolia*), or Toyon (*Heteromeles arbutifolia*) tree, that has at least one trunk measuring six inches or more in diameter, or a combination of any two trunks measuring a total of eight inches or more in diameter, measured at four and one-half feet above natural grade shall be subject to the provisions of Chapter 5 Native Tree Protection of the Malibu Local Coastal Program Local Implementation Plan, which requires the preparation of a tree protection plan and mandates mitigation at a ratio of 10:1 for significant impacts to all native trees meeting the size dimensions above. In order to implement a cohesive mitigation plan for the project, trees planted in accordance with the tree protection plan may be integrated into the habitat restoration plan for the project.

New development shall be sited and designed to preserve native oak, walnut, sycamore, alder, and toyon trees to the maximum extent feasible. As part of a NOID for development within areas containing one or more native oak (*Quercus* species), California Walnut (*Juglans californica*), Western Sycamore (*Platanus racemosa*), Alder (*Alnus rhombifolia*), or Toyon (*Heteromeles arbutifolia*) tree, that has at least one trunk measuring six inches or more in diameter, or a combination of any two trunks measuring a total of eight inches or more in diameter, measured at four and one-half feet above natural grade, a site-specific Tree Protection Plan shall be prepared by a qualified biologist or resource specialist to evaluate the native trees of the project area to determine potential impacts that may occur. Should the Tree Protection Plan determine that unavoidable adverse impacts to native trees may result from permitted development, the impacts must be mitigated in accordance with the following standards:

<u>Impact</u>	<u>Mitigation Ratio (no. of replacement trees required for every 1 tree impacted/removed)</u>
<u>Removal</u>	<u>10:1</u>
<u>> 30% encroachment into protected zone</u>	<u>10:1</u>
<u>Encroachment that extends within 3 ft. of tree trunk</u>	<u>10:1</u>
<u>Trimming branch with over 11 in. diameter</u>	<u>10:1</u>
<u>10-30% encroachment into protected zone</u>	<u>5:1</u>
<u>< 10% encroachment into protected zone</u>	<u>None. See ESHA Implementation Measure 25 below for monitoring requirements.</u>

Protected Zone means that area within the dripline of the tree and extending at least five feet beyond the dripline, or 15 feet from the trunk of the tree, whichever is greater.

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SUGGESTED MODIFICATION 27:

Section 3.2.1 (D) Native Trees, Page 3-39

ESHA Implementation Measure 24 (MMs ~~BIO-1.5 through BIO-1.10~~): As part of a NOID for development that will have unavoidable impacts to native trees and require mitigation pursuant to ESHA Implementation Measure 23 above, a Native Tree Replacement Planting Program, prepared by a qualified biologist, arborist, or other resource specialist, which specifies replacement tree locations, tree or seedling size planting specifications, and a ten-year monitoring program with specific performance standards to ensure that the replacement planting program is successful shall be submitted for the review and approval of the Coastal Commission. The tree replacement seedlings must be planted on parkland where there is suitable conditions/habitat. The approved Native Tree Replacement Planting Program shall be implemented concurrent with project construction.

~~A habitat restoration plan to address impacts to both sensitive uplands and wetlands habitats shall be prepared by qualified personnel with experience in Southern California ecosystems and native plant revegetation techniques.~~

- ~~• The habitat restoration plan should include, at a minimum, the following information:

 - ~~(a) the location of the mitigation site(s);~~
 - ~~(b) the plant species to be used, container sizes, and seeding rates;~~
 - ~~(c) the plant materials' sources and lead time;~~
 - ~~(d) a schematic depicting the mitigation areas;~~
 - ~~(e) a planting schedule;~~
 - ~~(f) a description of installation requirements, irrigation sources and methodology, erosion control, and maintenance and monitoring requirements;~~
 - ~~(g) a description of the goals of the restoration program~~
 - ~~(h) a weed eradication plan (i.e., measures to properly control exotic vegetation on site);~~
 - ~~(i) site-specific success criteria;~~
 - ~~(j) a detailed monitoring program;~~
 - ~~(k) contingency measures should the success criteria not be met;~~
 - ~~(l) a summary of the annual reporting requirements; and,~~
 - ~~(m) identification of the responsible party(ies) for meeting the success criteria and providing for conservation of the mitigation site(s) in perpetuity.~~~~
- ~~• Planting of the revegetation sites should occur between October 1 and April 30, when feasible, to take advantage of the winter/spring rainy season.~~
- ~~• Interim annual and final performance criteria for each potential mitigation site and vegetation community are provided below. Vegetation cover is expressed as percent absolute cover for native and non-native vegetation. For native cover, the percentages listed shall be the minimum attained to be considered successful, and for non-native cover, the percentages listed shall not be exceeded.~~

Mitigation Site	Vegetation Community	Year 1 (%)	Year 2 (%)	Year 3 (%)	Year 4 (%)	Year 5 (%)
Malibu Bluffs	Coastal scrub	15	30	50	65	75
	Perennial exotic cover	5	5	5	5	5
Corral Canyon	Coastal scrub	15	25	40	50	65

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Mitigation Site	Vegetation Community	Year 1 (%)	Year 2 (%)	Year 3 (%)	Year 4 (%)	Year 5 (%)
	Perennial exotic cover	30	20	10	10	10
	Native Grasslands	10	20	35	45	55
	Perennial exotic cover	30	20	10	10	10
Tuna/Las Flores Canyon	Chaparral/Coastal scrub	15	25	40	50	65
	Perennial exotic cover	5	5	5	5	5
King Gillette Ranch	Southern willow scrub	20	35	50	65	80
	Sycamore-Coast live oak woodland	15	25	35	55	75
	Perennial exotic cover	5	5	5	5	5
Ramirez Canyon	Southern willow scrub	20	35	50	65	80

- A report (describing as-built status of the revegetation program and including topographic maps and planting locations) shall be provided to the Coastal Commission (and ACOE, CDFG, and RWQCB for wetlands mitigation) for review within 90 days of mitigation site preparation and planting.
- An annual report shall be provided to the Coastal Commission and other reviewing resource agencies (ACOE, CDFG, and RWQCB for wetlands) by January 1 in years one through five (after planting the mitigation sites). The annual reports shall include (a) an overview of the mitigation efforts; (b) pre-project photos of all the mitigation areas taken from photo points to be used for all subsequent photos; (c) photos taken from each photo point established prior to project activities; (d) the number, by species, of plants replaced; (e) the survival, percentage cover, and height of both tree and shrub species; and (f) the methods used to assess these parameters.

SUGGESTED MODIFICATION 28:

Section 3.2.1 (D) Native Trees, Page 3-40

ESHA Implementation Measure 25 (MMs BIO-13.1): Where development encroaches into less than 30% of the protected root zone of native trees, each affected tree shall be monitored annually for a period of not less than 10 years. An annual monitoring report shall be submitted by MRCA for review by MRCA the Coastal Commission for each of the 10 years. Should any of these trees be lost or suffer worsened health or vigor as a result of the proposed development, the applicant shall mitigate the impacts at a 10:1 ratio with seedling-sized trees.

SUGGESTED MODIFICATION 29:

Section 3.2.1 (D) Native Trees, Page 3-42

ESHA Implementation Measure 31: Future development not specifically described and analyzed in this Plan that may potentially affect environmentally sensitive habitat area shall be submitted to the City, County and/or Coastal Commission as may be applicable for specific project review. A site-specific biological survey shall accompany any specific project proposal or

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~~coastal development permit application involving development potentially affecting ESHA, as applicable, so that a determination of potential ESHA impacts and appropriate mitigation can be made.~~

SUGGESTED MODIFICATION 30:

Section 3.2.2 Water Quality, Page 3-43

Water Quality Implementation Measure 1: New park facility development shall, as applicable, include post-development phase drainage and polluted runoff control plans. These plans shall specify site design, source control and treatment control Best Management Practices (BMPs), that will be implemented to minimize post-construction polluted runoff, and shall include monitoring and maintenance provisions for identified BMPs and shall specifically address:

- Designated areas within camp facilities to provide fresh water for camp uses including drinking water, hand washing and dish washing, and areas where overspill will drain. All overspill shall be contained onsite and treated with appropriate post-development BMPs measures.
- Methods to accommodate onsite percolation and to mitigate and treat any increase in runoff from impervious surfaces, including utilizing permeable materials for surfacing wherever feasible. ~~consistent with all applicable development standards of Section 17.5.1 BMP Requirements and Implementation of the Malibu Local Implementation Plan.~~

SUGGESTED MODIFICATION 31:

Section 3.3 Hazards, Page 3-55 to 3-58

Hazards Implementation Measure 6: As part of a NOID for uses and/or improvements within any park in the Plan area, A a facility-specific Fire Protection and Emergency Evacuation Plan shall be developed, and submitted for review and approval to the reviewing body for any Coastal Act approval as well as to the appropriate Fire Agency as described below. The approved version Fire Protection and Emergency Evacuation Plan shall be implemented, with development of the approved facilities. for Ramirez Canyon Park, Escondido Canyon Park, Latigo Canyon Trailhead, Corral Canyon Park and the Conservancy-owned Malibu Bluffs. ~~The Fire Management and Emergency Evacuation Plans shall include the following provisions:~~

- All standard Parkland rules and regulations shall be enforced per existing policies of the Conservancy/MRCA:
 - Except in designated camp areas, park properties shall be closed sunset to sunrise.
 - No smoking or fires.
 - No alcoholic beverages.
 - No littering or dumping.
 - No unauthorized vehicle use.
 - No defacing or destroying property.
 - Dogs must be on a leash and cleaned up after.
 - Possession of firearms, bow and arrow prohibited.

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- Violations subject to \$500 fine and/or 6 months in County jail. Violations of posted conditions may be punishable by fines of up to \$1,000 and/or 6 months in County jail, or to the maximum extent allowed by law.
- An annual fuel modification plan for site vegetation management and tree trimming/limbing at each park property shall be developed and implemented prior to the annual fire season.
- Campsite locations shall be located within existing public use areas to ensure easy access for purposes of maintenance and patrol, and in case of emergency.
- (MM BIO-1.19 and MM BIO-10.10) No person shall make or maintain, nor aid and abet others in making or maintaining, a campfire or any other open fire in any of the park facilities covered by this Plan. The only cooking apparatus permitted shall consist of small electrical cooking appliances when permitted consistent with the terms of the approved Fire Protection and Emergency Evacuation Plan, and as indicated below. No kerosene or white gas lanterns shall be permitted.
- Campers shall be required to utilize designated cook stations (hospitality stations) provided at each approved campsite, which shall be designed of nonflammable materials and capable of being fully enclosed vertically on three sides (leaving one side open for cooking operations); a horizontal rain cover would also be provided, while allowing for cooking operations. Cold-camping apparatus such as flame-less cook-stoves and lanterns shall be required; use of any type of liquid fuel (alcohol, kerosene, unleaded gasoline, white gas, mentholated Spirit, etc), canister fuel (propane, butane, etc), wood, wax or any other type of combustible material for cooking or lighting shall be expressly prohibited. Each cook station shall be equipped with an all-weather electrical outlet. Upon check-in by a wild-fire trained camp host or ranger, campers shall be informed of the No Campfire/Cold Camp Policy and shall be offered the opportunity to check-out a dual burner electrical hot plate for cooking purposes during their stay; a nominal deposit would be required. Use of electric hot plates, grills, griddles, waffle irons, and/or similar small electrical cooking appliances brought from home would be permissible at the designated cook stations only. Upon reserving and registering for use of camp facilities, prospective campers shall be put on notice that unauthorized use of fire-related camping and cooking apparatus is specifically prohibited by the No Campfire/Cold Camp Policy, but that use of small electrical cooking appliances (as described above) is permissible. However, the use of propane cook-stoves may be allowed at designated cook stations at approved campsites if it is determined that propane cook-stoves pose no greater fire hazard risk than electric stoves pursuant to a 1-yr. study, as described below. The SMMC/MRCA, in consultation with California Department of Parks and Recreation, Los Angeles County Fire Department, and the State Fire Marshall, shall conduct a 1-yr. study and pilot project that analyzes the potential fire hazard and incidents/accidents associated with the use of propane cook-stoves versus electric cook-stoves at Camp Areas 1 and 2 of Malibu Bluffs and other public campgrounds to determine if the ban on the use of propane cook-stoves is warranted. The results of the study and pilot project shall be submitted to the Executive Director of the Coastal Commission for review and approval. If it is determined that propane cook-stoves pose no greater fire hazard risk than electric stoves, then the use of propane cook-stoves shall be allowed at all designated campsites throughout the Plan area.

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- Campers shall be notified that use of fire-related camping and cooking apparatus shall be cause for expulsion of visitors from camp facilities and violations of posted conditions may be punishable by fines up to \$1,000.00 and/or 6 months in County jail, or to the maximum extent allowed by law. Signs shall be posted at the designated cook stations informing campers of the No Campfire/Cold Camp Policy. In addition, campers shall be notified that use of the cook station electrical outlet(s) for space heaters, lighting sources, hair curling and flattening devices, blow dryers, stereos or other devices emitting audible noise would be cause for confiscation of such devices and/or expulsion of visitors from camp facilities.

...

- Ramirez Canyon Park, Escondido Canyon Park, Latigo Canyon Trailhead, Corral Canyon Park, and Malibu Bluffs Park shall be closed to all recreational use during any Red Flag Day/period as declared for the Santa Monica Mountains area by the National Weather service, a division of the National Oceanic Atmospheric Administration (NOAA), Park properties shall be posted and patrolled to inform visitors of Red Flag Day closures and notification provided that violation of the Red Flag Day closure policy may be punishable by fines up to ~~\$6,000.00~~ \$1,000 and/or 6 months in County jail, or to the maximum extent allowed by law.

...

- ~~ii.~~ A Wooden Bridge Reinforcement Plan, developed and implemented to provide for reinforcement of the wood bridge over Ramirez Canyon Creek next to Ramirez Canyon Park, shall be maintained to ensure that the bridge will safely support a 75,000 pound fire truck and thereby accommodate emergency access. The wood bridge shall be maintained in sound condition to ensure safe and adequate emergency access to the Park.
- ~~iii.~~ An Emergency Access and Emergency On-Site Parking Plan for Ramirez Canyon Park, prepared by a licensed civil engineer and approved by the appropriate Fire Agency as compliant with applicable state and county fire and life safety regulations, shall be maintained for Ramirez Canyon Park. Special events held during the fire season shall retain all guest vans, shuttles, and drivers continuously on site during the event.
- ~~iv.~~ Opportunities for additional emergency ingress/egress to and from Kanan Dume Road over Via Acero shall be explored, including the potential for feasibly obtaining easements from willing property owners or by eminent domain. ~~Construction of an additional emergency ingress/egress at Ramirez Canyon may occur consistent with all applicable policies and provisions of the LCP.~~ Development of the proposed Ramirez Canyon Park secondary emergency access alignment over Via Acero Road may be implemented if demonstrated to be feasible and necessary. This policy is not intended to limit the use of, or access to, Ramirez Canyon Park via Ramirez Canyon Road.
- ~~v.~~ The Conservancy/MRCA shall explore and pursue all options to remove any permitted or unpermitted private encroachments into the Ramirez Canyon Road 40 foot easement to achieve full access road width and clearance standards as required by the appropriate fire agency.

SUGGESTED MODIFICATION 32:

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Section 3.3 Hazards, Page 3-58

Hazards Implementation Measure 9: Opportunities for additional emergency ingress/egress to and from Kanan Dume Road over Via Acero shall be explored, including the potential for feasibly obtaining easements from willing property owners or by eminent domain. ~~Construction of an additional emergency ingress/egress at Ramirez Canyon over Via Acero may occur consistent with all applicable policies and provisions of this Plan. the City of Malibu Local Coastal Program.~~ Development of the proposed Ramirez Canyon Park secondary emergency access alignment over Via Acero Road may be implemented if demonstrated to be feasible and necessary. This policy is not intended to limit the use of, or access to, Ramirez Canyon Park via Ramirez Canyon Road.

SUGGESTED MODIFICATION 33:

Section 3.3 Hazards, Page 3-58

Hazards Implementation Measure 7: If required by LACFD, a A-Wooden Bridge Reinforcement/Replacement Plan, developed and implemented to provide for reinforcement and/or replacement (consistent with LACFD requirements) of the existing wood bridge over Ramirez Canyon Creek next to Ramirez Canyon Park, shall be maintained to ensure that the bridge will safely support a 75,000 pound 25-ton fire truck and thereby accommodate emergency access. The wood bridge shall be maintained in sound condition to ensure safe and adequate emergency access to the Park.

SUGGESTED MODIFICATION 34:

Section 3.4.1 Land Use, Page 3-60

Land Use Policy 1: Specific parkland, recreation, transportation, and trail improvement projects included in consistent with the Malibu Parks Public Access Enhancement Plan Overlay and this Plan are intended to: ~~can be approved and implemented pursuant to notice of impending development (NOID) review procedures to~~ 1) develop public access and recreational facility improvements, including support facilities, needed to meet growing visitation and demands for recreational opportunities in the Santa Monica Mountains and Malibu area, 2) address potential impacts to coastal resources associated with recreational facility development, 3) provide alternative transportation opportunities to facilitate public access, 4) implement and maintain specialized public program uses intended to enhance and diversify access and recreation opportunities, and 5) balance the needs and concerns of private residents adjacent to public recreational lands with the need to promote and enhance public access and recreation opportunities in the Coastal Zone for all visitors.

SUGGESTED MODIFICATION 35:

Section 3.4.1 Land Use, Page 3-60

Land Use Policy 2: ~~All new public access and recreation facilities shall be developed consistent with the established OS land use and zoning designation and provisions of the Malibu Parks Public Access Enhancement Plan Overlay, and according to applicable land use designations of Los Angeles County lands subject to the Malibu/Santa Monica Mountains Land Use Plan.~~ Permitted park uses consist of recreation, research and education, nature

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observation, and a range of critical support facilities, developed and operated pursuant to this Plan. Existing and proposed support facilities are defined as those facilities deemed necessary to support the primary permitted land use, public access and recreation, research and education, and nature observation. The type of support facilities addressed at each park facility shall be based on the level and complexity of public uses and specialized programs offered at each park area. Ramirez Canyon Park, given its unique character, limited accessibility to the public and specialized programs, shall be permitted the administrative and support facilities necessary to maintain access programs, daily operations and maintenance of the various park and recreation programs addressed in the ~~Malibu Parks Public Access Enhancement Plan Overlay~~ and this Plan.

SUGGESTED MODIFICATION 36:

Section 3.4.1 Land Use, Page 3-61

Land Use Policy 3: Development of public access and recreation improvements, and specialized public parkland programs, shall be subject to all implementation measures identified in the ~~Malibu Parks Public Access Enhancement Plan Overlay~~ and this Plan, as applicable. Public access and recreation improvements, and specialized public parkland programs, shall be developed and maintained to minimize potential land use conflicts with adjacent residential neighborhoods.

SUGGESTED MODIFICATION 37:

Section 3.4.1 Land Use, Page 3-65

Land Use Implementation Measure 16: ~~Specialized programs permitted at Ramirez Canyon Park and associated support facilities would consist of the following uses and be limited by the following restrictions:~~

- ~~Administrative offices for the Conservancy and Mountains Recreation & Conservation Authority (MRCA).~~
- ~~Ranger/maintenance supervisor residence utilized by MRCA staff charged with security, site management, and public safety duties.~~
- ~~Public improvements for the riparian area interpretive trail and picnic facilities designed specifically to provide facilities and amenities required for the safe use of the trail by physically challenged visitors in compliance with Americans with Disabilities Act (ADA) requirements, including trails, picnic facilities, drinking fountains, restrooms, and parking areas.~~
- ~~Use of the Peach House, Barn, and Art Deco facility for small group gatherings and tours for up to 40 participants each, and to greet guests or as a component of site tours provided the Conservancy/MRCA has secured all other necessary approvals under State law for such use of these facilities.~~
- ~~Public Outreach, Events, Gatherings, Tours, And Workshops~~
 - ~~Public Outreach Programs~~
 - ~~Year Round, Permitted 7 Days/Week~~
 - ~~Max 40 Participants~~

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- 8:00 a.m.— Dusk
- ~~Minimum 10 Outreach Events Conducted Per Month at Ramirez Canyon Park or Corral Canyon Park, 5 of which shall be conducted at Ramirez Canyon Park (except when precluded by public safety concerns)~~
- ~~Tours And/Or Small Gatherings~~
 - ~~Year Round, 12 Tours or Gatherings Permitted/Month~~
 - ~~Max 40 Participants~~
 - ~~8:00 a.m.— Dusk~~
- ~~Special Events (gatherings of guests numbering more than 40)~~
 - ~~March—October, 16 Events Permitted/Year, 1 Event Permitted/Week~~
 - ~~Maximum 200 Participants (April 1 through July 31)~~
 - ~~Maximum 150 Participants (March 1 through March 31 and August 1 through October 31)~~
 - ~~8:00 a.m.— 9:00 p.m. Sunday-Thursday, and 8:00 a.m. to 10:00 p.m. Friday and Saturday, One Additional Hour is Allotted for Personnel Clean-Up and Securing the Facility.~~
- ~~Day-use picnic areas designed specifically to provide park amenities to accommodate disabled visitors and their families by reservation. The accessible day-use picnic areas shall be located in level, previously disturbed areas so as not to adversely impact sensitive habitat, but shall be located in proximity to natural areas to provide association with natural resources to the maximum extent feasible.~~
- ~~ADA accessible camp facility designed specifically for use by disabled visitors and their families, available by reservation.~~
- ~~Hike-in camp facility, available by reservation only.~~

Ramirez Canyon Park uses and improvements shall be implemented in phases, with the following limitations:

A. Ramirez Canyon Park Phase I Uses and Improvements

Phase 1 improvements and uses for Ramirez Canyon Park continues existing baseline uses at the park with only minor new improvements, including retrofit of the Ranger/Maintenance Supervisor Residence as a fire shelter, and passive recreation-related improvements. If required by CALFIRE, miscellaneous Phase 1 improvements to the Barwood, Peach House, Art Deco, and Barn structures may be implemented, focusing on providing building ignition resistance and prevention of ember intrusion. Each structure would be retrofitted with monitored interior sprinklers for fire suppression and new hydrants would be installed at the park. Existing administrative office uses and current small events (e.g., public outreach, meetings, etc.) would continue under Phase 1. Road improvements along Ramirez Canyon Road and Delaplane Road would occur under Phase 1, if required by the appropriate fire agency

Phase 1 would also include installation of picnic tables that would be placed in several locations within the park (no grading), and a two-stall, self-contained restroom would be installed at the northern terminus of trail alignment 5a (Figure 8) to replace the existing portable restroom. No

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improvements would be made to existing parking areas located within the Ramirez Canyon Park valley floor (a total of 54 spaces). The Ramirez Creek Restoration/Enhancement plan would be implemented as part of Phase 1.

Phase 1 would also include construction of trail alignment 1a (and the Kanan Spur Trail) that would extend from Kanan Dume Road to a connection at the Ramirez Canyon Park valley-floor to trail alignment 2a3 (Figure 8); and the associated 14-space parking areas along Kanan Dume would be constructed at this time. A short trail spur from the southerly portion of the park (trail 2a7) would be constructed to connect to the proposed Coastal Slope Trail (trail 2a3). During Phase 1, gates and fencing would be installed in the Park to direct trail users to stay on the trails, with signage notifying trail users to not enter facilities, including on-site buildings/ offices at the Park.

Phase 1 specialized programs and use limitations for Ramirez Canyon Park include the following:

- All Ramirez Canyon Park uses, including administrative and operational uses, public outreach, events, gatherings, tours, and workshops, etc. shall be limited in size, duration and occurrence to comply with the proposed maximum of 80 total trips/day (including both inbound and outbound trips) on Ramirez Canyon Road.
- Public outreach and education activities are priority uses and shall be accommodated first within the maximum allowed 80 trips/day for Ramirez Canyon Park uses.
- Events, tours, or other special functions permitted at Ramirez Canyon shall be cancelled when any National Weather Service red-flag warning for extreme weather, fire and/or flooding warning is issued. Written warnings of such policy shall be provided to prospective sponsors prior to contracting for park use.
- Amplified music shall only be provided in the areas located immediately in front of and behind the Barn facility and at no time shall amplified music be audible beyond the property boundaries adjacent to residential development. In addition, event monitors on duty during such events shall check sound levels hourly at the site boundaries nearest adjacent residential development and shall immediately ensure volume reduction to achieve this standard should it be exceeded. Amplified music shall not be allowed anywhere on the subject site after 8:00 p.m. Sunday through Thursday evenings or after 10:00 p.m. on Friday or Saturday evenings. Special event sponsors shall be provided written notice of these amplified music restrictions prior to entering into a contract for rental of the Barn facility.
- Special programs held during the fire season shall retain all guest vans, shuttles, and drivers continuously on site during the event. Additional vehicles shall be provided, as needed, onsite at Ramirez Canyon Park so that there would be enough vehicular capacity to relocate all persons on site for any event in one trip out.
- Specialized programs permitted at Ramirez Canyon Park and associated support facilities shall consist of the following uses and be limited by the following restrictions:
 - Administrative offices for the Conservancy and MRCA, with an on-site office/ administration population not exceeding 15 staff persons.
 - Ranger/maintenance supervisor residence utilized by MRCA staff charged with security, site management, and public safety duties.
 - Public improvements for the riparian area interpretive trail and picnic facilities designed specifically to provide facilities and amenities required for the safe use of

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- the trail by physically challenged visitors in compliance with Americans with Disabilities Act (ADA) requirements, including trails, picnic facilities, drinking fountains, and restrooms.
- Use of the Peach House and Barn facility for small group gatherings and tours for up to 40 participants each, and to a limited extent the Art Deco facility may be used to greet guests or as a component of site tours, but not as a primary site for group functions.
 - Continuation of existing small events (e.g., public outreach, meetings, etc.)
 - Year-Round, Permitted 2 days/Week
 - Maximum 40 Participants (with an additional 20 staff on-site)
 - Conservancy/MRCA employee training and workshops
 - Year-round, permitted twice per month
 - Max 60 persons on-site
 - 8am-dusk
 - Placement of picnic tables at the park.
- Implementation of the Ramirez Creek Restoration/Enhancement Plan pursuant to ESHA Implementation Measure 18 of this Plan.
 - A Transportation and Parking Management Plan is proposed to manage traffic trips on Ramirez Canyon Road and includes the following elements:
 - Agreements shall be secured and maintained between the Conservancy/ MRCA and willing providers of offsite parking resources to accommodate any necessary additional parking demand associated with the authorized Phase 1 uses of the park without displacing the current parking needs of the provider.
 - No off-site public coastal access parking, including the Winding Way Trailhead parking lot at Escondido Canyon Park, shall be utilized to satisfy the off-site parking requirements associated with Ramirez Canyon Park use.
 - Daily vehicle trips associated with all authorized uses of Ramirez Canyon Park are restricted to a maximum of 80 trips per day (40 round trips).
 - Signs shall be provided and maintained at the entrance gate to Ramirez Canyon Park forbidding horn honking except in case of emergency.
 - Vans and shuttles shall minimize traffic trips on Ramirez Canyon Road by traveling with maximum passenger capability and in convoys, whenever feasible.
 - An Event Monitoring Program is proposed and includes monitoring reports to be submitted to the Executive Director of the Coastal Commission annually. The monitoring reports shall include a summary of the number and kind of events, tours, small gatherings, and outreach programs conducted at Ramirez Canyon Park during the annual reporting period, distinguishing revenue-generating and non-revenue generating events, activities, tours, and outreach programs, and specifying the dates, vehicle trip counts, and event sponsor or beneficiary as applicable, for each.

B. Unpermitted Phase 1 Uses and Improvements

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Within 180 days of final PWP certification, a NOID shall be submitted for both after-the-fact authorization of the unpermitted Phase 1 Ramirez Park uses, as well as for historic, unpermitted impacts to Ramirez Creek riparian habitat. Within 180 days of final PWP certification, the Conservancy/MRCA shall ensure that a detailed Final Ramirez Creek Restoration Plan that is consistent with this Plan and the "Biological Concept Mitigation/Restoration Plan Memorandum" by Dudek included in Appendix B is prepared and submitted to the Commission as part of a NOID. Once the NOID is approved, the Conservancy/MRCA shall implement the plan consistent with any conditions imposed upon the NOID. The Final Plan may be implemented in phases, but at a minimum, stream bank restoration of lower Ramirez Creek as shown on Sheet 55 of Appendix A must be installed within one (1) year of the NOID approval, and the remainder of the proposed Ramirez Creek restoration and associated mitigation must be installed within five (5) years of the NOID approval.

"Final PWP certification" means not only that the approvals/certifications of the PWP, the Environmental Impact Report for the PWP, and the Malibu Local Coastal Program Amendment for the Malibu Parks Public Access Enhancement Plan Overlay (MAL-MAJ-1-08) (collectively referred to as the "Planning Approvals") are final and effective, but also that any potential administrative and judicial challenges to any of the Planning Approvals either did not occur within the allowable timeframe (so that they are time barred) or proceeded to completion, including through any available appeals or the like, and did not result in the overturning, invalidation, or remand of any of the Planning Approvals.

C. Ramirez Canyon Park Phase 2 Uses and Improvements

Phase 2 includes all of the Phase 1 programs and uses and also includes structural retrofits to the Peach House to be used as a fire shelter, two new accessible campsites, new parking improvements, new improved accessible day use areas, new restrooms, as well as large special events (sixteen (16) 200-person events per year). If required by the appropriate fire agency, road improvements to Via Acero Road for secondary emergency access would be associated with the implementation of Phase 2 improvements.

Phase 2 improvements and uses for Ramirez Canyon Park would continue all the park uses and limitations included in Phase 1, and would include additional specialized programs, park improvements and uses and associated use limitations as follows:

- Special programs/events held during the fire season shall retain all guest vans, shuttles, and drivers continuously on site during the event. Additional vehicles shall be provided, as needed, onsite at Ramirez Canyon Park so that there would be enough vehicular capacity to relocate all persons on site for any event in one trip out.
- Net proceeds or \$1,000 per large event, whichever is greater, generated by special events held at Ramirez Canyon Park shall be used to establish and maintain a fund for purposes of funding access and recreational improvements and opportunities for visitors with diverse abilities, disadvantaged youth, or other underserved groups. The fund shall specifically serve to implement a program designed for disadvantaged youth and dedicated to teaching first-time campers proper use of camping equipment, environmental awareness and outdoor leadership skills. The camp program shall include all necessary transportation, food and equipment, with staffing provided by professional naturalist educators who are trained in first aid, youth leadership and outdoor education. See description of special event uses below.
- Administrative offices for the Conservancy and MRCA.
- Public Outreach, Events, Gatherings, Tours, And Workshops

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- Public Outreach Programs
 - Year-Round, Permitted 7 Days/Week
 - Maximum 40 Participants (with an additional 20 staff on-site)
 - 8:00 AM – Dusk
 - Minimum 10 Outreach Events Conducted Per Month at Ramirez Canyon Park, Escondido Canyon Park or Corral Canyon Park, 5 of which shall be conducted at Ramirez Canyon park (except when precluded by public safety concerns)
- Tours And/Or Small Gatherings
 - Year-Round, 12 Tours or Gatherings Permitted/Month
 - Maximum 40 Participants (with an additional 20 staff on-site)
 - 8:00 AM – Dusk
- Special Events (gatherings of participants/ guests numbering more than 40)
 - March – October, 16 Events Permitted/Year, 1 Event Permitted/Week
 - Maximum 200 Participants (April 1 through July 31) (with additional 50 staff and employees of service providers)
 - Maximum 150 Participants (March 1 through March 31 and August 1 through October 31) (with additional 50 staff and employees of service providers)
 - 8:00 AM - 9:00 PM Sunday-Thursday, and 8:00 AM to 10:00 PM Friday and Saturday, One Additional Hour is Allotted for Personnel Clean-Up and Securing the Facility.
- Additional day-use picnic areas designed specifically to provide park amenities to accommodate disabled visitors and their families by reservation. The accessible day-use picnic areas shall be located in level, previously disturbed areas so as not to adversely impact sensitive habitat, but shall be located in proximity to natural areas to provide association with natural resources to the maximum extent feasible.
- ADA accessible camp facility designed specifically for use by visitors with disabilities and their families, available by reservation.

In addition to the specific parking, camping, and support facility improvements for each particular park property included in the Plan, the phased improvements for Ramirez Canyon Park are identified in Table 3, Malibu Parks Public Access Enhancement Plan-Public Works Plan Facility Improvement Summary Table.

SUGGESTED MODIFICATION 38:

3.5 Public Works Plan Scope of Improvements

Camp Sites and Parking, last paragraph, Page 3-67

Public parking improvements are proposed along Kanan Dume Road (to support access to Ramirez Canyon Park), near the entrance in Ramirez Canyon Park (improvement to an existing parking lot), at the Latigo Trailhead property, Corral Canyon Park (improvement to existing parking lot), and Malibu Bluffs. Parking improvements generally consist of asphalt concrete parking lots (except parking improvements at Corral Canyon Park which would consist of

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decomposed granite) and include standard and accessible parking spaces and bike racks. Additional permeable materials in parking lot areas would be utilized where feasible and consistent with site-specific geotechnical recommendations. Parking improvements are identified in Table 3. The proposed Plan would provide a total of ~~169~~ 157 (existing + proposed) parking spaces within the five parks. There would be drop boxes/iron rangers for collection of parking fees at most parking lots.

SUGGESTED MODIFICATION 39:

**3.5 Public Works Plan Scope of Improvements
Pedestrian and Vehicle Bridges, Paragraph 1, Page 3-68**

The proposed Plan includes construction of twelve (12) potential pedestrian trail bridges; one at Ramirez Canyon Creek along trail alignment 1a from Kanan Dume to Ramirez Canyon Park, three at Escondido Creek along trail alignment 4 in the northern portion Escondido Canyon Park, four at Corral Creek along the Beach to Backbone Trail (one along trail alignment 11a, one along trail alignment 14, and two along trail alignment 15), and four within the Malibu Bluffs Conservancy Property. Final engineering design may allow for the construction of additional pedestrian bridges to minimize grading and/or creek encroachments. If required by the appropriate fire agency(ies), one vehicular bridge on Ramirez Canyon Road would be replaced and upgraded to a travel width of 20-ft as part of the Ramirez Canyon Road widening plan. Within Ramirez Canyon Park, ~~an the existing Arizona creek-crossing (if required by the appropriate fire agency(ies) to be widened to a travel width of 20 ft) would be replaced with a span bridge, or if permissible to the Coastal Commission, the existing facility would~~ may be widened to a travel width of 20 ft, as necessary to accommodate any safety requirements of appropriate fire agency(ies). In the long-term, the Conservancy/MRCA should explore opportunities to replace the existing Arizona Creek-crossing with a span bridge.

SUGGESTED MODIFICATION 40:

**3.5 Public Works Plan Scope of Improvements
Fire Safety, Cook Stations (Hospitality Stations), second paragraph, Page 3-69**

Each cook station would be equipped with an all-weather electrical outlet. Upon check-in by a wild-fire trained camp host or ranger, campers would be informed of the No Campfire/Cold Camp Policy and would be offered the opportunity to check-out a dual burner electrical hot plate for cooking purposes during their stay; a nominal deposit would be required. Use of electric hot plates, grills, griddles, waffle irons, and/or similar small electrical cooking appliances brought from home would be permissible (subject to the discretion of MRCA Rangers, camp hosts, and/or staff) at the designated cook stations only.

SUGGESTED MODIFICATION 41:

**3.5 Public Works Plan Scope of Improvements
Fire Safety, Emergency Fire Shelters, Page 3-70**

In order to address fire safety concerns associated with wildfire scenarios that would not allow enough time to safely evacuate the Plan area, the FPP specifies that the Ramirez Canyon Park shall have an emergency fire shelter(s) capable of accommodating the largest assembly of persons on-site allowed under the Plan (Phase 1: 60 persons; Phase 2: 250 persons). ~~The Peach Building and the Ranger/Maintenance Supervisor Residence (Phase 1) and the Peach~~

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House (Phase 2) would be remodeled and retrofitted to provide a safe and temporary “last resort” on-site sheltering should relocation from the Park be determined to be more dangerous than remaining on-site.

~~For all other park sites, emergency fire shelters would be optional and are identified on the project plans. The shelters are not considered a crucial component of fire protection planning at the other parks due to the location of the camping areas’ relative proximity to highways and/or roadways, as well as in consideration of the other components of the FPP. These shelters are considered optional and would only be installed if required and approved by the Coastal Commission, CAL FIRE (or its representative), and/or LACFD; all Conservancy-owned properties are under the fire jurisdiction of CAL FIRE, while MRCA-owned properties are under the fire jurisdiction of LACFD.~~

The optional emergency fire shelters are proposed at the following locations:

- ~~West of Murphy Way Road, trail 2a6~~
- ~~Corral Canyon Park, east of Corral Canyon Road, trail 13b~~
- ~~Corral Canyon Park, Camp Area 1~~
- ~~Malibu Bluffs, Camp Area 3~~
- ~~Malibu Bluffs, Camp Area 4 (2 total)~~

SUGGESTED MODIFICATION 42:

3.5.2 Trail Improvements

Dry Canyon Connector Trail/Solstice Canyon Trail and Portion of Corral Canyon East Trail, third paragraph, Page 3-76

...

The trail would then continue east of Corral Canyon Road. This proposed trail alignment (11a) descends into Corral Canyon to where a natural, informal stream crossing exists and provides access across the creek to a burn-out site (proposed for ~~campsite~~ day-use improvements, discussed above). This section of the trail connection would require trail improvements within the riparian corridor of the stream. From this point, the public gains access to the existing Corral Canyon loop trail (Trail Segment 11e, discussed below; a portion of which is considered part of the Coastal Slope Trail), the Park’s trailhead and parking facilities, and seasonal beach access to Dan Blocker Beach.

...

Beach to Backbone Trail: Corral East Trail (portion), Corral Easement Trail, Corral North Link 1, and Corral North Trail (Corral Canyon Park), second paragraph, Page 3-76

...

From the beach, people currently cross PCH at grade, or they utilize the existing undercrossing at PCH to reach the existing Corral Canyon loop trail in Corral Canyon Park. A traffic light is also located at the intersection of Corral Canyon Road and PCH. The existing Corral Canyon Loop Trail is further divided into the Corral Camp Trail and the Corral Camp North Trail (portion of the Coastal Slope Trail). These existing trails in Corral Canyon Park would lead to ~~new~~ the proposed campsites and day-use/picnic areas (~~two separate camp areas~~). A portion of the

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Corral Camp Trail would be improved to make it accessible for persons with disabilities and would lead to Camp Area 1.

...

SUGGESTED MODIFICATION 43:

Beginning Page 3-78

3.5.3 Fire Protection and Emergency Evacuation Plan

The Proposed Plan includes a Fire Protection Plan (which also addresses emergency evacuation) that includes site specific risk assessments for each park property included in the Plan and, at a minimum, the following fire protection and emergency evacuation measures, unless otherwise indicated pursuant to Hazards Implementation Measure 6:

Bullet point No. 1, Page 3-78

All standard Parkland rules and regulations shall be enforced per existing policies of the Conservancy/MRCA:

- Except in designated camp areas, park properties shall be closed sunset to sunrise.
- No smoking or fires.
- No alcoholic beverages.
- No littering or dumping.
- No unauthorized vehicle use.
- No defacing or destroying property.
- Dogs must be on a leash and cleaned up after.
- Possession of firearms, bow and arrow prohibited.
- Violations subject to \$500 fine and/or 6 months in County jail. Violations of posted conditions may be punishable by fines of up to \$1,000 and/or 6 months in County jail, or to the maximum extent allowed by law.

...

Last sentences of bullet point No. 5 on Page 3-78 to 3-79

... Campers shall be notified that use of fire-related camping and cooking apparatus shall be cause for expulsion of visitors from camp facilities and violations of posted conditions may be punishable by fines up to \$1,000.00 and/or 6 months in County jail, or to the maximum extent allowed by law. Signs shall be posted at the designated cook stations informing campers of the No Campfire/Cold Camp Policy. In addition, campers shall be notified that use of the cook station electrical outlet(s) for space heaters, lighting sources, hair curling and flattening devices, blow dryers, stereos or other devices emitting audible noise would be cause for confiscation of such devices and/or expulsion of visitors from camp facilities.

...

Bullet point No. 7 on Page 3-79

Ramirez Canyon Park, Escondido Canyon Park, Latigo Canyon Trailhead, Corral Canyon Park, and Malibu Bluffs Park shall be closed to all recreational use during any Red Flag Day/period as declared for the Santa Monica Mountains area by the National Weather service, a division of the National Oceanic Atmospheric Administration (NOAA), Park properties shall be posted and patrolled to inform visitors of Red Flag Day closures and notification provided that violation of the Red Flag Day closure policy may be punishable by fines up to ~~\$6,000.00~~ \$1,000 and/or 6 months in County jail, or to the maximum extent allowed by law.

...

Last sentence of bullet point No. 9 on Page 3-79

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... ~~Every Camp Host shall be designated and trained as a “public officer” under the provisions of the Penal Code. As public officers, Camp Hosts and/or Park Rangers shall enforce all applicable ordinances and regulations, including the “cold-camping” provisions cited within the PWP. Every Camp Host shall be designated and trained as a uniformed public officer pursuant to the provisions of the Public Resources Code. As such Camp Hosts shall enforce all applicable misdemeanors or infractions, including the “cold-camping” provisions cited within the PWP, pursuant to the MRCA ordinance and other provisions of law. MRCA park rangers are sworn California Peace Officers and can enforce felony as well as misdemeanor and infraction violations.~~

...

Bullet point No. 13 on Page 3-80

If required by LACFD, a A-Wooden Bridge Reinforcement/Replacement Plan, developed and implemented to provide for reinforcement and/or replacement (consistent with LACFD requirements) of the existing wood bridge over Ramirez Canyon Creek next to Ramirez Canyon Park, shall be maintained to ensure that the bridge will safely support a 75,000 pound fire truck and thereby accommodate emergency access. The wood bridge shall be maintained in sound condition to ensure safe and adequate emergency access to the Park.

...

Bullet point No. 15 on Page 3-80

Opportunities for additional emergency ingress/egress to and from Kanan Dume Road over Via Acero shall be explored, including the potential for feasibly obtaining easements from willing property owners or by eminent domain. Construction of an additional emergency ingress/egress at Ramirez Canyon may occur consistent with all applicable policies and provisions of the LCP. Development of the proposed Ramirez Canyon Park secondary emergency access alignment over Via Acero Road may be implemented if demonstrated to be feasible and necessary. This policy is not intended to limit the use of, or access to, Ramirez Canyon Park via Ramirez Canyon Road.

SUGGESTED MODIFICATION 44:

3.5.3 Project Phasing, end of paragraph 3, Page 3-81

...The Ramirez Creek Restoration/Enhancement plan would be implemented as part of Phase 1. The Conservancy/MRCA will implement a Ramirez Creek Restoration Plan, that is consistent with the “Biological Concept Mitigation/Restoration Plan Memorandum” prepared by Dudek (Appendix B) and Sheets 53-64 of the PWP Concept Plans prepared by Penfield & Smith (Appendix A). The creek restoration/ enhancement plan includes removing existing gabions and installing pervious boulder berms and/or log deflection structures throughout the creek to control stream degradation; creating areas of overbank enhancement in two areas (by the existing tennis court and at the southerly portion of the park) by removing artificial creek wall linings, grading back the slopes, constructing rock toe protection, installing retaining walls, and planting native plants; removing existing concrete and artificial hard surfaces in the creek; and planting of native plant species and removing non-native plants throughout the creek and implementing corresponding best management practices. The creek enhancement area would also provide for educational displays associated with restoration and enhancement efforts of the proposed creek restoration program.

...

SUGGESTED MODIFICATION 45:

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3.5.3 Project Phasing, bullet point at top of Page 3-82

- Specialized programs permitted at Ramirez Canyon Park and associated support facilities shall consist of the following uses and be limited by the following restrictions:
 - Administrative offices for the Conservancy and MRCA, with an on-site office/administration population not exceeding 15 staff persons.
 - Ranger/maintenance supervisor residence utilized by MRCA staff charged with security, site management, and public safety duties.
 - Public improvements for the riparian area interpretive trail and picnic facilities designed specifically to provide facilities and amenities required for the safe use of the trail by physically challenged visitors in compliance with Americans with Disabilities Act (ADA) requirements, including trails, picnic facilities, drinking fountains, and restrooms.
 - Use of the Peach House and Barn facility for small group gatherings and tours for up to 40 participants each, and to a limited extent the Art Deco facility may be used to greet guests or as a component of site tours, but not as a primary site for group functions.
 - Continuation of existing small events (e.g., public outreach, meetings, etc.)
 - Year-Round, Permitted 2 days/Week
 - Maximum 40 Participants (with an additional 20 staff on-site)
 - Conservancy/MRCA employee training and workshops (Phase 1)
 - Year-round, permitted twice per month
 - Max 60 persons on-site
 - 8am-dusk
 - Placement of picnic tables at the park.

SUGGESTED MODIFICATION 46:

4.1.5 Development Excluded from NOID Procedures, Page 4-3

The categories of development and uses identified in this section are excluded from the requirements of Sections 4.1.1-4.1.4.

1. Installation, testing, and placement in service or the replacement of, any necessary utility connection between an existing service facility and any development authorized pursuant to this Section, including utility hook up activities described in the document entitled "Repair, Maintenance and Utility Hook Up Exclusions from Permit Requirements," adopted by the Commission on September 5, 1978, provided that any adverse impacts on coastal resources, including scenic resources, have been mitigated.
2. Repair or maintenance activities that do not result in an addition to, or enlargement or expansion of, the object of those repair and maintenance activities, including those specifically described in the document entitled "Repair, Maintenance and Utility Hook-up Exclusions from Permit Requirements," adopted by the Commission on September 5, 1978, provided the activity does not include:

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- a. Any method of repair or maintenance of a seawall, revetment, bluff retaining wall, breakwater, groin, culvert, outfall, or similar shoreline work that involves substantial alteration of the foundation of the structure being repaired or maintained; placement of rip-rap or other solid material on a beach or in coastal waters, streams, estuaries, or wetlands, or on a shoreline protective work; replacement of 20 percent or more of the materials of an existing structure with materials of a different kind; or the presence of mechanized construction equipment or construction materials on any sand area, bluff, or environmentally sensitive habitat area, or within 20 feet of coastal waters or streams.
 - b. Any repair or maintenance to facilities, structures, or work located in an environmentally sensitive habitat area, any sand area, within 50 feet of the edge of a coastal bluff or environmentally sensitive habitat area, or within 20 feet of coastal waters or streams, that includes: (a) the placement or removal, whether temporary or permanent, of rip-rap, rocks, sand, other beach materials, or any other form of solid materials; and/or (b) the presence, whether temporary or permanent, of mechanized equipment or construction materials.
 - c. Any routine maintenance dredging or disposal of dredge materials that involves the dredging of 100,000 cubic yards or more within a 12-month period; the placement of dredged spoils of any quantity within an environmentally sensitive habitat area, on any sand area, within 50 feet of the edge of a coastal bluff or environmentally sensitive habitat area, or within 20 feet of coastal waters or streams; or the removal, sale, or disposal of dredged spoils of any quantity that would be suitable for beach nourishment in an area the Commission has declared by resolution to have a critically short sand supply that must be maintained for protection of structures, coastal access or public recreational use.
 - d. For activities described in the "Repair, Maintenance and Utility Hook-up Exclusions from Permit Requirements" referenced in this subsection, above, any activity that will have a risk of substantial adverse impact on public access, environmentally sensitive habitat area, wetlands, or public views to the ocean.
3. ~~Development authorized by a coastal development permit issued by the Commission prior to certification of this PWP.~~
 4. ~~Funding, operations and maintenance activities described in Section 4.5.~~

SUGGESTED MODIFICATION 47:

4.2 Amendment of Public Works Plan Projects, Page 4-4

4.2 Amendment of Public Works Plan Projects

~~Authorization for development that has been deemed consistent with the PWP by the Conservancy/MRCA and the Commission may be subsequently amended as necessary according to the procedures set forth in California Code of Regulations, Title 14 Section 13365 Amendment of Public Works Plan. Development in the Plan area that requires amendment of a pre-PWP certification Commission action, and that is subject to coastal development requirements, shall be pursued through the appropriate authority having jurisdiction over such coastal development permit, unless the director or project manager and the Commission determine that review of the amended development under PWP procedures is more appropriate.~~

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Pursuant to California Code of Regulations, Title 14, Sections 13365, an application for amendment to the certified PWP shall be submitted to the Coastal Commission and shall contain information which meets the requirements for submittal of public works plans in California Code of Regulations, Title 14, Sections 13353, 13354, and 13366.

SUGGESTED MODIFICATION 48:

4.3 Emergency Authorizations, Page 4-5

~~Definition of Emergency. For the purpose of this section the term “emergency” means: A sudden unexpected occurrence demanding immediate action to prevent or mitigate loss or damage to life, health, property or essential public services.~~

~~In accordance with Coastal Act Section 30611 of the Coastal Act, where immediate action by the Conservancy/MRCA is required to protect life and public property within the Plan area from imminent danger or to restore, repair, or maintain public works, utilities, or services destroyed, damaged, or interrupted by natural disaster or other emergency, the requirement for obtaining an emergency permit may be waived upon notification of the executive director of the Coastal Commission of the type and location of the work within three days of the disaster or discovery of the danger, whichever occurs first. Nothing in this section authorizes permanent erection of structures valued at more than twenty-five thousand dollars (\$25,000), in accordance with Coastal Act Section 30611 of the Coastal Act; provided that the Conservancy/MRCA shall comply with the requirements of Coastal Act Section 30611 and California Code of Regulations, Title 14, Sections 13136-13144.~~

SUGGESTED MODIFICATION 49:

The biological resource maps of the EIR Appendix MRA-8, and included as Exhibit 6 of this staff report, shall be included as Figure 10 in PWP to serve as baseline biological mapping.

SUGGESTED MODIFICATION 50:

The following PWP appendices changes shall be made:

List of Appendices

- A California Coastal Commission Staff Report – City of Malibu LCP Amendment Overlay PWP Concept Plans, prepared by Penfield & Smith, dated August 25, 2010
- B Policy Consistency Analysis Biological Concept Mitigation/Restoration Plan Memorandum by Dudek, dated July 26, 2010

SUGGESTED MODIFICATION 51:

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The following change shall be made to the Biological Concept Mitigation/Restoration Plan Memorandum by Dudek, dated July 26, 2010, that shall be included as Appendix B of the PWP pursuant to Suggested Modification 50 above:

Delete laurel sumac (Malosma laurina) from the Native Bunchgrass Grasslands Plant Palette of Table 8.

SUGGESTED MODIFICATION 52:

The following changes shall be made to the PWP Concept Plan Set:

- *PWP Concept Plan Sheets 6, 55, and 56 shall be revised to replace reference of “repair/maintain” with “widen”.*
- *PWP Concept Plan Sheets 10, 19, 25, 27, 29, 32, and 33 shall be revised to delete all optional emergency fire shelters.*

SUGGESTED MODIFICATION 53:

The following changes to the Tables of the PWP shall be made:

- *Table 2 (Permitted Uses) on Pages 3-13 through 3-19 shall be omitted, with remaining Tables re-numbered accordingly.*
- *The following corrections shall be made to Table 3 (Facility Improvements Summary) and Table 4 (Trail Improvements Summary) on Pages 3-85 through 3-92:*

(See next page)

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TABLE 3
Malibu Parks Public Access Enhancement Plan-Public Works Plan Facility Improvements Summary¹

Facility Improvement	Quantity (maximum)	Grading (maximum cy)	Footprint (maximum sf/lf)	Height (maximum) as applicable	Plans Reference ² (sheet no.)		
RAMIREZ CANYON: PHASE 1							
Area 1							
Parking	Existing parking area to be used	960 cy cut 95 cy fill (total Phase 1 Site-wide, not incl. Parking Areas or Access Roads)	No change	No change	Penfield & Smith 5 & 6 of 63		
Day Use-Picnic Areas	4 (6 picnic tables)		N/A	at-grade			
Water Tanks	Existing tanks to be used		No change	No change			
Area 2							
Day Use-Picnic Areas	3 (3 picnic tables)	290 lf (retaining walls)	N/A	at-grade	Penfield & Smith 5 & 7 of 63		
Restrooms	1 double		380 sf	12 ft			
Water Tanks	Existing tanks to be used		No change	No change			
Kanan Dume Road Parking Area 1							
Parking	5 (1 ADA)	612 cy cut 91 cy fill 326 lf (retaining walls)	7,500 sf	at-grade	Penfield & Smith 4 & 8 of 63		
Kanan Dume Road Parking Area 2							
Parking	4 (1 ADA)		5,472 sf	at-grade			
Kanan Dume Road Parking Area 3							
Parking	5 (0 ADA)	7,056 sf	at-grade				
Access Road Improvements							
Ramirez Canyon Road & Delaplane Road Widening/Bridge	3,473 lf (road)	500 cy import	11,391 sf	at-grade (road) 5 ft handrails (bridge)	Penfield & Smith 39-44 & 50 of 63		
Widening of Roads/Driveways Within Ramirez Canyon Park	n/a	n/a	337 lf	n/a	51a, 52a, 55, and 56 of 63		
Other Site-wide Improvements							
Camp Host Site Ranger/Maintenance Supervisor Residence	1 existing, yr-round ranger's residence	960 cy cut 95 cy fill (total Phase 1 Site-wide, not incl. Parking Areas or	No change	No change	Penfield & Smith 5 of 63		

1 Some of the fire protection measures (e.g., fire shelters, road widening, new hydrants, etc.) would be implemented if, and when, required by the appropriate fire agency(ies) and other agencies.

2 See Appendix A (PWP Concept Plans) TM 3, Modified Redesign Alternative Civil Plans within the Final EIR.

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Facility Improvement	Quantity (maximum)	Grading (maximum cy)	Footprint (maximum sf/lf)	Height (maximum) as applicable	Plans Reference ² (sheet no.)
		Access Roads)			
Emergency Fire Shelters	2 1 total: Peach Building/ Camp Host Site <u>Ranger/Maintenance Supervisor Residence</u> retrofitted, if required & 1 optional, west of Murphy Way on Trail 2A6	960 cy cut 95 cy fill (total Phase 1 Site-wide, not incl. Parking Areas or Access Roads)	192 sf	11 ft	Penfield & Smith 10 of 63
Fire Hydrants	3		18 sf	3 ft	Penfield & Smith 5-10 of 63
<u>Ramirez Creek Restoration/ Enhancement Plan</u>	<u>n/a</u>		<u>1,248 lf</u>	<u>n/a</u>	<u>53 to 63 of 63</u>
Foot Bridge	1 on Trail 1A at Ramirez Canyon Creek		192 sf	at-grade	Penfield & Smith 7 of 63
Utilities: Sewer Water	Sewer/Water: w/in Area 2 only		Sewer: 4-in, 560 lf (total Phase1 & Phase2) Water: 4-in, 425 lf (total Phase1 & Phase2)	below-grade	Penfield & Smith 5-7 of 63
Trails	See Table 4, below				
RAMIREZ CANYON: PHASE 2					
Area 1					
Campsites	2 small type 2	905 cy cut 1,380 cy fill (total Phase 2 Site-wide, not incl. Parking Areas) 720 lf (retaining walls)	600 sf	at-grade	Penfield & Smith 5 & 6 of 63
Parking	48 (existing reconfigured, 2 ADA)		4,425 sf	at-grade	
Restrooms	2 singles		247 sf	12 ft	
Day Use-Picnic Areas	3 (2 picnic tables)		N/A	at-grade	
Water Tanks	Existing tanks to be used		No change	No change	
Wildland Fire Hydrants	1		6 sf	3 ft	
Area 2					
Day Use-Picnic Areas	3 (3 picnic tables)		N/A	at-grade	Penfield & Smith 5 & 7 of 63

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Facility Improvement	Quantity (maximum)	Grading (maximum cy)	Footprint (maximum sf/lf)	Height (maximum) as applicable	Plans Reference ² (sheet no.)		
Restrooms	1 double		No change from Phase1	No change from Phase1			
Water Tanks	Existing tanks to be used		No change from Phase1	No change from Phase1			
Kanan Dume Road Parking Area 1							
Parking	5 (1 ADA)	No change from Phase1	No change from Phase1	No change from Phase1	Penfield & Smith 4 & 8 of 63		
Kanan Dume Road Parking Area 2							
Parking	4 (1 ADA)		No change from Phase1	No change from Phase1			
Kanan Dume Road Parking Area 3							
Parking	5 (0 ADA)		No change from Phase1	No change from Phase1			
Access Road Improvements							
Via Acero Road Emergency Secondary Access	2,938 lf (road) 1,460 lf (walls)	1,587 cy cut 2,946 cy fill 1,359 cy import	40,434 sf	at-grade (road) 5 ft (walls)	Penfield & Smith 4 & 45-49 of 63		
Other Site-wide Improvements							
Camp Host Site Ranger/Maintenance Supervisor Residence	1 existing, yr-round ranger's residence	905 cy cut 1,380 cy fill (total Phase 2 Site-wide, not incl. Parking Areas)	No change	No change	Penfield & Smith 5 of 63		
Foot Bridge	1 on Trail 1A at Ramirez Canyon Creek		No change from Phase1	No change from Phase1	Penfield & Smith 7 of 63		
Emergency Fire Shelters	2 1 total: Peach Building/ Camp Host Site retrofitted, if required & 1 optional, west of Murphy Way on Trail 2A6		No change from Phase1	No change from Phase1	Penfield & Smith 10 of 63		
Utilities: Sewer Water Other (Electrical, Communication)	Sewer/Water/ Other: w/in Area 1 only (No change from Phase1 in Area 2)		Sewer: 4-in, 560 lf (total Phase1 & Phase2) Water: 4-in, 425 lf (total Phase1 & Phase2) Other: 252 lf		below-grade	Penfield & Smith 5-7 of 63	
Trails	See Table 4, below						

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Facility Improvement	Quantity (maximum)	Grading (maximum cy)	Footprint (maximum sf/lf)	Height (maximum) as applicable	Plans Reference ² (sheet no.)
LATIGO CANYON					
Day Use Area					
Day Use-Picnic Sites	4 (7 picnic tables)	30 cy cut (total Site-wide, not incl. Parking Area)	N/A	at-grade	Penfield & Smith 16 of 63
Parking	*see Parking Area		*see Parking Area	at-grade	
Parking Area					
Parking/Driveway	4 (1 ADA)	85 cy fill	5,208 sf	at-grade	Penfield & Smith 16 of 63
Restroom	1 single		247 sf	12 ft	
Other Site-wide Improvements					
Utilities: Water	Water: Parking Area only	30 cy cut (total Site-wide, not incl. Parking Area)	Water: 3-in, 348 lf	below-grade	Penfield & Smith 16 of 63
<u>Fire Hydrant</u>	<u>1</u>		<u>6 sf</u>	<u>3 ft</u>	<u>16 of 63</u>
Trails	See Table 4, below				
CORRAL CANYON (INCLUDES SOLSTICE CANYON TRAIL SEGMENT)					
Camp Area 1					
Campsites	5 small type 1 12 large	306 cy cut 306 cy fill (total Site-wide, not incl. Parking/Drop Off Area)	10,100 sf	at-grade	Penfield & Smith 25 & 27 of 63
Restrooms	1 double		247 sf	12 ft	
Water Tank	1 10,000-gallon		201 sf	13 ft	
Emergency Fire Shelters	2 optional		384 sf	11 ft	
Wildland Fire Hydrant	<u>5 + 1 on trail</u>		36 lf (retaining walls)	30 <u>36</u> sf	
Day Use Area 2					
Day Use-Picnic Sites	1 (2 picnic tables)		N/A	at-grade	Penfield & Smith 25 & 28 of 63
Parking/Drop Off Area					
Parking/Driveway/Drop Off Area	34 (2 ADA); 15 existing	48 cy cut 6 cy fill 66 lf (retaining walls)	5,640 sf	at-grade	Penfield & Smith 25-26 & 28 of 63
Restrooms	2		494 sf	12 ft	
Camp Host Site Employee Residence	1		600 sf	12 ft	
<u>Gray Water Underground Holding Tank</u>	<u>1</u> <u>Max. 2,000-gal.</u>				
Fire Truck Shed	1		675 sf	12 ft	

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Facility Improvement	Quantity (maximum)	Grading (maximum cy)	Footprint (maximum sf/lf)	Height (maximum) as applicable	Plans Reference ² (sheet no.)
Fire Hydrant	1		6 sf	3 ft	
Pump Station/ Fire Connection	1 (2 tanks)		600 sf	12 ft	
Other Site-wide Improvements					
Emergency Fire Shelter	1 optional, east of Trail 13B	306 cy cut 306 cy fill	192 sf	11 ft	Penfield & Smith 19 of 63
Utilities: Fire Water Water* Other (Electrical/Communication) *incl. 10-12-in. PCH extension	Fire Water: Camp Area 1 & Parking/Drop Off Area Other: Parking/Drop Off Area	(total Site-wide, not incl. Parking/Drop Off Area) 36 lf (retaining walls)	Fire Water: 6-in, 555 lf Water: 6-12-in, 510 lf Other: 3,025 lf	below-grade	Penfield & Smith 25-28 of 63
Trails	See Table 4, below				
MALIBU BLUFFS					
Camp Area 1					
Campsites	4 small type 1 6 large	288 cy cut 450 cy fill (total Camp Areas)	5,650 sf	at-grade	Penfield & Smith 29-34 of 63
Parking	*See Parking Area 1		*See Parking Area 1	*See Parking Area 1	
Restrooms	1 single		127 sf	12 ft	
Wildland Fire Hydrants	3		18 sf	3 ft	
Camp Area 2A					
Campsites	6 small type 1		4,450 sf	at-grade	
Restrooms	1 single		127 sf	12 ft	
Wildland Fire Hydrants	2		12 sf	3 ft	
Camp Area 2B					
Campsites	5 large		3,375 sf	at-grade	
Wildland Fire Hydrants	2		12 sf	3 ft	
Pedestrian Foot Bridge	1		192 sf	at-grade	
Camp Area 3					
Campsites	5 large		3,375 sf	at-grade	
Restrooms	1 single		127 sf	12 ft	
Wildland Fire Hydrants	2		12 sf	3 ft	
Emergency Fire Shelter	1 optional		192 sf	11 ft	
Camp Area 4					
Campsites	5 small type 1 4 large		4,700 sf	at-grade	

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Facility Improvement	Quantity (maximum)	Grading (maximum cy)	Footprint (maximum sf/lf)	Height (maximum) as applicable	Plans Reference ² (sheet no.)	
Restrooms	1 double		247 sf	12 ft		
Wildland Fire Hydrants	5		30 sf	3 ft		
Emergency Fire Shelters	2 optional		384 sf	11 ft		
Parking Area 1 & Adjacent Area						
Parking/Driveway	26 (3 ADA)	378 cy cut 1,266 cy fill (total Site-wide, not incl. Camp Areas or Access Roads) 276 lf (retaining walls)	11,334 sf	at-grade	Penfield & Smith 29-31 of 63	
Overflow Area/ Future Storage	1		696 sf	at-grade		
Fire Truck Shed	1		675 sf	12 ft		
Restrooms	1 single & 1 double		374 sf	12 ft		
Camp Host Site	1		600 sf	12 ft		
Employee Residences	2		1,200 sf	12 ft		
<u>Gray Water Underground Holding Tank</u>	<u>2</u> <u>Max. 2,000-gal.</u>					
Water Tank	1 10,000-gallon		201 sf	13 ft		
Fire Hydrant	1		6 sf	3 ft		
Parking Area 3						
Parking/Driveway	14 (3 ADA)		11,256 sf	at-grade		
Restrooms	1 single		127 sf	12 ft		
Camp Host Site	1		600 sf	12 ft		
Water Tank	1 10,000-gallon		201 sf	13 ft		
Fire Hydrant	1		6 sf	3 ft		
Malibu Road Restroom Area						
Restrooms	1 double	378 cy cut 1,266 cy fill (total Site-wide, not incl. Camp Areas or Access Roads)	247 sf	12 ft	Penfield & Smith 29 & 34 of 63	
Pedestrian Foot Bridge	1		192 sf	at-grade		
Access Road Improvements						
Access Roads & Bridges	Access Roads: Camp Areas 3 & 4 and Parking Areas 1 & 3. <u>Pedestrian Foot Bridges: Parking Area 1</u>	336 cy cut 96 cy fill	18,360 sf 96 lf (walls)	at-grade (roads) 5 ft (walls) 5 ft handrails (bridges)	Penfield & Smith 29-34 of 63	

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Facility Improvement	Quantity (maximum)	Grading (maximum cy)	Footprint (maximum sf/lf)	Height (maximum) as applicable	Plans Reference ² (sheet no.)
Other Site-wide Improvements					
Picnic Area	1 (2 picnic tables)	378 cy cut 1,266 cy fill (total Site-wide, not incl. Camp Areas or Access Roads)	N/A	at-grade	Penfield & Smith 29 & 34 of 63
Pedestrian Foot Bridges	3 <u>2</u> (in addition to 2 listed above)		192 sf ea.	at-grade	Penfield & Smith 30-34 of 63
Utilities: Fire Water Water Other (Electrical/Communication)	Fire Water: Parking Areas Water: Site-wide		Fire Water: 6-in, 26 lf Water: 6-in, 5,258 lf Other: 544 lf	below-grade	Penfield & Smith 30-34 of 63
Trails	See Table 4, below				

**TABLE 4
Malibu Parks Public Access Enhancement Plan-Public Works Plan Trail Improvements Summary**

Trail Segment	Length (maximum ft)	Grading (maximum cy)	Retaining Walls (maximum lf)	Plans Reference ³ (sheet no./date)
TRAIL IMPROVEMENTS				
Ramirez Canyon				
Trail 1A. Kanan Dume to Ramirez Canyon	4,465 ft	3,290 cy cut 690 cy fill	5,960 lf	Penfield & Smith 5, 9 & 10 of 63
Trail 2A3/2a6. Ramirez Canyon to Murphy Way	7,267 ft		3,900 lf	
Trail KDPS (Kanan Dume Parking Spur)	874 ft	<u>107 cy cut</u> <u>63 cy fill</u>	<u>n/a</u>	<u>4, 8, and 9 of 63</u>
Trail 2a7-HG (Herb Garden)	909 ft	<u>253 cy cut</u> <u>50 cy fill</u>	<u>70 lf</u>	<u>5, 6, and 10 of 63</u>
Escondido Canyon				
Trail 4B. Murphy Way to Escondido Canyon	8,200 ft	2,260 cy cut 470 cy fill	1,980 lf	Penfield & Smith 11, 12 & 15 of 63
Trail 9/9A. Escondido to Latigo	2,850 ft		1,320 lf	
Latigo Canyon				
Trail 9B. Latigo to Solstice	7,100 ft	1,410 cy cut 300 cy fill	4,440 lf	Penfield & Smith 15-16 of 63
Corral Canyon (includes Solstice Canyon)				
Trail 10B/11A. Solstice to Corral	7,814 ft	12,920 cy cut 2,690 cy fill	2,808 lf	Penfield & Smith 17-18 & 22 of 63
Trail 11C/12/15. Corral North	23,794 ft		13,332 lf	Penfield & Smith 17-23 of 63
Trail 11D. Old Road West	1,484 ft		240 lf	Penfield & Smith 17-18 of 63
Trail 13A. Corral Easement	1,167 ft		612 lf	Penfield & Smith 17, 19 & 23 of 63
Trail 13B. Corral North Link	1,376 ft		504 lf	Penfield & Smith 17, 19 & 23 of 63

3 See Appendix A TM 3, Modified Redesign Alternative Civil Plans within the Final EIR.

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Trail Segment	Length (maximum ft)	Grading (maximum cy)	Retaining Walls (maximum lf)	Plans Reference ³ (sheet no./date)
Trail 11E. Corral Camp	840 ft		1,008 lf	Penfield & Smith 17, 22 & 24 of 63
Trail 11E. Corral Camp North	794 ft		48 lf	Penfield & Smith 17, 22 & 24 of 63
Trail 14. Old Road East	21,540 ft		6,912 lf	Penfield & Smith 17, 19, 22-24 of 63
Malibu Bluffs				
Trail Alignment 16	1,400 ft	500 cy cut 460 cy fill	384 lf	Penfield & Smith 29-30 & 34 of 63
Trail Alignment 17	1,736 ft		1,176 lf	Penfield & Smith 29 & 31 of 63
Trail Alignment 18	623 ft		N/A	Penfield & Smith 29 & 32 of 63
Trail Alignment 19	399 ft		N/A	29 of 63

Suggested Modification 54

4.1.1 NOID Content and Procedures

Prior to commencement of any development included in the PWP, the Conservancy/MRCA shall notify the Commission and other interested persons, organizations, and governmental agencies (including, but not limited to, the local government where the project is located) of the impending development. No development shall take place within 30 working days after the notice.

A NOID for any PWP project shall be clearly titled as such and shall, at a minimum, include the following information regarding the development project authorization:

...

IV. FINDINGS AND DECLARATIONS

The Commission hereby finds and declares as follows:

A. PLAN BACKGROUND

In 2006, the Conservancy and the MRCA began the public hearing process on a former version of the Public Works Plan for public access enhancement in the Conservancy's various Malibu/Santa Monica Mountains park and recreation areas. The draft plan was submitted to the Commission on June 9, 2006 and, after review by staff, on June 30, 2006, the Commission informed the Conservancy and the MRCA that it could not accept the proposed PWP because it was submitted as a draft document and had not been formally adopted by resolution of the Conservancy and/or the MRCA as required by Section 30510 of the Coastal Act. However, in anticipation of a future, formally adopted, submittal the Commission offered comments on the Draft Plan. The Conservancy and MRCA then continued with public hearings and formally adopted the Plan on November 29, 2006. However, the City of Malibu objected to the Conservancy's and the MRCA's determination to proceed with a public works plan. The City contended that the improvement proposals were more appropriately addressed by obtaining a coastal development permit from the City, consistent with the LCP. The City further argued that certain components of the public works plan were inconsistent with the certified LCP and therefore required an LCP amendment.

In early 2007, the Conservancy and the City reached an agreement to revise various elements of the proposed plan and to prepare and process an LCP amendment with the City of Malibu. The resultant LCP amendment (LCPA No. 07-002) was filed with the City on April 23, 2007 and the City's review process resulted in a number of public meetings and hearings on the proposed Plan. During the City's review process the proposed PWP document was set aside and in its place the Conservancy/MRCA prepared the Malibu Parks Public Access Enhancement Plan Overlay District for incorporation into the City's LCP. The City Council approved LCPA No. 07-002 at their December 5, 2007 hearing. However, in response to public comment which included local opposition to overnight camping within the City of Malibu, the LCP amendment as approved by the City Council prohibited and/or deleted a number of the primary components of the proposed Plan intended to enhance public access and recreation in the Plan area. The City's action on the proposed LCP amendment request included a prohibition on all camping facilities and uses throughout the City of Malibu (with the exception of two (2) ADA campsites proposed at Ramirez Canyon Park that would be subject to conditional use permit requirements), deletion of public parking facilities necessary to support parkland and trail access for Escondido Canyon Park, and a reduction of public uses of Ramirez Canyon Park (as well as the requirement to build a new access road into Ramirez Canyon from Kanan-Dume Road prior to implementing those uses at Ramirez Canyon Park).

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Unhappy with the City Council's December 5, 2007 action on the proposed LCP Amendment, the Conservancy and MRCA held a number of public hearings to discuss options for proceeding with the proposed Plan and Overlay District pursuant to the LCP override provisions found in Coastal Act Section 30515.

Public hearings of the Conservancy and MRCA were held on December 28, 2007 and January 9, 2008, respectively, in which the Conservancy and MRCA acted to proceed with project planning and design for development of additions and refinements to the Malibu Park Public Access Enhancement Plan Overlay District; additional project planning and design for the LCP amendment, and to authorize the Executive Director to submit the Malibu LCP amendment to the Executive Director of the California Coastal Commission pursuant to the LCP override procedures of PRC Section 30515 and 14 CCR Section 13666 *et seq.* In taking this action the Conservancy and MRCA found that the LCP amendment as adopted by the Malibu City Council on December 5, 2007 was contrary to the action of the Malibu Planning Commission, and effectively reduced the allowed uses of public parkland, restricted access to parks owned by the Conservancy and MRCA, and failed to fulfill the intent of the original Public Works Plan, contrary to the intent of the LCP amendment as proposed by the Conservancy and MRCA.

Additional public hearings were noticed and held by the Conservancy and MRCA on January 28, 2008 and February 6, 2008, respectively, in which the agencies reiterated their support and authorization for the Executive Director to submit the LCP Amendment to the Executive Director of the Coastal Commission pursuant to PRC Section 30515, finding that the amendment meets public needs of an area greater than that included within the certified Malibu LCP that had not been anticipated at the time the LCP was before the Commission for certification.

On April 15, 2008, the Conservancy and the MRCA submitted an LCP amendment application for a Malibu Parks Public Access Enhancement Plan Overlay District to the Commission with a request for a preliminary determination by the Executive Director pursuant to 14 CCR Section 13166 and PRC Section 30515, as to the applicability of the Certified LCP Amendment Override Procedures contained in 14 CCR Section 13166. On May 15, 2008, the Commission preliminarily determined that the Conservancy's proposed LCP Amendment qualified as being subject to the Certified LCP Amendment Override Procedures contained in 14 CCR Division 5.5, Chapter 11, Sub-chapter 2 (Sections 13666 to 13666.4). The preliminary determination and associated LCP amendment submittal was forwarded to the City of Malibu for its consideration and action. The City then had ninety (90) days from receiving the amendment request submittal (i.e., until mid-August) to review the proposal and amend their LCP pursuant to 14 CCR Section 13666.2(a).

On July 15, 2008, the Coastal Commission received the Conservancy's and MRCA's City of Malibu Local Coastal Program (LCP) Amendment "Override" submittal for the Malibu Parks Public Access Enhancement Plan Overlay District. The amendment proposed to establish an overlay district for specific park properties within the City of

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Malibu with comprehensive policies and development standards to allow for implementation of public access and recreational improvements. On June 10, 2009, the Commission approved the proposed LCP amendment with revisions. The Commission then adopted revised findings at the October 2009 Commission hearing in support of their action on June 10, 2009.

The Malibu Parks Public Access Enhancement Plan Overlay (Overlay) is a special land use and implementation plan overlay in the LCP that includes a comprehensive set of policies and development standards for public access and recreation-oriented development within specific park properties and recreation areas in Malibu, including Ramirez Canyon Park, Escondido Canyon Park, the Latigo Trailhead property, Corral Canyon Park, and the Malibu Bluffs Conservancy Property. The Overlay further identifies specific actions necessary to implement improvements intended to enhance public access and recreation opportunities throughout the area covered by the Overlay including: creation of an interconnected system of trails, parks, open space, and habitats; improvement of alternative methods of transportation between parklands in the area; and identification of recreational facility and program improvements for the park properties to better support existing recreational demand and to facilitate an increased level of accessibility for visitors with diverse backgrounds, interests, ages, and abilities.

Pursuant to Section 30605 of the Coastal Act, the proposed PWP that is the subject of this staff report has been developed to serve as the facilities plan for lands subject to the Overlay, as defined by Section 3.4.2 of the Malibu LCP. The Plan area also includes specific park and recreation areas located within adjacent lands of unincorporated Los Angeles County.

Pursuant to Public Resources Code Sections 21080(c) and 21080.1, and CEQA Guidelines Section 15063, an Initial Study (IS) was prepared for the proposed Plan. The IS determined that a number of environmental issue areas may be impacted by the proposed Plan. As a result, the IS determined that an Environmental Impact Report should be prepared to address the Plan's potential significant impacts on a variety of environmental issue areas. A Draft Environmental Impact Report (DEIR) was completed in February 2010 for the proposed plan. A Notice of Completion was filed with the State of California Office of Planning and Research (OPR) on February 2, 2010, which began a required minimum 45-day public review period for the DEIR. Notices of Availability were mailed out to public agencies, interested persons, and individual property owners within the project vicinity. In addition, a Notice of Availability was published in the Malibu Surfside News. During the required minimum 45-day public review period, members of the public were invited to submit written comments on the EIR to the Conservancy/MRCA. In addition, a public meeting to receive oral testimony occurred on Monday, February 22, 2010, at a joint meeting of the Conservancy/MRCA Boards. The comment period for the DEIR officially closed on March 22, 2010, although late comments received through July 2010 were also accepted. Comments received on the DEIR and responses to those comments, and any pertinent additional information, have been incorporated into the FEIR. The FEIR and proposed PWP were adopted by the

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Conservancy/MRCA Boards during a noticed public hearing on August 23, 2010. The Conservancy/MRCA submitted the proposed PWP and supporting documents to the Commission on August 26, 2010. On September 2, 2010, the Commission determined the PWP to be properly submitted and complete. Pursuant to California Code of Regulations Sections 13356 and 13357, public works plans must be scheduled for a public hearing and the Commission must take action within 60 days of a complete submittal. The 60th day after filing the complete submittal is November 1, 2010.

B. DESCRIPTION OF THE PLAN AREA

The Plan area is located along the Malibu coastline in the Santa Monica Mountains area (Exhibit 1). The Santa Monica Mountains are generally characterized by large open space areas with low density, rural residential development and consists of the last large undeveloped area contiguous to the shoreline within the greater Los Angeles metropolitan region. Although characterized largely by expansive open spaces areas, scattered enclaves of small lot subdivisions with higher residential densities occur throughout the Santa Monica Mountains area. Small lot subdivisions within or near the Plan area include Malibu Vista, El Nido, and Malibu Bowl. In addition, the Pacific Coast Highway corridor is relatively developed with low to moderate density residential and commercial land uses. The topography and habitat of the Plan area vary substantially and are particularly diverse at each of the Conservancy and MRCA-owned parklands where new recreational facilities are proposed. The Plan area includes land consisting of coastal hillsides, canyons and terraces with habitat types ranging from highly disturbed within developed residential areas located along existing and proposed roadway trail corridors and the relative developed conditions of Ramirez Canyon Park, to stands of coastal sage scrub, chaparral and riparian corridors which have been preserved within the public parklands of the Plan area. The parklands subject to the proposed Plan improvements consist primarily of open, undeveloped coastal land and, as such, provide significant connecting links between the coast and large, undisturbed habitat areas in the Santa Monica Mountains. Though all the park properties have experienced some disturbance, the lands remain relatively undisturbed and collectively consist of vegetated coastal bluff terrain, oak woodland, steep canyons containing riparian oak-sycamore bottoms, and coastal sage scrub and chaparral ascending the canyon walls. The Plan area, in its entirety, represents a significant scenic area in that it provides views from within the parklands and trail system to and along the ocean and coastline and the surrounding mountain terrain.

The proposed PWP includes specific public access, recreational facility (including campgrounds), and program improvements for four park properties owned by the Santa Monica Mountains Conservancy and the Mountains Recreation and Conservation Authority: Ramirez Canyon Park, Escondido Canyon Park, Corral Canyon Park, and Malibu Bluffs Park (Exhibits 2-5). In addition, the plan includes trail connections for the Coastal Slope Trail and other connector trails which would link the four above-mentioned parks and other recreation areas within the City of Malibu including Solstice

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Canyon Park and the Zuma/Trancas Canyon Units - owned and operated by the National Park Service (Exhibits 2-5).

1. Ramirez Canyon Park

Ramirez Canyon Park consists of 22 acres of land located in Ramirez Canyon off the Malibu coastline and is bordered by National Park Service land in its northern portion, and private residential land in its southern portion. The park contains five structures once serving as residences on six separate lots. Barbra Streisand donated this 22-acre estate to the Santa Monica Mountains Conservancy in December 1993. Because Ramirez Canyon Park contains a number of structures, gardens, and designed hardscape on the majority of the property associated with the former ownership, rather than the open natural habitat typically associated with other park properties, the park serves to provide a range of diverse environmental, cultural, and educational opportunities for both passive and active recreation activities. The more developed nature of the park lends itself well to function as a place for special, pre-arranged activities, events, and functions typically permitted by the State Parks system for the benefit of the community and visitors.

Access to Ramirez Canyon Park is provided through a gated entrance at the terminus of Ramirez Canyon Road. The park currently provides 54 parking spaces. Of these, three are allocated for use by people with disabilities; however, they do not meet the technical specification for accessibility (e.g., striping, signage, etc.). At the request of local neighbors along Ramirez Canyon Road and pursuant to the conditions of a Coastal Development Permit previously issued by the California Coastal Commission, public access to the park property is by appointment only and vehicular access is limited to a maximum of 80 daily trips. As these daily trips are a combination of inbound and outbound trips, the total number of inbound trips is half of the daily trips (40 inbound, 40 outbound trips). Vehicular access to Ramirez Canyon Park is currently monitored to ensure that the total number of trips to and from the site does not exceed 80 daily trips. The Ramirez Canyon Park site currently generates average daily trips (ADT) of 54 on weekdays (27 round trips) and 16 on weekend days (8 round trips).

Ramirez Canyon Park is bisected by the City of Malibu-County of Los Angeles jurisdictional boundary. The portion of the park property located within the City of Malibu is designated and zoned as Public Open Space (OS) in the Local Coastal Program, while the balance of the property located in the Los Angeles County is designated Rural Land III (1 unit/2 acres) and Mountain Land (1 unit/20 acres), and is zoned A-1-1, Light Agriculture.

Ramirez Canyon Park contains a number of support facilities for the park's public use programs including picnic areas, restrooms, educational displays, sitting benches, gardens, and a riparian area interpretive trail. The park contains five primary structures on six separate lots: the Barwood building, Peach House, Art Deco building, Barn, and Ranger/Maintenance Supervisor Residence.

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Ramirez Canyon Park includes a state-of-the-art wastewater treatment and recycled water disposal system that serves the Barwood building, Peach House, and Barn. The system provides secondary treatment, filtering and disposal of the effluent for reuse in subsurface landscape irrigation. The highly treated effluent is pumped to a terraced orchard area onsite for subsurface irrigation. The Art Deco House and Caretaker's residence are both served by independent septic systems.

Natural Resources

Ramirez Canyon Park is traversed by Ramirez Canyon Creek within the west and southernmost portions of the property, and contains extensive stands of native coastal sage scrub habitat along the canyon walls and northern portion of the property which is adjacent to National Park Service land. Ramirez Canyon Creek is a blueline stream with regular water which is conveyed to the Pacific Ocean at Paradise Cove. Ramirez Canyon Park ranges in elevation from 250 feet above mean sea level (AMSL) at the southern end of the park to approximately 700 feet AMSL at the eastern edge. Given the occurrence of Ramirez Canyon Creek and those areas vegetated with native coastal sage scrub habitat outside of the developed areas of the park, the majority of the park property is mapped as an Environmentally Sensitive Habitat Area in the City of Malibu Local Coastal Program. However, many of the areas within the ESHA mapped under the City of Malibu LCP (2002) and by the County's Coastal LUP (1986) are currently developed or disturbed. A site specific analysis, including detailed vegetation mapping and land use characterization, has been completed and included in the EIR.

Planning/Permitting History

A Riparian Habitat Evaluation study, prepared by LSA Associates, Inc., August 30, 2002, details the history of development on the property beginning with construction of the first residence in 1953. Based on a review of historic aerial photographs and legal records, the study documents site conditions prior to 1977 (prior to establishment of the Coastal Commission and effectiveness of the Coastal Act in January 1977) and reports that all residential structures and associated infrastructure were developed on the property prior to 1977. In addition, the existing tennis court, swimming pool, various garden pads including the existing meadow, the park entrance Arizona stream crossing, and the retaining wall and bridge at Barwood are documented to have been developed prior to 1977. The study states that it is likely that some type of stream bank stabilization measures were constructed prior to 1977 to protect the residences and the two road crossings. While most of the existing structural development of Ramirez Canyon Park was developed prior to 1977, the study reports that much of the existing stream channelization of Ramirez Canyon Creek was conducted by previous property owners subsequent to 1977 without the benefit of permits. In the early 1980's, rock walls were installed along a 1,600-ft. stretch of creek channel adjacent to the residences and meadow. A total of nine gabions were installed in conjunction with the wall construction. The study found that given the length of rock wall, width of stream channel, and width of

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riparian canopy, a total of 0.18 acres of stream channel was impacted by stream alterations subsequent to 1977 without benefit of permits.

On April 12, 2000, the Coastal Commission (Commission) approved Coastal Development Permit 4-98-334 permitting the Conservancy to establish and conduct the various administrative uses, programs, and events at Ramirez Canyon Park; which at the time, prior to certification of the City of Malibu Local Coastal Program, was zoned and designated for rural residential use per the City of Malibu zoning code and General Plan. Because the City of Malibu did not have a certified LCP at the time of Commission decision, the standard of review for the proposed project was the Coastal Act. The Commission found that the uses proposed by the Conservancy for the park were consistent with all applicable policies of the Coastal Act subject to a number of special conditions of the permit, all of which were complied with, and the permit was issued by the Commission on February 5, 2001.

The Commission's review of the Ramirez Canyon Park project under Coastal Development Permit 4-98-334 noted that the streambed of Ramirez Canyon Creek through the property has been substantially modified and channelized without the benefit of permits. While the channelization occurred under prior ownership, the Conservancy, as the current property owner, is responsible for seeking the appropriate permits to permit or restore the stream channel as necessary and consistent with all applicable laws. The Conservancy submitted a Coastal Development Permit Application to address the issue of streambed alterations; however, the application was never completed and the issue remains unresolved at this time.

Although the permit was issued by the Commission on February 5, 2001, and the proposed and required improvements and programs were implemented, during the review process the City of Malibu filed suit against the Conservancy in November 1999, alleging that the Conservancy was holding commercial events at its Ramirez Canyon property in violation of the Coastal Act. In addition, in May 2000, the City of Malibu and Ramirez Canyon Preservation Fund filed suit for a writ of mandate, challenging the Commission's April 12, 2000 decision to approve Coastal Development Permit 4-98-334. Ultimately, on February 4, 2005, the Ventura County Superior Court granted the writ of mandate, ruling that at the time the Commission approved Coastal Development Permit 4-98-334, the Conservancy was subject to local land use regulation, and that the Conservancy should have sought approval from the City of Malibu before applying to the Coastal Commission. The Conservancy filed an appeal on November 23, 2005, but subsequently abandoned the appeal on April 10, 2006 in order to pursue an expanded public access program beyond the scope of the original Coastal Commission application for Ramirez Canyon alone. With the exception of the Conservancy's Public Outreach Programs, all programmatic uses of the park approved pursuant to Coastal Development Permit 4-98-334 (events, gatherings, tours, workshops) have been suspended pending the review of the proposed Plan.

2. Escondido Canyon Park

Escondido Canyon Park is located approximately one mile east of Kanan Dume Road in Malibu. The park is approximately 140 acres in size and is mostly surrounded by privately owned land. The park consists of open land heavily vegetated with a variety of native and nonnative plant and tree species. Escondido Canyon Park consists of the Escondido Canyon Natural Area acquired by MRCA in 1990 and the balance of the park property that was acquired by the Conservancy in 1997.

The park is only accessible by the public via pedestrian access along the road shoulder of East Winding Way from a parking lot located on Winding Way at Pacific Coast Highway, approximately 1 mile south of the park boundary. A dirt trail then takes access from the terminus of Winding Way onto the park property. The entire park property is designated and zoned as Public Open Space (OS) in the City of Malibu Local Coastal Program.

Park Facilities

There presently are very few support facilities at Escondido Canyon Park, with the exception of one picnic table at the park entrance. The primary public amenity at the park is the trail system through the Escondido Canyon Natural Area that leads hikers, mountain bikers, and equestrians along a 4.2 mile trail through oak woodland, riparian woodland, and coastal sage scrub habitat to the spectacular, multi-tiered 150-foot Escondido Falls—the highest in the Santa Monica Mountains.

Natural Resources

Escondido Canyon Park is in its entirety naturally vegetated with native and non-native plant species. The majority of the park area can be characterized as relatively undisturbed coastal sage scrub habitat; however, Escondido Creek winds its way through the park along which riparian woodland is the dominating habitat. In addition, areas containing a mix of native and non-native grassland occur in various areas of the park. Various pocket areas of disturbance along the trail are evident through the park. The majority of the park property is designated as an Environmentally Sensitive Habitat Area in the City of Malibu Local Coastal Program. Some of the areas within the ESHA mapped under the City of Malibu LCP are currently developed or disturbed. A site-specific analysis, including detailed vegetation mapping and land use characterization, has been completed for the EIR. Elevation ranges within the park are 100 feet AMSL at the eastern limit of Escondido Creek to 720 feet AMSL along the northern boundary of the park.

Planning/Permitting History

As detailed above, Escondido Canyon Park had been acquired in its entirety by the Conservancy and MRCA by 1997. During the 1997 acquisition of the park, the

Conservancy also began planning for park improvements and initiated the permitting and environmental review process to develop a fifteen car parking lot near the Escondido trailhead adjacent to the terminus of Winding Way, which would have also accommodated one bus and a horse trailer pull-out. The project also included installation of two chemical restrooms, an ADA accessible trail to Escondido Creek, a water fountain, horse trough and hitching post, picnic tables, and trail improvements. A Negative Declaration was approved for the proposed project; however, subsequent permits were never sought and the project was never fully implemented.

3. Latigo Canyon

The Latigo Trailhead property is approximately 2.4 acres of vegetated and disturbed land located in the City of Malibu. The property is accessed via Latigo Canyon Road and is surrounded by privately owned land, but is within approximately 500 feet to the easternmost boundary of Escondido Canyon Park. The property is designated and zoned Rural Residential (1 unit/2 acres) in the City of Malibu Local Coastal Program.

There are presently no park facilities at the Latigo Trailhead property. Remnants of a burned-out residential development occur on the site, which is otherwise vacant. The majority of the Latigo Trailhead property is naturally vegetated with native and nonnative species, with the exception of highly disturbed areas around the driveway access to the property and the burned-out single family residence location. Vegetation communities on the property include annual grassland, coastal sage scrub, oak woodland and southern willow scrub. In addition, a blueline stream traverses the northern boundary of the property adjacent to and parallel Latigo Canyon Road.

The majority of the park property is designated as an ESHA in the City of Malibu Local Coastal Program. Some of the areas within the ESHA mapped under the City of Malibu LCP (2002) are currently developed or disturbed. A site-specific analysis, including detailed vegetation mapping and land use characterization, has been completed for the EIR.

4. Corral Canyon Park

Corral Canyon Park encompasses approximately 772-acres of coastal land in the City of Malibu and unincorporated County of Los Angeles and contains the last undeveloped coastal canyon in Los Angeles County that flows freely to the ocean. The park is surrounded by privately owned land with the exception of where Dan Blocker State Beach lies just south along the shoreline and State and Federal parkland to the north. The park consists of open land heavily vegetated with a variety of native and non-native plant and tree species. The park property is designated and zoned as Public Open Space (OS) in the City of Malibu Local Coastal Program, and Upper Corral Canyon, and is designated Mountain Land (1du/20ac) in the County of Los Angeles Coastal Land Use Plan.

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The property was formerly owned by Bob Hope, who in the early 1990s had County approvals to build a luxury home development and golf course in Corral Canyon. Corral Canyon Park and the trailhead were acquired by the MRCA in 1998 and transferred to the Conservancy in early 2000. The park is easily accessed directly from Pacific Coast Highway between Malibu Canyon and Kanan Dume Roads and also via public transit where a MTA bus stop is located at the entrance to the park.

Park Facilities

The Corral Canyon Park trailhead contains a number of support facilities including public parking, picnic areas, restrooms, sitting benches educational displays, and hiking trails. Corral Canyon Park currently provides 13 parking spaces, one accessible space, and one trailer parking space, for a total of 15 parking spaces. The park contains a 2.5 mile loop trail that climbs through pristine wilderness to the Puerco Canyon watershed divide which provides spectacular ocean and mountain views along coastal bluffs and hillsides. The trailhead also provides seasonal access underneath Pacific Coast Highway to Dan Blocker State Beach.

Natural Resources

Given the unique terrain of Corral Canyon Park, and its proximity to the ocean, the park contains a wide variety of habitat, including coastal sage scrub, coastal bluff, native grassland, and the riparian corridor of Corral Creek which includes among other species alder, coast live oak, California sycamore, and willow trees. A pocket of coastal salt marsh is located where the creek meets the ocean at the Pacific Coast Highway bridge. Various pocket areas of disturbance along the trail are evident in the southernmost portion of the park where a number of structures once existed. The park property is designated as an Environmentally Sensitive Habitat Area (ESHA) in the City of Malibu Local Coastal Program. Within the County's jurisdiction, Corral Canyon Creek is considered ESHA and much of the park is considered Significant Watershed per the County's certified Land Use Plan. A site-specific analysis, including detailed vegetation mapping and land use characterization, has been completed for the EIR. The park ranges in elevation from near sea level at Pacific Coast Highway to 685 feet AMSL near the center of the park.

Planning/Permitting History

On September 26, 2002, the Coastal Commission granted a waiver for Coastal Development Permit 4-02-072-W for the construction of trailhead and trail improvements at Corral Canyon Park. The project included construction of a 15 car public parking lot, one chemical restroom, and a 2.5 mile loop trail through the park. In addition, the project included an ADA accessible picnic area, an interpretive kiosk, park signage, drinking fountain, recycling bins, and an extensive native vegetation planting plan. The proposed improvements were developed and are now available for public use at the park trailhead.

5. Malibu Bluffs Conservancy Property

The Malibu Bluffs Conservancy Property (Malibu Bluffs) encompasses 84-acres of blufftop land in the City of Malibu and contains a large expanse of undeveloped open space directly adjacent to Pacific Coast Highway, Malibu Road and the shoreline. The park is surrounded by privately owned land to the west, the City's 10-acre Malibu Bluffs Park and private land to east, Malibu Road, residential development and the shoreline to the south, and Pacific Coast Highway and Pepperdine University to the north.

Park Facilities

Malibu Bluffs contains very few support facilities with the exception of limited trailhead improvements (signs, trash receptacles) at key entry locations into the property and picnic areas, although picnic areas, restrooms, sitting benches, and other active recreation areas can be accessed on the adjacent City-owned Malibu Bluffs Park. The park contains approximately 2.3 miles of trails that traverse the bluff, and with up-coast and down-coast ocean views. Trails also descend to Malibu Road, where a number of vertical beach access easements exist and are open to the public across, providing year-round access to the beach.

Natural Resources

Malibu Bluffs is in its entirety is naturally vegetated with native and non-native plant species. The majority of the park area can be characterized as annual grassland and coastal sage scrub habitat; however, two drainages traverse the open space in a general north-south direction along which southern willow scrub habitat occurs. In addition, areas containing a mix of native and non-native grassland occur in various areas of the park. The majority of the property, particularly along the site's drainages and where large stands of coastal sage scrub occur, is designated as an ESHA in the City of Malibu Local Coastal Program. Some of the areas within the ESHA mapped under the City of Malibu LCP (2002) are currently developed or disturbed. A site-specific analysis, including detailed vegetation mapping and land use characterization, has been completed for the EIR. The park ranges in elevation from near sea level at Malibu Road to 203 feet AMSL.

Planning/Permitting History

In 1982, the Commission approved the temporary installation (5-year limit) of two ball fields, parking and restrooms on what is now the City's 10-acre Malibu Bluffs Park (Coastal Development Permit 5-82-780). In 1985, the Commission denied a permit amendment request (Coastal Development Permit 5-82-780A) to develop a community park on the entire 94-acre property, finding that the proposed uses were insufficient to serve the growing demand of visitors from the region and elsewhere in California for recreation, namely, recreational uses such as camping, hiking, walking for pleasure and picnicking. The Commission later approved a permit amendment request to develop a

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30-acre park which included an interpretative center, picnic amenities, and walking paths, concession stand and bleachers. The permit amendment further removed the 5-year limit for retaining the ball fields onsite, permitting the ball fields as an interim use subject to a condition requiring the County, which then had jurisdiction over the property, to “seek alternative local recreation facilities, including ball fields, within the Malibu-Calabasas area.” Then in 1998, the Commission waived the requirements of the coastal development permit (4-97-224-W) for construction of a 2,800 ft. long public trail on the park property.

6. Trails

A number of existing trail resources exist in the Plan area particularly within the public parklands that have well developed and maintained trail systems. A fully accessible riparian interpretative trail exists in the northern portion of Ramirez Canyon Park and extends slightly into adjacent National Park Service lands to the north providing a creekside access opportunity for visitors with mobility impairments. Escondido Canyon Park contains approximately 1.3 miles of improved trails. Corral Canyon Park contains a 2 mile loop trail from which one can also gain seasonal access to Dan Blocker County Beach. Malibu Bluffs Conservancy Property offers approximately 2.3 miles of trails overlooking the Malibu coastline and providing access to the shoreline area along Malibu Road. The Zuma and Trancas Canyon area of the Santa Monica Mountains Recreation Area include more than 13 miles of improved trails and fire roads.

Solstice Canyon Park provides approximately 7.3 miles of established trail resources. Adjacent to the Plan area, Malibu Creek State Park includes 15 miles of streamside trails through oak and sycamore woodlands and chaparral-covered slopes. In addition to the trail resources currently provided on public lands in the Plan area, approximately 2.7 miles of public trails also exist within or adjacent to private properties subject to trail easements previously dedicated to public use as part of the entitlement process or donated by a private landowner.

C. PUBLIC WORKS PLAN DESCRIPTION

Pursuant to Section 30605 of the Coastal Act, the subject PWP has been developed by the SMMC and MRCA to serve as the facilities plan for both upland and shoreline recreation and parks areas within the Malibu/Santa Monica Mountains coastal area. The PWP identifies specific public access, recreational facility, and program improvements for the five park properties in the Plan area owned by the Santa Monica Mountains Conservancy and the Mountains Recreation and Conservation Authority: Ramirez Canyon Park, Escondido Canyon Park, the Latigo Trailhead property, Corral Canyon Park, and the Conservancy-owned Malibu Bluffs. The proposed improvements generally include parking, camp areas and associated support facilities, and trail improvements to support existing recreational demand and to facilitate an increased level of accessibility for visitors with diverse backgrounds, interests, ages, and abilities. The plan also addresses opportunities for creek restoration, and administrative and public program uses at Ramirez Canyon Park. The plan incorporates guidelines for fully accessible or

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universal design of trails, camp areas and support facilities, where feasible given the natural constraints of the park areas, and best management practices necessary to maintain facilities for all visitors. The plan also addresses long term programmatic improvements to ensure continued success of the various programs currently implemented and those proposed to facilitate public access and recreation opportunities.

The plan includes a comprehensive set of policies and implementation measures that detail specific development standards and design criteria for the proposed trail and park improvements intended to maximize access and recreation opportunities while protecting coastal resources (Exhibits 4-5).

The specific parking, camping, and support facility improvements are summarized below and are discussed in detail for each particular park property.

1. Camp Sites and Parking

The proposed Plan includes camping primarily at two park locations close to Pacific Coast Highway: Corral Canyon Park and Malibu Bluffs Conservancy Property. The campsites at Corral Canyon Park and Malibu Bluffs Conservancy Property would be clustered and located along the bluffs overlooking the Pacific Ocean. Only two accessible campsites are proposed at Ramirez Canyon Park. Additional discussion and detail of these improvements is provided later in this section.

Proposed camp facilities consist of low impact campsites and associated support facilities, including, where appropriate, day-use picnic areas and picnic tables, potable water, self-contained chemical restrooms, shade trees, water tanks, portable fire suppression apparatus, fire-proof cooking stations, camp host facilities, fire truck sheds, and optional emergency fire shelters. Campsites would be fee-based (collection of camping fees will be conducted in person by rangers and/or camp hosts at all parks) and would be “carry-in/ carry-out” campsites, which are accessed by foot and/or wheelchair and which would have an educational or interpretative component including signage related to the natural resources of the Santa Monica Mountains. The Plan proposes development of three types of campsites; one large campsite type, and two small campsite types (Types 1 and 2). The large campsite would be approximately 27 feet (ft) by 25 ft and would provide a picnic table alongside a tent area within an approximate 675 sq. ft. site. The approximate 20 ft by 20 ft small campsite (Type 1) would consist of approximately 400 sq. ft. of area and would also provide a picnic table parallel to the tent area. The other small campsite (Type 2) would be rectangular in shape and would measure approximately 30 ft by 10 ft, which would allow for a picnic table and a tent area on each end of a 300 sq. ft. site. Campsite ground material would be composed of permeable stabilized soil, stabilized decomposed granite gravel, or dirt that is non-vegetated. All accessible campsites would have a type of stabilized ground material to accommodate people with disabilities.

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Public parking improvements are proposed along Kanan Dume Road (to support access to Ramirez Canyon Park), near the entrance in Ramirez Canyon Park (improvement to an existing parking lot), at the Latigo Trailhead property, Corral Canyon Park (improvement to existing parking lot), and Malibu Bluffs. Parking improvements generally consist of asphalt concrete parking lots (except parking improvements at Corral Canyon Park which would consist of decomposed granite) and include standard and handicap accessible parking spaces and bike racks. Additional permeable materials in parking lot areas would be utilized where feasible and consistent with site-specific geotechnical recommendations. The proposed Plan would provide a total of 157 (existing + proposed) parking spaces within the five parks. There would be drop boxes/iron rangers for collection of parking fees at most parking lots. Potential locations for handicap parking spaces are identified on all project plans. Handicap parking spaces would be posted and marked with both a ground-mounted sign and pavement marking which includes the international symbol for barrier-free environments and a statement informing the public that the parking space is reserved for use by handicapped persons, meeting all requirements set by the Americans with Disabilities Act of 1990.

2. Pedestrian and Vehicle Bridges/Creek Crossings

The proposed Plan includes construction of twelve (12) potential pedestrian trail bridges; one at Ramirez Canyon Creek along trail alignment 1a from Kanan Dume to Ramirez Canyon Park, three at Escondido Creek along trail alignment 4 in the northern portion Escondido Canyon Park, four at Corral Creek along the Beach to Backbone Trail (one along trail alignment 11a, one along trail alignment 14, and two along trail alignment 15), and four within the Malibu Bluffs Conservancy Property. Final engineering design may allow for the construction of additional pedestrian bridges to minimize grading and/or creek encroachments. If required by the appropriate fire agency(ies), one vehicular bridge on Ramirez Canyon Road would be replaced and upgraded to a travel width of 20-ft as part of the Ramirez Canyon Road widening plan. Within Ramirez Canyon Park, an existing Arizona creek-crossing (if required by the appropriate fire agency(ies) to be widened to a travel width of 20 ft) would be widened or replaced with a span bridge as necessary to accommodate any safety requirements of appropriate fire agency(ies).

All other existing minor, at-grade trail crossings located throughout the Plan area currently consist of stepping stones and/or other informal stream crossings; no improvements are proposed at these locations, although existing trail maintenance procedures would continue to be implemented where necessary to support continued access along the existing trail system. Trails and associated improvements would be constructed and maintained in accordance with best practices of trail design and would therefore include drainage conveyances and erosion control devices.

All bridges would be designed such that bridge abutments would be located above the 100-year flow for streams and/or drainages. Bridge abutments for pedestrian bridges may be founded on piles or shallow concrete abutments near the top of bank. Single unit foot bridges spanning 10 to 40 ft would likely be used for smaller creek crossings,

such as the three bridges proposed within the Escondido Creek Watershed. These pedestrian bridges would be low-profile and constructed of materials (such as fiberglass and timber) strong enough to satisfy load carrying requirements, yet light-enough to easily transport into difficult to reach locations. A cable suspension bridge or bridge of equivalent stability, likely composed of concrete, timber and/or steel, would be more appropriate for bridges spanning greater than 80 ft, including the bridge proposed over an unnamed culvert on the Malibu Bluffs Conservancy Property.

3. Fire Safety

a. Fuel Modification and Vegetation Management

The proposed Plan would incorporate fuel modification areas, which are designed to gradually reduce fire intensity and flame lengths from advancing fire by reducing fuels, placing thinning zones, restricted vegetation zones, and irrigated zones adjacent to each other on the perimeter of structures and adjacent naturally vegetated areas. Fuel Modification Plan requirements would vary at each park property depending on site-specific characteristics and the type of improvement/uses proposed. The fuel modification zones would provide defensible space set backs and would be maintained on an annual basis by May 15, or more often if needed, as determined by CAL FIRE or its representative or LACFD; all Conservancy-owned properties are under the fire jurisdiction of CAL FIRE, while MRCA-owned properties are under the fire jurisdiction of LACFD. Maintenance would be provided by the Conservancy/ MRCA and would be consistent with standard fuel management practices.

In consultation with LACFD, the the following fuel modification buffers are currently recommended:

- Fire Shelter: 200'
- Fire Truck Shed: 100'
- Equipment Storage Shed: 100'
- Campsite: 20'
- Parking: 20'
- Roads: 20'
- Restrooms: 20'
- Employee RV/ Camphost RV: 20'
- Employee Residence: 200'

Consistent with LACFD direction, fuel modification zones for all proposed parking and roads may be reduced from 20 ft to 10 ft; such reductions would occur where necessary to avoid impacts to Environmentally Sensitive Habitat Areas (ESHA). It should be noted that although the above buffers were utilized for purposes of a reasonable worst-case analysis in the preparation of the Final EIR, based on preliminary communications with LACFD, it may be possible to reduce these fuel modification buffers based upon CAL FIRE and/or LACFD review of final construction drawings. LACFD has suggested, for

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instance, that the fuel modification buffer for the employee residence at Corral Canyon Park may be able to be reduced due to topographical and other factors associated with the proposed building's setting.

b. Cook Stations (Hospitality Stations)

Campers would be required to utilize designated cook stations (hospitality stations) provided at each approved campsite, which would be designed of nonflammable materials and capable of being enclosed vertically on three sides (leaving one side open for cooking operations); a horizontal rain cover would also be provided. Cold-camping apparatus such as flame-less cook-stoves and lanterns would be required; use of any type of liquid fuel (alcohol, kerosene, unleaded gasoline, white gas, mentholated Spirit, etc), canister fuel (propane, butane, etc), wood, wax or any other type of combustible material for cooking or lighting would be expressly prohibited.

Each cook station would be equipped with an all-weather electrical outlet. Upon check-in by a wild-fire trained camphost or ranger, campers would be informed of the No Campfire/Cold Camp Policy and would be offered the opportunity to check-out a dual burner electrical hot plate for cooking purposes during their stay; a nominal deposit would be required. Use of electric hot plates, grills, griddles, waffle irons, and/or similar small electrical cooking appliances brought from home would be permissible at the designated cook stations only.

Upon reserving and registering for use of camp facilities, prospective campers would be put on notice that unauthorized use of fire-related camping and cooking apparatus is specifically prohibited by the No Campfire/Cold Camp Policy, but that use of small electrical cooking appliances would be permissible. Campers would be notified that use of fire-related camping and cooking apparatus would be cause for expulsion of visitors from camp facilities and punishable by fines up to \$1,000.00. Signs would be posted at the designated cook stations informing campers of the No Campfire/Cold Camp Policy. In addition, campers would be notified that use of the cook station electrical outlet(s) for space heaters, lighting sources, hair curling and flattening devices, blow dryers, stereos or other devices emitting audible noise would be cause for confiscation of such devices and/or expulsion of visitors from camp facilities.

c. Water Storage Tanks

The Plan proposes construction of water lines to provide water to the proposed campsites and park/ trail facilities, as well as for increased fire protection. With the exception of the existing water storage facilities at Ramirez Canyon Park, water lines would connect to proposed water tanks at each park, with each tank having a capacity of 10,000 gallons. The existing water tanks at Ramirez Canyon Park would remain in place and would be utilized for proposed park improvements at that location. There are currently two proposed configurations for the 10,000-gallon water tanks which would be installed at park properties not currently served with water tanks for increased fire protection. The two corrugated steel tank options would either be 1) approximately 12 ft

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4 in. in diameter, with a height of approximately 11 ft 3 in., or 2) approximately 11 ft 8 in. diameter with a height of 13 ft.

At Corral Canyon Park, a water tank at the top of a knoll would provide a pressurized water source for fire-fighting capabilities, which would be connected to a pump station a few feet above sea level to provide adequate pressure to fill the tank. Water tanks at the other parks would provide a secondary unpressurized water source for fire-fighting (in addition to the hydrants). Ramirez Canyon Park currently has a 4,500-gallon and a 10,000-gallon water tank, one central wharf head, and water lines.

d. Fire Hydrants

All of the park properties where camping is permitted will receive new fire hydrants for fire protection. The fire hydrants would consist of standard fire hydrants and wildland fire hydrants. Standard fire hydrants include both a 4-in. and a 2 ½-in. outlet, while a wildland fire hydrant includes one 2 ½-in. outlet. Standard hydrants would be installed at the Latigo Trailhead and would have a maximum 4-in. feed. Hydrants at Malibu Bluffs Conservancy Property would have a minimum 4-in. feed from PCH. All proposed water infrastructure would have back flow prevention devices.

Water lines would be installed underground to the camp areas to service hose bibs with drainage sumps. In addition to the hydrants described above, a wildland fire hydrant connected to this water line would be located within 50 ft of any campsite. The wharf head (i.e., wildland fire hydrant) would provide a 2½-in. hose connection for Fire Department use. In addition, a ball valve (to turn the water on and off) would connect to a hose reel with 100 ft of 1-in. fire hose and a permanently attached nozzle, which a ranger, fire fighter, wildfire-trained camp host, or camper could use in case of emergency.⁴ The hose reel would be on a metal stand with a small shade roof, approximately less than 3 ft. in height and beige. It would then be placed on a concrete pad, which would be approximately 2 ft. by 3 ft., and 6 in. thick.

e. Additional Fire Protection Apparatus and Relocation Planning

Additional fire protection apparatus would be provided and maintained at all camp facilities and would include, at a minimum: a portable and air-powered quick attack firefighting system to be provided at each camp facility for ready deployment by trained Camp Host, Ranger, or park personnel in the event of a fire; and, portable self-contained fire extinguisher units to be provided for each cluster or group of campsites.

During a fire emergency, early relocation from the parks would be the preferred method of safety when adequate warning is provided, which is anticipated to be the majority of the time when wildfires occur. The Plan includes a relocation planning process that is an

⁴ Campers would be encouraged to utilize fire extinguishers for any observed small fires and to report any and all fires to a wildfire-trained camp host or ranger, who are trained in emergency response and the use of all on-site fire fighting equipment. There is no expectation that campers would stay on-site to extinguish a wildland fire.

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orderly, pre-planned process where people are relocated from the parks to off-site areas away from wildland fuels in the event of a fire. During relocation, MRCA Rangers/wildfire-trained camp hosts/fire fighting personnel would direct staff and visitors to utilize the primary access points in the various parks.

Within Ramirez Canyon Park specifically, driveways/roads would be widened to necessary widths and additional fire hydrants added, if required by the appropriate fire agency.

Ramirez Canyon Park, Escondido Canyon Park, Latigo Trailhead, Corral Canyon Park and Malibu Bluffs shall be closed to all recreational use during any Red Flag Day/period as declared for the Santa Monica Mountains area by the National Weather Service, a division of the National Oceanic Atmospheric Administration (NOAA).

It is considered very unlikely that a wildfire scenario would occur that would preclude safe relocation of visitors and staff from the parks. The Plan includes a mandate for temporary "last resort" on-site sheltering at Ramirez Canyon Park should relocation from the Park be determined to be more dangerous than remaining on-site. Additional discussion of emergency fire shelters is further described in detail below.

f. Emergency Fire Shelters

In order to address fire safety concerns associated with wildfire scenarios that would not allow enough time to safely evacuate the Plan area, the Plan specifies that Ramirez Canyon Park shall have an emergency fire shelter(s) capable of accommodating the largest assembly of persons on-site allowed under the Plan (250 persons). The Peach Building and the Ranger/Maintenance Supervisor Residence would be remodeled and retrofitted to provide a safe and temporary "last resort" on-site sheltering should relocation from the Park be determined to be more dangerous than remaining on-site.

For all other park sites, emergency fire shelters would be optional and are identified on the project plans. The shelters are not considered a crucial component of fire protection planning at the other parks due to the location of the camping areas' relative proximity to highways and/or roadways, as well as in consideration of the other fire protection components of the Plan. These shelters are considered optional and would only be installed if required.

The optional emergency fire shelters are proposed at the following locations:

- West of Murphy Way Road, trail 2a6
- Corral Canyon Park, east of Corral Canyon Road, trail 13b
- Corral Canyon Park, Camp Area 1
- Malibu Bluffs, Camp Area 3
- Malibu Bluffs, Camp Area 4 (2 total)

The proposed optional emergency fire shelters would be constructed with Timbercrete, or an equivalent cement-based building product, and would have a Fire Resistant Level (FRL) of 240/240/240 during tests conducted on a single skin wall (190 millimeters [mm] to 200 mm thick), which is the highest fire rating. Each structure would have a triple-pane, triple-glazed fire resistant glass window (or equivalent), an insulated fire resistant door with a RFL -/240/30 (or equivalent), and a fire resistant spy hole with glass similar to the window (or equivalent). Proposed shelters would range in size from 11.8 ft by 10.5 ft to a maximum of 12 ft by 16 ft, with heights of approximately 10.5 ft. To provide the most conservative analysis, the larger size shelter was used for purposes of identifying impacts. The 11.8 ft by 10.5 ft structures would hold a similar number of people as the 12 ft by 16 ft structures; though more sitting room would be available in the larger structures. The shelters would be painted with ignition resistant paint colors that are earth-toned, camouflage, or otherwise compatible with the existing landscape. Directions for the use of the shelters would be located on the interior and exterior of each structure which would describe what the shelter is, and when and how it should be used. The shelters would be available for use by anyone and would not be locked; instead, signs would be posted indicating that there would be penalties for inappropriate use. In most situations, it would be anticipated that the assigned wild-fire trained camp host and/or park ranger would instruct park guests to either evacuate the park or enter the fire shelter based upon the best available information and judgment of that professional. The proposed optional emergency fire shelters would be equipped with an air tank, similar to what fire-fighters use, that could be turned on as a fire storm approached the shelter. The air tank would slightly pressurize the fire shelter forcing excess cooler air out around the small gaps surrounding the fire resistant door, which would prevent smoke or harmful gases entering the fire safe shelter. The tank would be sufficient to provide fresh air for all occupants during the danger period of the fire storm.

g. Fire Truck Storage Sheds

The Plan includes two Fire Truck Storage Sheds, which would be unmanned, enclosed steel structures, located on a concrete slab, and utilized for the parking of fire engines and/or housing miscellaneous fire protection equipment. The Fire Truck Storage Sheds are proposed at Corral Canyon Park Parking Area and Malibu Bluffs Parking Area 1. The Corral Canyon Park and Malibu Bluffs locations were identified by MRCA staff as appropriate sites for the Fire Truck Storage Sheds because sufficient room was available at these locations and because they are strategically located near Pacific Coast Highway for ready access by either on- or off-site MRCA rangers and wildfire trained specialists in need of MRCA-authorized use of fire fighting vehicles and/or equipment. The Fire Truck Storage Sheds would be metal structures, approximately 40 ft by 15-ft and 12-ft high, and would be assembled on site using bolts that would connect the metal sections. After assembly is complete, the door would be bolted to the structure. The fire trucks, which could be located within the Fire Truck Storage Sheds at Corral Canyon Park and Malibu Bluffs, are intended to service parklands owned and/or managed by the Conservancy/ MRCA. The primary first responders to City/County

Parks and residential areas for medical and fire emergencies would continue to be the responsibility of LACFD.

h. Ramirez Canyon Structural Retrofits

The Plan identifies a number of features which would be utilized as a guide for retrofitting designated structures intended to be utilized as emergency fire shelters at Ramirez Canyon Park (Phase 1: Ranger/Maintenance Supervisor Residence and Phase 2: Peach Building). For all other habitable structures, as the Ramirez Canyon Park is a State-owned property, any requirements for upgrades and/or retrofits to existing structures would be determined by CAL FIRE.

4. Shade Trees and Screening Vegetation

Shade trees and screening vegetation would be planted where appropriate throughout the Plan area. Shade trees may be planted at Corral Canyon Park Camp Area 1 to provide cover from the sun, and screening vegetation may be used to shield views of parking lots at Malibu Bluffs from PCH, where such plantings would not substantially block bluewater views across the site, and sugarbrush may be planted between campsites to provide moderate shielding for campers.

Trees and vegetation would be hand-watered using new proposed water sources and would be selected from a list of locally native species. Shade trees planted may include Coast live oak, Sycamore, Sugarbush, Willow, Alder, and/or Walnut. Screening vegetation may consist of Coast live oak, Sycamore, Sugarbush, Willow, Alder, Walnut, Toyon, Lemonade berry, and/or Coffeeberry. All plant species listed above have been approved by the LACFD for use in fuel modification zones, with the exception of Willow trees.

5. Sign Program

The proposed Plan includes development and implementation of a uniform sign program for new trail and park area improvements to assist visitors in locating and recognizing park areas and trail corridors, park support facilities, sensitive habitats, and adjacent land uses. Signs are proposed to be posted along roadways and at/near park access points, trailheads, parking lots, road crossings, and linkages or intersections with other trails or roads, and would include entrance signs, park regulation/ notification signs, educational/ interpretive, and safety signs, including, but not limited to, road crossing signs and yield/warning signs on multi-use trail segments.

The sign program includes posting regulatory signs at park entrance areas, staging areas or gathering points with the following information: 1) permitted/prohibited uses of the area or facility being posted, 2) general park regulations, 3) general regulations at jurisdiction boundaries, where applicable, 4) regulations required to promote safe use of an area (including limitations on fires) and resource protection, and 5) identification of private property boundaries. Trail signs posted for visitors beyond the trailhead would

include information regarding distance to destination points, locations of services and/or support facilities, trail conditions, and trail accessibility that would help visitors determine the level of trail difficulty. Trail signs would also be posted at road crossings notifying hikers and other trail users to exercise caution in crossing the road and to be aware of and yield to on-coming traffic. In areas containing environmentally sensitive habitat or safety hazards, signs would be posted in English and in Spanish with a description of the sensitive habitat or safety hazard. In addition, educational/interpretive signs would be posted in public use areas adjacent to ESHA to identify natural resources and explain their special nature or role in the local ecosystem.

6. Utility Trenches and Grading

The joint utility trenches would have two to three different utilities laid in them and would be approximately 3 ft wide and 4 ft deep. The individual utility trenches would only have a single utility laid in them and be approximately 2 ft wide and 3 ½ ft deep. The trenches would be dug after rough grading is complete using a backhoe with a narrow bucket. The utilities would then be laid and the trenches would be backfilled before final grading, paving and landscaping begin. Utility construction typically occurs simultaneous with grading or before. If the utility is dependent upon the grading, then utility construction may occur after grading. For utilities in trails, the trails would be rough graded first, utilities installed, then finish graded. In addition to the provision of water at or near each campsite, electricity would be provided to each campsite (installed within the project trail corridors) for the use of electrical hotplates and/or griddles for cooking (note: cooking within the Plan area would not be allowed with any open flame, including propane stoves).

The Plan identifies a maximum earthwork quantities associated with proposed improvements. To allow for flexibility during the final design stage of the projects, the maximum quantities are based on concept/preliminary design estimates for cut and fill numbers, plus a 20% contingency.

7. Ramirez Canyon Park

For Ramirez Canyon Park, two (2) separate phases have been identified for implementing the proposed Plan's park improvements, uses and associated use limitations.

a. Ramirez Canyon Park Phase I Uses and Improvements

Phase 1 improvements and uses for Ramirez Canyon Park continues existing baseline uses at the park with only minor new improvements, including retrofit of the Ranger/Maintenance Supervisor Residence as a fire shelter, and passive recreation-related improvements. If required by CALFIRE, miscellaneous Phase 1 improvements to the Barwood, Peach House, Art Deco, and Barn structures may be implemented, focusing on providing building ignition resistance and prevention of ember intrusion. Each structure would be retrofitted with monitored interior sprinklers for fire suppression

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and new hydrants would be installed at the park. Existing administrative office uses and current small events (e.g., public outreach, meetings, etc.) would continue under Phase 1. Road improvements along Ramirez Canyon Road and Delaplane Road would occur under Phase 1, if required by the appropriate fire agency.

Phase 1 would also include installation of picnic tables that would be placed in several locations within the park (no grading), and a two-stall, self-contained restroom would be installed at the northern terminus of trail alignment 5a to replace the existing portable restroom. No improvements would be made to existing parking areas located within the Ramirez Canyon Park valley floor (a total of 54 spaces). The Ramirez Creek Restoration/Enhancement plan, discussed below, would also be implemented as part of Phase 1.

Phase 1 would also include construction of trail alignment 1a (and the Kanan Spur Trail) that would extend from Kanan Dume Road to a connection at the Ramirez Canyon Park valley-floor to trail alignment 2a3; and the associated 14-space parking areas along Kanan Dume would be constructed at this time. A short trail spur from the southerly portion of the park (trail 2a7) would be constructed to connect to the proposed Coastal Slope Trail (trail 2a3). During Phase 1, gates and fencing would be installed in the Park to direct trail users to stay on the trails, with signage notifying trail users to not enter facilities, including on-site buildings/ offices at the Park.

Phase 1 specialized programs and use limitations for Ramirez Canyon Park include the following:

- All Ramirez Canyon Park uses, including administrative and operational uses, public outreach, events, gatherings, tours, and workshops, etc. shall be limited in size, duration and occurrence to comply with the proposed maximum of 80 total trips/day (including both inbound and outbound trips) on Ramirez Canyon Road.
- Public outreach and education activities are priority uses and shall be accommodated first within the maximum allowed 80 trips/day for Ramirez Canyon Park uses.
- Events, tours, or other special functions permitted at Ramirez Canyon shall be cancelled when any National Weather Service red-flag warning for extreme weather, fire and/or flooding warning is issued. Written warnings of such policy shall be provided to prospective sponsors prior to contracting for park use.
- Amplified music shall only be provided in the areas located immediately in front of and behind the Barn facility and at no time shall amplified music be audible beyond the property boundaries adjacent to residential development. In addition, event monitors on duty during such events shall check sound levels hourly at the site boundaries nearest adjacent residential development and shall immediately ensure volume reduction to achieve this standard should it be exceeded. Amplified music shall not be allowed anywhere on the subject site after 8:00 p.m. Sunday through Thursday evenings or after 10:00 p.m. on Friday or Saturday evenings. Special

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event sponsors shall be provided written notice of these amplified music restrictions prior to entering into a contract for rental of the Barn facility.

- Special programs held during the fire season shall retain all guest vans, shuttles, and drivers continuously on site during the event. Additional vehicles shall be provided, as needed, onsite at Ramirez Canyon Park so that there would be enough vehicular capacity to relocate all persons on site for any event in one trip out.
- Specialized programs permitted at Ramirez Canyon Park and associated support facilities shall consist of the following uses and be limited by the following restrictions:
 - Administrative offices for the Conservancy and MRCA, with an on-site office/administration population not exceeding 15 staff persons.
 - Ranger/maintenance supervisor residence utilized by MRCA staff charged with security, site management, and public safety duties.
 - Public improvements for the riparian area interpretive trail and picnic facilities designed specifically to provide facilities and amenities required for the safe use of the trail by physically challenged visitors in compliance with Americans with Disabilities Act (ADA) requirements, including trails, picnic facilities, drinking fountains, and restrooms.
 - Use of the Peach House and Barn facility for small group gatherings and tours for up to 40 participants each, and to a limited extent the Art Deco facility may be used to greet guests or as a component of site tours, but not as a primary site for group functions.
 - Continuation of existing small events (e.g., public outreach, meetings, etc.).
 - Placement of picnic tables at the park.
- A Transportation and Parking Management Plan is proposed to manage traffic trips on Ramirez Canyon Road and includes the following elements:
 - Agreements shall be secured and maintained between the Conservancy/MRCA and willing providers of offsite parking resources to accommodate any necessary additional parking demand associated with the authorized Phase 1 uses of the park without displacing the current parking needs of the provider.
 - No off-site public coastal access parking, including the Winding Way Trailhead parking lot and the proposed parking facilities at Escondido Canyon Park, shall be utilized to satisfy the off-site parking requirements associated with Ramirez Canyon Park use.
 - Daily vehicle trips associated with all authorized uses of Ramirez Canyon Park are restricted to a maximum of 80 trips per day (40 round trips).
 - Signs shall be provided and maintained at the entrance gate to Ramirez Canyon Park forbidding horn honking except in case of emergency.

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- Vans and shuttles shall minimize traffic trips on Ramirez Canyon Road by traveling with maximum passenger capability and in convoys, whenever feasible.
- An Event Monitoring Program is proposed and includes monitoring reports to be submitted to the Executive Director of the Coastal Commission annually. The monitoring reports shall include a summary of the number and kind of events, tours, small gatherings, and outreach programs conducted at Ramirez Canyon Park during the annual reporting period, distinguishing revenue-generating and non-revenue generating events, activities, tours, and outreach programs, and specifying the dates, vehicle trip counts, and event sponsor or beneficiary as applicable, for each.

b. Ramirez Canyon Park Phase 2 Uses and Improvements

Phase 2 Ramirez Canyon park improvements and uses would implement a full complement to Phase 1 specialized programs and uses, which are intended to further facilitate unique access opportunities for visitors with disabilities, and to provide a variety of recreational and educational opportunities for persons of all ability levels, while continuing to provide for essential administrative support facilities. Phase 2 includes all of the Phase 1 programs and uses and also includes structural retrofits to the Peach House to be used as a fire shelter, two new accessible campsites, new parking improvements, new improved accessible day use areas, new restrooms, as well as large special events (sixteen (16) 200-person events per year). If required by the appropriate fire agency, road improvements to Via Acero would be associated with the implementation of Phase 2 improvements.

Phase 2 improvements and uses for Ramirez Canyon Park would continue all the park uses and limitations included in Phase 1, and would include additional specialized programs, park improvements and uses and associated use limitations as follows:

- Special programs/events held during the fire season shall retain all guest vans, shuttles, and drivers continuously on site during the event. Additional vehicles shall be provided, as needed, onsite at Ramirez Canyon Park so that there would be enough vehicular capacity to relocate all persons on site for any event in one trip out.
- Net proceeds or \$1,000 per large event, whichever is greater, generated by special events held at Ramirez Canyon Park shall be used to establish and maintain a fund for purposes of funding access and recreational improvements and opportunities for visitors with diverse abilities, disadvantaged youth, or other underserved groups. The fund shall specifically serve to implement a program designed for disadvantaged youth and dedicated to teaching first-time campers proper use of camping equipment, environmental awareness and outdoor leadership skills. The camp program shall include all necessary transportation, food and equipment, with staffing provided by professional naturalist educators who are trained in first aid, youth leadership and outdoor education. See description of special event uses below.
- Administrative offices for the Conservancy and MRCA.

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- Public Outreach, Events, Gatherings, Tours, And Workshops
 - Public Outreach Programs
 - Year-Round, Permitted 7 Days/Week
 - Maximum 40 Participants (with an additional 20 staff on-site)
 - 8:00 AM – Dusk
 - Minimum 10 Outreach Events Conducted Per Month at Ramirez Canyon Park, Escondido Canyon Park or Corral Canyon Park, 5 of which shall be conducted at Ramirez Canyon park (except when precluded by public safety concerns)
 - Tours And/Or Small Gatherings
 - Year-Round, 12 Tours or Gatherings Permitted/Month
 - Maximum 40 Participants (with an additional 20 staff on-site)
 - 8:00 AM – Dusk
 - Special Events (gatherings of participants/ guests numbering more than 40)
 - March – October, 16 Events Permitted/Year, 1 Event Permitted/Week
 - Maximum 200 Participants (April 1 through July 31) (with additional 50 staff and employees of service providers)
 - Maximum 150 Participants (March 1 through March 31 and August 1 through October 31) (with additional 50 staff and employees of service providers)
 - 8:00 AM - 9:00 PM Sunday-Thursday, and 8:00 AM to 10:00 PM Friday and Saturday, One Additional Hour is Allotted for Personnel Clean-Up and Securing the Facility.
 - Additional day-use picnic areas designed specifically to provide park amenities to accommodate disabled visitors and their families by reservation. The accessible day-use picnic areas shall be located in level, previously disturbed areas so as not to adversely impact sensitive habitat, but shall be located in proximity to natural areas to provide association with natural resources to the maximum extent feasible.
 - ADA accessible camp facility designed specifically for use by visitors with disabilities and their families, available by reservation.

c. Kanan Dume Parking Improvements to Serve Ramirez Canyon Park (Phase 1)

The proposed Plan includes development of a trail linkage from Kanan Dume Road to Ramirez Canyon Park. Details of the proposed trail linkage are discussed above in a limited capacity and in greater detail in the Trail section above (Kanan Dume Ramirez Canyon Connector Trail). A proposed parking facility accessed from Kanan Dume Road

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would provide a new public parking resource to accommodate 14 vehicles (including 2 accessible spaces). The parking facility has been located and designed as pocket parking immediately adjacent to Kanan Dume Road. Development of the proposed Kanan Dume parking areas would require construction of retaining walls along the eastern flank of the proposed parking areas. Informational and regulatory signage would be installed at the parking lot entrances. Additional striping and lanes are proposed along Kanan Dume Road to facilitate access to these parking areas. The Kanan Dume parking areas are considered a "Phase 1" improvement and would be required to be operational in advance of any public use of the proposed Trail Alignment 1A and/or Kanan Spur Trail.

d. Ramirez Canyon Park Parking & Day-Use Areas

Phase 1 would include placement of picnic tables throughout the seven day use areas at the park (no grading). Phase 2 involves improvements three of the day use areas and conversion of one to an accessible campsite in the southerly portion of the park (Camp Area 1) to meet to standards for accessibility. (In Phase 2, this includes two accessible day-use/multi-purpose use areas.) An adjacent parking area (existing) would be improved. In Phase 2, these areas would be improved with picnic amenities and the periphery of the areas revegetated with native plants to enhance the visual quality and habitat of the currently degraded site areas.

During Phase 2 of the implementation of improvements at Ramirez Canyon Park, a new single restroom facility meeting the specifications for accessibility would be provided east of an existing parking lot (Area 1-A), which would be restriped and reconfigured as part of that phase; the restroom would be connected to the Park's existing advanced wastewater treatment system. The Area 1-A parking lot, located at the southern entrance to the park, would be improved during Phase 2 construction to provide 8 standard and 2 accessible spaces, for a total of 48 parking spaces available on-site. There would be a total of seven (7) day-use areas in Phase 1 and six (6) day-use areas in Phase 2 (as a result of one day-use area converted to campsite); half of the Phase 2 day-use areas would be designed to be accessible. As indicated above, during Phase 2, Parking Area 1-A would be restriped/ reconfigured for accessibility.

The proposed accessible day use area (Area 4), located east of the proposed parking lot at Area 1-A in Ramirez Canyon Park would be used for parking as needed and when not in conflict with other uses. Parking Area 1-B, under the proposed Plan, would continue to be used for parking; it would not conflict with the proposed accessible day use area/multi-purpose area located to the south.

The associated day-use/picnic areas at the Meadow would provide views across the Meadow to Ramirez Canyon Creek and would be easily accessed from the proposed Kanan Dume Ramirez Canyon Connector Trail (trail alignment 1a) connecting the Park to the proposed parking facility adjacent to Kanan Dume Road. Hikers would also have

ready access to the new proposed trail (segment of Coastal Slope Trail) from Ramirez Canyon Park eastward to Murphy Way and beyond (a Phase 1 improvement).

e. Ramirez Canyon Park Camp Areas (Phase 2)

Ramirez Canyon Park camp areas would include a total 2 campsites, which would be designed to meet the technical specifications for accessibility. The camp sites would be located a short travel distance from the many existing support facilities in the Park, while maintaining adequate distance to experience the coastal canyon habitat. The sites, in addition, are relatively close to PCH (approximately one mile), with its many costal access points to the beach. Overnight camping at Ramirez Canyon Park would be allowed by reservation only. The reservation and on-site registration systems (on-site registration/ check-in would be conducted in person by MRCA Park Staff) would require campers to acknowledge and agree to all park rules including, but not limited to, the prohibition on campfires and the “cold camping” regulation.

A new camp area is proposed at the existing tennis court (100 ft by 56 ft) location, which is slated for demolition to allow for restoration/enhancement of a portion of Ramirez Canyon Creek adjacent to the area (see Ramirez Canyon Creek Restoration/Enhancement below for further discussion). Two small Type 2 campsites are planned in a level, previously disturbed area of the Park (i.e., the tennis court). The area was chosen given the availability of vehicular access to each site and the sites location near existing, easily accessible support facilities. A new single restroom facility meeting the technical specifications for accessibility would be provided south of the campsites, which would be connected to the Park’s existing advanced wastewater treatment system. These improvements are considered a “Phase 2” improvement.

f. Ramirez Creek Restoration/Enhancement

The Plan proposes restoration within Ramirez Canyon Park with the intention of enhancing degraded stream habitat and addressing flood and erosion hazards in a channelized stretch of Ramirez Creek. The proposed Plan would restore, create, and enhance segments of Ramirez Creek that bisects the park and which sustained historic impacts associated with creek bank and channel modifications from a previous property owner.

Based upon a Riparian Habitat Evaluation study (LSA Associates, 2002), unpermitted modifications in the subject stretch of Ramirez Creek, such as the installation of rock walls and gabion structures, had occurred subsequent to the effective date of the Coastal Act (January 1, 1977). The study estimates that these unpermitted modifications totaled approximately 0.18 acre of historic impacts to southern willow scrub. With the installation of unpermitted gabions and hard structures along the creek, stream flow rates increased due to the loss of infiltration, loss of sediment along the creek bank, and loss of dissipation by vegetation growing along the creek channel. The

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proposed Plan includes restoration/enhancement of the stream channel and mitigation, at a 3:1 ratio, for those historic impacts.

The Conservancy and MRCA have conducted a site-specific analysis of the modified stream channel at Ramirez Canyon Park to assess opportunities for streambed and riparian habitat restoration/enhancement and potential onsite and offsite flooding or erosional hazards that might result from removing or other modification of the channelization structures. A variety of creek bank treatments were evaluated for the stream restoration project including total naturalization of the creek bank and/or utilizing a combination and natural and hard structures to accomplish the restoration.

The proposed stream restoration/enhancement project includes restoration of creek areas where bank protection is not required for flood protection of existing structures/public use areas and where creek restoration will benefit the hydrology of the stream corridor and fish and wildlife habitat. The proposed plan includes removing existing gabions and gunite in creek bottoms to restore soft channel bottom and installing pervious boulder berms and/or log deflection structures throughout the creek to control stream degradation; creating areas of overbank enhancement in two areas (by the existing tennis court and at the southerly portion of the park) by removing walls and a pedestrian bridge, grading back the slopes, and removing non-native plants and planting native plants. The creek enhancement areas would also provide for educational displays associated with restoration and enhancement efforts. A tennis court and rock retaining wall, as well as an upland grass pathway across the creek from the tennis court, will be excavated and graded to an elevation slightly above the flow line of the creek. At these flow-line elevations, the area will receive creek flows that can establish and support southern willow scrub habitat. Once grading is complete, southern willow scrub vegetation is proposed to complement existing vegetation communities. Laying back the slopes in these particular areas will create a larger area for surface flows to slow down, allowing the natural hydrology and sediment deposition to resume.

Upstream from the creation areas, removal of gabions and associated structures from Ramirez Canyon Creek, and the replacement of those structures with softer, more natural boulder berm structures and/or log deflection structures will facilitate restoration of the creek. Boulder berms are proposed to slow down stream flow and create rock-riffle-pool complexes within the channel, which is expected to facilitate sediment deposition and subsequent native recruitment of southern willow scrub vegetation. Several sections of the creek will be enhanced by the removal of non-native canary palms and establishment of native southern willow scrub species. The canary palms that are present range in size from several feet tall to 8 to 10 feet tall with a canopy cover of 8 feet in diameter. Palms on the creek bank to be removed will be replaced with appropriate southern willow scrub species using local willow cuttings. Southern willow scrub vegetation will be planted the created benches and banks, coast live oak and black walnut trees will also be planted on the slopes to provide transitional upland habitat.

g. Ramirez Canyon Road and Delaplane Road Widening (Phase 1)

The proposed Plan includes a preliminary design for emergency ingress/egress road improvements for the Ramirez Canyon community, proposed to be implemented during Phase 1 of the Plan. If required, actual improvements will be implemented consistent with the responsible fire agency's final design and timing requirements (based on agency jurisdiction). These preliminary design improvements include widening of the existing access road and removal of encroachments in the road easements, as necessary, to provide as great as 20-ft clearance for emergency ingress/egress in the canyon along Delaplane Road and Ramirez Canyon Road, per the initial recommendations of the LACFD. These improvements (or other similar alternative measures required by the responsible fire agency consistent with Fire Code allowances) would enhance overall vehicular access along Ramirez Canyon Road and would provide for improved emergency access to and from the Ramirez Canyon corridor. The proposed widening of Ramirez Canyon Road and Delaplane Road would occur during Phase 1, if required by the responsible fire agency.

Road widening improvements are proposed to achieve as great as a 20-ft wide roadway with minimum 50-ft radius curves at Ramirez Canyon Road to meet fire department requirements. Portions of Ramirez Canyon Road currently meet the 20-ft width roadway width, while other segments of the road would require application of additional asphalt concrete (AC) pavement along one or both sides of the road. To achieve a 20-ft width along the entire length of Ramirez Canyon Road from its intersection with Delaplane Road, 2,773 lineal feet (lf) of Ramirez Canyon Road (combined west and east side pavement additions) would require AC paving improvements. Area of improvements along the west portion of Ramirez Canyon Road would total 1,536 sf and improvements along the east portion of the road would total 7,910 sf. Similar to Ramirez Canyon Road, some portions of Delaplane Road do not currently meet the 20-ft width. As such, approximately 700 lf of Delaplane Road would require AC paving improvements (combined west and east side pavement additions); with a total of 425 sf along the west and 1,520 sf along the east road portions. To comply with fire department requirements and obtain the desired uninterrupted roadway width of 20 ft, roadway improvements of both Ramirez Canyon Road and Delaplane Road would potentially be required along approximately 74% of the combined roadways.

If required by the responsible fire agency in order to maintain adequate room for operations during an emergency incident along Ramirez Canyon Road and/or Delaplane Road, additional widening to a total road width of approximately 26 feet would occur for a length of approximately 50 feet adjacent to all existing fire hydrant locations. Because the exact requirements and location of the 50-foot-long road widening in relation to the existing hydrants has not yet been determined by CAL FIRE or LACFD, in some cases a longer length/section of road-widening was analyzed; this allows for a conservative, reasonable worst-case analysis of impacts, while providing flexibility to shift the road widening slightly in certain locations (e.g., to avoid impacts to an oak tree, etc.).

h. Via Acero Secondary Emergency Access Improvements (Phase 2)

As described above, proposed Ramirez Canyon Park uses and improvements would consist of two phases. Phase 1 continues existing uses at the park (small events/programming not exceeding the 40 guests per day, plus 20 staff, baseline) with only minor new improvements. Phase 2 would implement a full complement to Phase 1 specialized programs and uses, including the extension and widening (to 20 ft.) of Via Acero Road between Kanan Dume Road and Ramirez Canyon Park for purposes of secondary emergency access (pursuant to the initial recommendations of the LACFD and only if ultimately required by the responsible fire agency). The City of Malibu LCP specifies that options for additional Ramirez Canyon emergency ingress/egress to and from Kanan Dume Road over Via Acero Road shall be explored. Vehicle access across Via Acero would be utilized only for emergency ingress/ egress to Ramirez Canyon Park. The Conservancy/ MRCA would continue to adhere to a total 40 round trips/day standard for vehicles entering from Ramirez Canyon Road.

The Via Acero Road improvements, if required to be constructed by the responsible fire agency, would consist of extending the paved portion of Via Acero generally along the path of an existing dirt road for a maximum of approximately 1,400 ft. to intersect with Kanan Dume Road, and widening of Via Acero to a width as great as 20-ft over its entire length between Kanan Dume Road and Ramirez Canyon Road (approximately 2,904 ft). The amount of new pavement required to extend and widen the road would be approximately 30,538 and 3,157 sq. ft., respectively (a total of 40,434 sq. ft., which includes a 20% contingency). Grading for the Via Acero road improvements would consist of approximately 1,587 cu. yds. cut and 2,946 cu. yds. fill. All but a very small portion (approximately 90 linear feet adjacent to Kanan Dume) of the Via Acero Road improvements are located in the City of Malibu. A steel emergency access gate would be utilized near the Kanan Dume Road entrance, similar to those used by LACFD, California Division of Forestry, and other park agencies.

8. Escondido Canyon Park

There presently are very few support facilities at Escondido Canyon Park, with the exception of one picnic table near the park entrance. The primary public amenity at the park is the trail system through the Escondido Canyon Natural Area that leads hikers, mountain bikers, and equestrians along a 1.3 mile trail through oak woodland, riparian woodland, and coastal sage scrub habitat to the spectacular, multi-tiered 150-ft Escondido Falls—the highest in the Santa Monica Mountains. Trail facilities are the only improvements proposed at Escondido Canyon Park as part of this Plan. See the Trail Improvements section above for a discussion of trail improvements proposed within Escondido Canyon Park.

9. Latigo Trailhead and Day Use Area

The proposed Latigo Trailhead improvements, located in the City of Malibu, are intended to support access and recreation in Escondido Canyon and the surrounding trail network. A parking area, day-use picnic areas, a self-contained single-stall restroom, and trail improvements are proposed. The Plan includes development of a new approximately 500 sq. ft. parking facility for 4 vehicles, including one accessible space. The parking facility is proposed adjacent to Latigo Canyon Road and would involve limited grading (85 cu. yds. fill) and construction efforts. To control access to the site when the Latigo Trailhead and Day Use Area is not open to the public, the parking facility includes a metal swing gate across the driveway to restrict entrance. A day use/picnic area with approximately three picnic tables is planned adjacent to, and would be readily accessed from, the proposed parking area. An accessible 4-ft wide trail would allow access from the parking area to the upper promontory with four additional day/use picnic sites and a self-contained single-stall restroom. The restroom area would also involve limited grading (30 cu. yds. cut) and brush clearance for fire safety purposes (20 ft.).

10. Corral Canyon Park

a. Corral Canyon Park Parking Improvements, Accessible Walkway and Drop-Off Area

A number of existing support facilities exist at the Sara Wan trailhead located within Corral Canyon Park that currently facilitate public use of the park including a public parking lot, self-contained restroom, drinking fountain, and an accessible picnic area. However, access options for visitors with special needs beyond the trailhead are limited in that the trail immediately requires visitors to cross the creek to continue along the trail.

The proposed Modified Redesign Plan includes an accessible drop-off point on the opposite side of Corral Canyon Creek from the existing parking lot and trailhead where an existing administrative road currently takes access from PCH. The existing maintenance road (located east of Corral Canyon Creek) would be upgraded to provide for one drop-off point from which visitors with special needs could gain access to the rest of the park. Given the proximity of this area to the creek, the improvements would consist of leveling the already disturbed area and providing adequate dimensions for vehicle turnaround. In addition, the proposed Plan includes improvements to an existing trail and walkway partially along PCH to provide access for people with disabilities from the existing Corral Canyon Park parking lot to the proposed accessible drop-off point. Park staff with an All-Terrain-Vehicle (i.e., mechanized mule) would be available for pre-arranged drop-offs to Camp Area 1, when necessary.

A two-stall restroom would be installed immediately to the east of the proposed Park Administration/ Employee Quarters building. A proposed Fire Truck Storage Shed (675

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sq. ft.) would be located immediately to the east of the proposed Park Administration/ Employee Quarters building and restroom facilities.

The existing trailhead parking facility at Corral Canyon Park would be restriped and a vegetated island would be converted to a decomposed granite parking area; existing and proposed parking would total 34 spaces.

b. Corral Canyon Park Camp/ Day Use Areas

The proposed Plan includes a Park Administration/ Employee Quarters building (approximately 600 sq. ft.) at the Sara Wan trailhead, located north of the existing restaurant fronting on PCH and one camp area in Corral Canyon Park that would include a total of 17 campsites.

Camp Area 1 is planned on an elevated terrace above PCH and would include 12 large campsites and 5 small Type 1 campsites, and a self-contained double-stall restroom meeting the technical specifications for accessibility; the trail from the existing parking area to this camp area would also be improved for accessibility. Camp Area 1 would be located along and adjacent to the existing primary trail alignment in the southern portion of the Park. The northern day use/ picnic area (Day Use Area 2), located northwest of Camp Area 1, would include picnic tables and is also proposed along the primary trail alignment, just up-canyon of the trailhead. Overnight camping at Corral Canyon Park would be allowed by reservation and/or by on-site registration (e.g., by an on-site Camp Host or Park staff only). A board or kiosk at the parking area would designate which campsites have been reserved. The reservation and on-site registration systems would require campers to acknowledge and agree to all park rules including, but not limited to, the prohibition on campfires and the “cold camping” regulation.

Approximately 2,800 ft of 4-in. and/or 6-in. water lines would be extended from the PCH right-of-way to the Corral Canyon Park site, which would provide potable water to the proposed Camp Area 1 as well as the Park Administration/ Employee Quarters building. In addition, approximately 2,600 feet of separate 4-in. and/or 6-in. waterlines would be extended from the PCH right-of-way to the Corral Canyon Park site for fire protection purposes, servicing a 10,000 gallon water storage tank and Camp Area 1. Approximately 200 ft of 4-in. water lines would be extended from the PCH right-of-way to the Corral Canyon Park site, which would provide firewater to the proposed Park Administration/ Employee Quarters building. Approximately 1,300 ft of dry utility lines would be installed within trenches adjacent to the proposed waterlines in order to provide electricity to Camp Area 1 hospitality/ cook stations as well as electricity, phone, and cable to the Park Administration/ Employee Quarters building.

In addition to the wildland fire hydrants proposed for the camp area, which would be serviced by the proposed fire waterlines, a 10,000 gallon water tank (with water obtained from municipal supplies) would be available as a back-up emergency supply of water for fire protection purposes. The 10,000 gallon water tank is proposed to be

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located north of the southern Camp Area 1 and east of the day use/ picnic area. A 2 ft by 4 ft steel box with motorized portable water pump and connection hoses would be located within the central cluster of campsites at Camp Area 1 that would serve to boost wildland hydrant system water pressure, if necessary. The approximate 20-horsepower portable water pump can achieve a pressure of 150-325 pound per square inch (psi) at 120 gallons per minute (GPM). This would be utilized as a third level of wildfire defense; water from the water tank and wildland fire hydrants, and water pumped from a fire truck would be the first defense options. It would be refueled on an as-needed basis and would be checked approximately four (4) times per year to confirm that it operates properly.

Waterline and dry utility placement would generally be located in existing/proposed trail corridors. Wet and dry utilities would be extended approximately 240 ft from PCH to the Park Administration/ Employee Quarters building; the area of disturbance is currently paved.

11. Malibu Bluffs Conservancy Property

Malibu Bluffs Conservancy Property (Malibu Bluffs) contains few support facilities with the exception of limited trailhead improvements (signs, trash receptacles) at key entry locations into the property and picnic areas, although picnic areas, restrooms, sitting benches, and other active recreation areas can be accessed on the adjacent City-owned Malibu Bluffs Park. An existing parking lot at the City-owned Malibu Bluffs Park is shared between the City and Conservancy/MRCA. The Conservancy-owned park contains approximately 2.3 miles of existing trails that traverse the bluff, and with up-coast and down-coast ocean views. Trails also descend to Malibu Road, where a number of vertical beach access easements exist and are open to the public across, providing year-round access to the beach.

a. Malibu Bluffs Parking Improvements

The proposed Plan includes development of two new parking areas on the Bluffs property, all of which are accessed from, and adjacent to, PCH. The first parking area (Parking Lot 1) is proposed on the west bluff portion of property and would accommodate 26 vehicle spaces, including 3 accessible spaces, within approximately 5,325 sq. ft.

Two Park Administration/ Employee Quarters buildings (approx. 600 sq. ft. each) and a single self-contained restroom are proposed in the southwest corner of the overflow parking area.

Immediately east of the Park Administration/ Employee Quarters building, within the overflow parking area, a Fire Truck Storage Shed (675 sf) is proposed. Parking Lot 1 includes a "flex-area," which would allow the Conservancy/ MRCA to utilize an approximate 200 sf area which would be striped for parking for parking and/ or for the installation of one (1) storage shed/ enclosure, which would house park administration

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equipment and supplies. The storage shed(s) would consist of shipping storage container-type construction, with metal siding and roof, painted earth tone colors, with no greater dimensions than 16 ft (length) by 12 ft (width) by 12 ft (height). The construction period, methods, and equipment required to construct the pad would be the similar to that required for the optional emergency fire shelters.

A 10 in. or 12 in. water mainline would be extended within PCH to provide 4 in. lateral water service to both Parking Area 1 and Parking Area 3. The water main line would be extended approximately 370 lineal feet from the northwest corner of the property to Parking Area 1, with an estimated 1,000 lineal foot extension of the mainline from the northeast corner of the property to Parking Area 3. Dry utilities such as electricity, phone, and cable would be provided to the Park Administration/ Employee Quarters buildings.

A fire hydrant would be provided within each parking area. In addition, a 10,000 gallon water tank is proposed adjacent to the northern border of Parking Area 1. A camp host site and double-stall restroom are proposed along the east side of Parking Area 1 and off the trail from the parking lot to the proposed Camping Area 1.

Parking Area 3 would be located on the east bluff portion of the property. The lot would be approximately 6,980 sf and would include 14 vehicle spaces, including 3 accessible spaces. A camp host site and a second 10,000 gallon water tank are proposed just south and west, respectively, of Parking Area 3; a single restroom would be located adjacent to the eastern border of the this parking area.

All parking areas would have bike racks installed. Each water tank would be equipped with an adjacent standpipe or port for fire agency hook up.

On the western side of the property, an approximate 45-ft wide driveway apron would connect to PCH; a 20-ft wide access road would serve Parking Area 1/ Camp Area 1. A pedestrian bridge, located off the Parking Area 1 entry driveway hammerhead turnaround, would cross an unnamed drainage to the east and provide access to Camp Areas 2A and 2B.

In the north-central portion of the property, an approximate 80-ft wide driveway apron connecting to PCH would connect to an approximate 20-ft wide access road serving Parking Lot 3 and Camp Areas 3, and 4. A 10-ft wide access road, which tapers to 8 ft wide, would be installed south of Parking Lot 3 for emergency and service access to Camp Areas 3 and 4. A double-sided park entrance sign would be provided at each park entrance at PCH.

b. Malibu Bluffs Day Use and Restroom Areas

A new day use/picnic area is proposed on Malibu Bluffs. The new day-use area would be located on the lower portion of the east bluff. The proposed day use area would be

improved with picnic amenities and would be accessed from Malibu Road or the upper east bluff via an existing trail. In addition, a two-stall self-contained restroom facility would be located along Malibu Road would be accessed from Malibu Road or from the new trail connections proposed between Camp Area 1 and Camp Area 4. The restrooms would be located in immediate proximity to the existing vertical accessway to the beach located across the street.

c. Malibu Bluffs Camp Areas

The proposed Plan includes 4 camps areas for the Malibu Bluffs area that would include a total of 35 campsites, 20 of which would be designed as large campsites. Camp Area 1 would consist of 4 small type 1 campsites and 6 large campsites located near the proposed Parking Area 1 on the west bluff portion of the property. A single restroom meeting the technical specifications for accessibility would be located by Camp Area 1. Camp Area 2 would include 6 small type 1 campsites and 5 large campsites located on the west bluff, east of the ravine and across the pedestrian bridge, plus a restroom meeting the technical specifications for accessibility. Camp Area 3 is proposed on the northeast bluff portion of the property and would include 5 large campsites, plus a restroom meeting the technical specifications for accessibility. Camp Area 4 is proposed on the southeast bluff portion of the property and would include 5 small type 1 campsites, 4 large campsites, plus a restroom meeting the technical specifications for accessibility. Overnight camping at Malibu Bluffs would be allowed by reservation and/or by on-site registration (e.g., by an on-site Camp Host or Park staff only). A board or kiosk at the parking area would designate which campsites have been reserved. The reservation and on-site registration systems would require campers to acknowledge and agree to all park rules including, but not limited to, the prohibition on campfires and the “cold camping” regulation.

At the southwestern corner of the property, east of the proposed Malibu Road Restroom Area, a pedestrian bridge would cross an unnamed drainage approximately 50 ft north of Malibu Road; the bridge would span the drainage and no improvements within the drainage are anticipated. As described under Malibu Bluffs Parking Improvements, a pedestrian bridge is proposed across an unnamed drainage between Camp Area 1 and Camp Area 2. A pedestrian bridge would also be constructed in the central portion of the property, between Camp Area 2 and Camp Area 3, as well as one along an exiting trail in the northeastern corner of the property that would connect the existing parking lot at Malibu Bluffs Park to the proposed Parking Area 3 on the Conservancy-owned Malibu Bluffs property.

12. Trail Improvements

The proposed Plan would construct major components of an expansive trail system planned for the Malibu coastal area and the larger Santa Monica Mountains National Recreation Area, thus connecting a number of federal and state-owned parklands in the Plan area including Ramirez Canyon Park, Escondido Canyon Park, Latigo Trailhead, Solstice Canyon Park, Corral Canyon Park and Malibu Creek State Park. See Table 4

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for a summary of these proposed trail improvements, which are also discussed in greater detail below.

The Plan includes a program for accepting and implementing recorded trail Offers To Dedicate (OTD) in the Plan area to fill a number of “missing links” in the surrounding trail network. In an effort to keep up with existing and increasing demand for recreational resources in Malibu and the Santa Monica Mountains coastal area, the California Coastal Commission has for decades implemented the Coastal Access Program OTD program in the Plan area. The OTD program has resulted in a number of trail easements located along local roadway shoulders that would provide trail linkages from the surrounding street network and the community to the regionally significant Coastal Slope Trail and, ultimately, to the Beach to Backbone Trail. However, the OTDs must be “accepted”, and improved as necessary, by a managing agency to ensure that the intended public benefits are effectuated.

The MRCA has accepted many of these trail OTDs within the Plan area; however, because there remain substantial gaps between the accepted OTDs along the planned trail alignments, improvement and use of these OTDs are not included in the environmental analysis for the proposed project. The current, incomplete condition of the trail alignment OTDs renders detailed analysis of anticipated trail improvements (e.g., engineering and natural resource constraints) speculative at this time as it is not known exactly where potential future trail OTDs would be located on adjacent and nearby properties in the future. The MRCA will continue to accept new and future trail OTDs in the Plan area as they become available, and will improve and implement them when possible and appropriate as OTDs are secured and accepted for complete, continuous trail alignments, an equivalent self-contained segment, or if public need arises for implementation of a particular trail segment. The detailed planning and implementation of these OTDs would be undertaken with applicable environmental review conducted at that time.

In addition, the Plan includes planning and implementation efforts to connect several federal and State-owned park properties via the proposed trail system; Ramirez Canyon Park, Escondido Canyon Park, the Latigo Trailhead property, Solstice Canyon Park, Corral Canyon Park, and Malibu Creek State Park. The majority of planned trail connections to and between the parks are included in the proposed project. However, a single trail segment planned between Kanan Dume Road and Zuma/Trancas Canyons in the Santa Monica Mountains National Recreation Area is located on NPS land, and the Conservancy/MRCA do not currently have land tenure or agency agreement to plan and implement trail improvements in this location. As with the trail alignments that would ultimately be established through the OTD program discussed above, detailed planning and implementation of the planned trail segment to connect Kanan Dume Road and Zuma/Trancas Canyons would be undertaken with applicable environmental review conducted at that time.

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The proposed trail improvements would complete trail connections for the Coastal Slope Trail and its ultimate connection to the Beach to Backbone Trail (in Corral Canyon), which would provide access to and between adjacent urban areas of Los Angeles and Ventura Counties, the larger Santa Monica Mountains National Recreation Area, and to the shoreline within the City of Malibu, as illustrated in Figure 7, Planned Trail Resources and Figure 8, Proposed Trail and Park Resources. Additional parkland and shoreline access would be provided with the Beach to Bluffs trail improvements proposed at the Conservancy-owned Malibu Bluffs.

Some of the trail alignments identified in the Plan area are critical connections for completing the Coastal Slope Trail and would require either new land acquisitions from private and public property owners or new OTDs for formal public access trail easements (e.g., Trails 1a, 9a/b, 10b, and 11a). For these trail alignments, additional properties and/or trail easements and/or agency agreements would need to be secured by the Conservancy/MRCA before the trails could be constructed. Once the land is acquired, or the trail easements accepted, all policies and implementation measures of the Plan and construction techniques described herein would be applied to implementation of proposed trail improvements.

Standard trail construction techniques would be incorporated where retaining structures are required for trail construction. For low walls (i.e., 2-ft tall walls), materials such as trees, logs, or rocks would be placed to support the soil. Walls up to 3-ft would be constructed from steel posts driven into the ground with boards adjacent to the posts to retain soil; to ensure free drainage from behind the wall, filter fabric and gravel would be applied. Support for taller slopes would require CMU on top of a concrete foundation. To ensure slope and site stability, final design and grading of trails, as well as the retaining structures, would be in conformance the findings of a geotechnical report's recommendations. The Plan includes trails proposed in accordance with current accessibility guidelines and technical requirements. Proposed accessible trails connect with other proposed accessible facilities, including campsites, restrooms, and parking areas.

Many of the proposed trail alignments (Coastal Slope Trail and feeder trails) generally follow the alignments in other planning documents, including City of Malibu-Malibu Trails system (2004), City of Malibu Local Coastal Program, and the Draft Santa Monica Mountains National Recreation Area (SMMNRA) Interagency Trail Management Plan. The majority of the new trails are proposed to be 5-ft wide, in some cases they are proposed to be 4-ft wide, and they would include periodic passing areas. Along many of the proposed trail segments, bridges across drainages would be provided. In addition, signage would be installed, including regulatory, directional, and educational signage.

a. Coastal Slope Trail and Beach to Backbone Trail

The proposed Coastal Slope Trail is a regionally significant trail that is identified along the length of the Santa Monica Mountains from Point Mugu State Park in the west to

Topanga State Park in the east, and consists of existing and proposed segments along then various stretches of the trail system. The Draft SMMNRA Interagency Trail Management Plan identifies an alignment of the Coastal Slope Trail. Specific alignments that would be implemented along its length may vary slightly from planned alignments due to site-specific considerations (including topographic or environmental constraints, new trail easements from private landowners, etc.). The Plan covers a segment of the Coastal Slope Trail from Kanan Dume Road at the west to Corral Canyon to the east, portions of which are existing and portions of which are proposed. The Plan also includes a proposed north-south Beach to Backbone Trail in Corral Canyon. The Beach to Backbone Trail would connect Dan Blocker Beach to a portion of the Coastal Slope Trail in Corral Canyon Park, then traverse northward to the Backbone Trail in Malibu Creek State Park. The following section provides more detailed descriptions of the various trail segments included in the Plan from west to east along the Coastal Slope Trail, and the north-south Beach to Backbone Trail within the Plan area.

Kanan Dume Ramirez Canyon Connector Trail (Ramirez Canyon Park)

This trail link (1a) would extend from the proposed parking facilities off Kanan Dume Road south and east through a Los Angeles County-owned parcel (to be acquired by MRCA), and through National Park Service land to Ramirez Canyon Park. The trail would ultimately connect west of Kanan Dume Road to Zuma/Trancas Canyons in the SMMNRA (not part of the proposed project). This stretch of trail east of Kanan Dume Road would be developed on relatively steep canyon terrain containing significant coastal sage scrub habitat. Several switchbacks would be required and one or more bridges may be required to accommodate the trail crossings across drainages. A bridge is proposed across Ramirez Creek in Ramirez Canyon Park. A Kanan-Dume Parking Spur is proposed from Parking Area 3 adjacent to Kanan Dume Road to connect to trail alignment 1a.

An additional trail alignment (1b) would extend from Kanan Dume Road to Ramirez Canyon Road along and within the Via Acero road widening and extension project component, if required to be constructed. Any grading associated with trail 1b is included in grading required for widening and extending Via Acero from Ramirez Canyon Road to Kanan Dume.

Ramirez Canyon Road and Ramirez Canyon Park Trail

Trail alignment 1b along Via Acero would connect to trail alignment 5a, traveling northward to the Ramirez Canyon Park entry gate. Once inside Ramirez Canyon Park, this trail alignment travels northward through developed areas in the park until it connects to the Coastal Slope Trail (at the intersection of trail alignments 1a and 2a3).

Ramirez Canyon Murphy Way Connector Trail (Ramirez Canyon Park)

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Several trail alignments were evaluated to connect Ramirez Canyon Park to Murphy Way (formerly De Butts Terrace) pending successful negotiations with adjacent property owners to offer trail easements, acceptance of trail OTDs resulting from future coastal development projects, or adjacent property purchases. The proposed trail alignment (2a3 and 2a6) is accessed directly from Ramirez Canyon Park and traverses land and/or easement recently acquired for purposes of completing the trail connection.

Murphy Way Escondido Canyon Connector Trail (Escondido Canyon Park)

Three alternative trail alignments were evaluated along the descending slope from Murphy Way into Escondido Canyon Park, each of which would connect to the existing Escondido Falls trail within the park pending successful negotiations with adjacent property owners to offer trail easements, acceptance of trail OTDs resulting from future coastal development projects, or adjacent property purchases. A fourth alignment south of the trail alignments evaluated (not included in this plan) is identified on the trails maps of the Interagency TMP and the City of Malibu Trail Plan (“Water Tank Trail”). However, there is currently no known formal public access available along this trail alignment via any dedicated trail easement or OTD that specifically provides for trail improvements. The proposed trail alignment (4b) provides access to Escondido Canyon Park on land recently acquired for purposes of completing the trail connection, and would avoid developed neighborhoods to the south. Trail 4 then traverses through Escondido Canyon Park and connects to the existing trails.

Escondido Canyon Park to Solstice Canyon Park Connector Trail

A large segment of the Coastal Slope Trail from Escondido Canyon Park to Latigo Canyon Road and east of Latigo Canyon Road is included in the Plan. The trail alignment (9/9a/9b) takes access from the existing trail in Escondido Canyon Park along the former Winding Way road right-of-way that traverses along the north-east boundary of Escondido Canyon Park, crossing Latigo Canyon Road, and following the Wilmont Lane road alignment into Solstice Canyon Park. Given that the majority of this trail alignment would remain within the corridor of a remnant road bed associated with the former Winding Way right-of-way on the west side of Latigo Canyon Road, very little grading would be required to implement this trail section, except to re-establish the trail where washout and failures have occurred. The proposed Plan includes two short alignments, 9a and 9b, west of Latigo Canyon Road that would connect Escondido Canyon Park to the new trailhead and camp area proposed at the Latigo property. Alignment 9a would pass on the southerly border of MRCA-owned property (Latigo Canyon Trailhead) just west of Latigo Canyon Road, whereas alignment 9b would pass along the existing dirt road bed/trail on private property to the south.

East of Latigo Canyon Road, the trail alignment (9) would be located north of the existing Wilmont Lane dirt road, and would consist of grading in steep, rocky terrain until the trail would depart northeasterly from the Wilmont Lane dirt road. The trail is proposed in this location north of the Wilmont Lane dirt road in order to separate vehicle

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and trail traffic. The trail would then be located on the old road bed of the former Roosevelt Highway. Circumstances may dictate that this first portion of the trail east of Latigo Canyon Road be moved south of (underneath) the Wilmont Lane road alignment. In this case, the trail would also still connect to the old road bed of the former Roosevelt Highway.

Dry Canyon Connector Trail/Solstice Canyon Trail and Portion of Corral Canyon East Trail

National Park Service's Solstice Canyon Park currently has a well established system of public trails and support facilities. From Solstice Canyon Park, the proposed Plan provides for a trail alignment taking access to the east from the existing Dry Canyon Trail and traversing property owned by the City of Los Angeles Department of Water and Power (DWP) to Corral Canyon Road and into Corral Canyon Park.

Implementation of the proposed trail corridor 10b would include trail improvements to an old road bed and disturbed habitat areas on the DWP property starting from Dry Canyon Trail in NPS-owned Solstice Canyon Park. Much of the proposed trail would then utilize an existing north-south trending moderately-sloped unofficial trail on a small ridge in disturbed habitat. The trail would then pass south and east towards Corral Canyon Road (11a).

The trail would then continue east of Corral Canyon Road. This proposed trail alignment (11a) descends into Corral Canyon to where a natural, informal stream crossing exists and provides access across the creek to a burn-out site (proposed for day-use improvements, discussed above). This section of the trail connection would require trail improvements within the riparian corridor of the stream. From this point, the public gains access to the existing Corral Canyon loop trail (Trail Segment 11e, discussed below; a portion of which is considered part of the Coastal Slope Trail), the Park's trailhead and parking facilities, and seasonal beach access to Dan Blocker Beach.

Another trail alignment (11d) would course parallel to Corral Canyon Road on the east side of the paved road, within the road right-of-way and existing disturbed dirt road. This would connect trail alignment 11a with 11c (see discussion of 11c below).

Beach to Backbone Trail: Corral East Trail (portion), Corral Easement Trail, Corral North Link 1, and Corral North Trail (Corral Canyon Park)

The Beach to Backbone Trail would connect Dan Blocker Beach to the Coastal Slope Trail in Corral Canyon Park, and then traverse northward to the Backbone Trail in Malibu Creek State Park.

From the beach, people currently cross PCH at grade, or they utilize the existing undercrossing at PCH to reach the existing Corral Canyon loop trail in Corral Canyon

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Park. A traffic light is also located at the intersection of Corral Canyon Road and PCH. The existing Corral Canyon Loop Trail is further divided into the Corral Camp Trail and the Corral Camp North Trail (portion of the Coastal Slope Trail). These existing trails in Corral Canyon Park would lead to the proposed campsite and day use areas. A portion of the Corral Camp Trail would be improved to make it accessible for persons with disabilities and would lead to Camp Area 1.

From the existing Corral Canyon loop trail, along the eastern edge of Corral Canyon Park, the Beach to Backbone Trail would primarily utilize the existing dirt road coursing in a northerly direction at the eastern edge of the Corral Canyon Park (trail alignment 14; "Corral East Trail"), without crossing onto private property. The trail would turn west and continue to utilize the existing old ranch road that passes in an east-west direction ("Corral East Trail"), and would cross Corral Canyon Creek.

Trail alignments 13a (Corral Easement Trail) and 13b (Corral North Link 1) provide a connection between the Corral East Trail segment of the Beach to Backbone Trail and Corral Canyon Road.

Trail alignment 15 (Corral North Trail) of the Beach to Backbone Trail would follow an old dirt road bed in a northerly direction for the first (southerly) portion. The trail would then traverse over property owned by MRCA, National Park Service, and California State Parks, until it met the Backbone Trail in Malibu Creek State Park.

Trail alignments 12 and 11c provide another connection along the western edge of Corral Canyon Park from the Corral East Trail portion of the Beach to Backbone Trail to the Coastal Slope Trail on the City of Los Angeles DWP property.

Much of the area where the Beach to Backbone Trail would be constructed is located in the upper Corral Canyon. Construction of the Beach to Backbone Trail would necessitate bridges or at-grade crossings where the trail crosses drainages and some segments may require retaining walls, where necessary.

b. Beach to Bluffs Trails

Several new camping areas, associated facilities, parking, and trails are proposed in the Conservancy-owned Malibu Bluffs. The City owns Malibu Bluffs Park (including the ballfields and Michael Landon Community Center) adjacent to, and east of, the Conservancy's land. No trails or other improvements are proposed as part of the Plan on the City's land. However, due to the adjacency of the properties and the trails on both properties, it is anticipated that trail and recreational users of the Conservancy land would use the City's land and vice versa.

There is an existing network of trails on Malibu Bluffs. Trails proposed on Malibu Bluffs include trails within the property (e.g., to connect one portion of the park to another, or to access new campsites), as well as trails to Malibu Road, which in turn connect to

various existing vertical access easements in between the existing ocean-front homes, to the wet sand. Some of these vertical access easements also connect to lateral access easements on dry sand.

The City's Malibu Trails System maps (2004) identify several trail alignments connecting Malibu Bluffs to Corral Canyon Park. However, these trail connections are not considered part of the Plan.

Trail alignment 16 would connect the proposed camp areas at the west bluff down to a proposed parking area on Conservancy land adjacent to Malibu Road. This alignment includes a proposed bridge to cross the drainage to connect to the existing trail on the east side of the drainage.

Trail alignment 17 would connect the proposed clusters of campsites on the west bluff to those campsites proposed on the east bluff (or main portion of Malibu Bluffs). A bridge is proposed at the bottom of the ravine. On the east side of the ravine, an existing trail (presumably an old road bed) would be improved, and would connect to the existing trails on the east bluff.

Trail alignment 18 would be an accessible trail to connect the proposed Parking Area 3 on the east bluffs to the proposed campsites in Camp Area 3.

Trail alignment 19 is a short stretch to connect an existing trail in the southeast portion of the property to Malibu Road. Also, a short stretch of the trail would be routed, and protective fencing would be installed. Other short trail segments are also proposed on Malibu Bluffs to connect to proposed camp areas, and are not numbered or called out separately in the project plans and figures.

D. CONSISTENCY ANALYSIS

Following is a discussion regarding the conformance of the proposed PWP with the relevant Chapter 3 policies of the Coastal Act and the relevant policies of the City of Malibu LCP, as applicable. Relevant policies implicated by the PWP have to do with public access and recreation, environmentally sensitive habitat areas, visual resources, hazards, water quality, new development, and archaeological resources.

1. Public Access and Recreation

a. Relevant Policies

The Coastal Act, Los Angeles County Malibu-Santa Monica Mountains Land Use Plan, and the City of Malibu certified LCP contain policies that protect public access and recreation in the Coastal Zone and encourage development of lower cost visitor serving recreation opportunities and overnight accommodations. Due to the length of relevant

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policy language, the following relevant policies are attached as Exhibit 7 of this staff report.

Coastal Act § 30210, 30212.5, 30213, 30214, and 30223.

Los Angeles County LUP Policies P1, P2, P3, P16, P18b, P31, P32, P36, P37, P189, and P192.

Malibu LCP Policies

2.1, 2.4, 2.7, 2.8, 2.11, 2.13, 2.15, 2.17, 2.18, 2.24, 2.25, 2.26, 2.27, 2.28, 2.34, 2.36, 2.37, 2.44, 2.45, 2.51, 2.52, 2.90, 5.68, 5.69, 5.70, 5.71, and LIP Section 3.4.2.D (1-6).

b. Analysis

Coastal Act Section 30210 mandates that maximum public access and recreational opportunities be provided for all people, consistent with the need to protect public safety, private property and natural resources. Coastal Act Sections 30212.5, 30213, 30214 and 30223 state that public facilities are to be provided throughout an area so as to mitigate impacts of overcrowding or overuse by the public of any single area; that lower-cost visitor and recreational facilities be protected; encouraged, and where feasible, provided; public access policies should be implemented in a manner that takes into account the need to regulate the time, place, and manner of public access depending on the facts and circumstances in each case; and upland areas necessary to support coastal recreation should be reserved for such uses, where feasible.

The City of Malibu LCP and the Los Angeles County LUP each include several policies that require protection and expansion of a variety of recreational opportunities in the Coastal Zone, particularly new low-cost recreation facilities. The Malibu LCP encourages development of trail camps in the City and prioritizes development of recreational uses that complement public recreation areas or supply recreational opportunities not currently available in public parks. The Overlay policies supplement these policies by providing specific development standards for development of limited overnight campsites which will serve to enhance low cost recreational opportunities in the Plan area, and by promoting the conduct of special public outreach programs at Ramirez Canyon Park. Additionally, the Overlay policies prioritize recreational uses that complement public recreation areas and provide recreational opportunities not currently available in public parks.

Lower-cost Visitor Serving Recreation

Consistent with Coastal Act Sections 30210 and 30213, County LUP Policies P1, P2, and P18b, and Malibu LCP Policies 2.1, 2.17, 2.34, 2.36, 2.37, 5.69, and 5.71, the proposed Plan will protect and enhance low-cost public access and recreational resources within the Plan area by creating an interconnected system of trails and public parklands and constructing park-specific improvements for hiking, equestrian activities, bicycling, camping, educational study, picnicking, and accessibility to natural areas. The Plan includes access, recreational facility, and program improvements for Ramirez

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Canyon Park, Escondido Canyon Park, the Latigo Trailhead property, Corral Canyon Park, and Malibu Bluffs, which will serve to maximize public access opportunities for visitors with diverse backgrounds, interests, ages, and abilities. Consistent with the above policies, the proposed Plan improvements consist almost entirely of low-cost access and recreational opportunities to support existing recreational demand. The proposed campsites are walk-in campsites and include, where appropriate, necessary support facilities such as picnic tables, flame-less cooking stations, self-contained restrooms, parking, and shade trees, etc., and also include an educational/interpretive component including signage related to the natural resources of the Santa Monica Mountains. Parking and camping user fees for proposed park facility improvements will be consistent with fees for such uses typical of the California State Parks system. Limitations on time of use will only consist of time restrictions required to ensure public safety (standard hours of operation and use restrictions associated with adverse environmental conditions, i.e. flood and fire conditions).

Ramirez Canyon Park contains a number of unique support facilities which are not readily or widely available at many parks in the Plan area. The Plan includes Ramirez Canyon Park program and operational elements that support special public outreach and educational opportunities, as well as the administrative infrastructure necessary to operate specialized public outreach programs and to ensure that maximum public access and recreational opportunities are provided for visitors with varying degrees of special needs. The proposed programs will expand recreational opportunities at existing, developed park facilities to serve a variety of visitors that are not readily available at other parklands, whenever feasible and consistent with safety needs and constraints of the parkland. Further, the Plan includes establishment of a fund, supported by net proceeds of special event uses at Ramirez Canyon Park, to fund a camping program designed to provide urban, disadvantaged youth with their first overnight camping experience to learn about camping equipment, environmental awareness, and outdoor leadership skills. It is anticipated that each special event at Ramirez Canyon Park would yield approximately \$1,000 of net proceeds, and could therefore fund approximately 20 participants in one overnight program event. As such, the proposed Plan will provide a new, low cost recreational experience and accommodation not presently available for most visitors to the Malibu coastal area and will thus further the goals of the Coastal Act and Malibu LCP to provide and enhance low cost recreation opportunities not currently available in the Plan area.

Consistent with Coastal Act Section 30210, County LUP Policy P1, and Malibu LCP Policy 2.1, to provide a wide range of recreational opportunities, the proposed plan improvements are designed to increase the level of accessibility to the parklands, as much as feasible, for visitors with disabilities, including the unique opportunity for fully accessible overnight camping. This is achieved by incorporating guidelines for the universal design of trails and park facilities where feasible and consistent with resource protection and safety requirements. The Plan further includes Ramirez Canyon Park program and operational elements that support special public outreach and educational opportunities, as well as the administrative infrastructure necessary to operate

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specialized public outreach programs and to ensure that maximum public access and recreational opportunities are provided for visitors with varying degrees of special needs. The proposed programs will expand recreational opportunities at existing park facilities to serve a variety of visitors that are not readily available at other parklands, whenever feasible and consistent with safety needs and constraints of the parklands. Additionally, the proposed Plan reserves, connects, and improves considerable upland areas for recreational use and proposes to implement the Commission's inland trail program, consistent with Coastal Act Section 30223.

Consistent with Coastal Act Section, 30212.5, 30214, County LUP Policies P14 and P16, and Malibu LCP Policies 2.16, 2.25, 2.26, 5.68, 5.69, 5.70, and 5.71, the Plan includes development of a number of support facilities throughout the Plan area to support access to and use of parklands, where limited support facilities are currently available or where none currently exist in some of the subject parklands, including new public parking and trailhead resources adjacent to Kanan Dume Road, at the Latigo Trailhead property, and, restrooms, potable water, and picnic areas at Malibu Bluffs. Further, the PWP includes the conversion of structures at Ramirez Canyon Park to support park operations and maintenance personnel necessary to maintain parklands and recreational areas. In addition, the Plan includes expansion of public parking resources at Corral Canyon Park. The Plan also includes trail use support facilities including self-contained public restrooms and water sources at trailheads for all of the park properties, except at Escondido Canyon Park. The Plan improvements have been designed in consideration of topographic, geologic and natural resource constraints, as well as minimizing conflicts with adjacent residential development. Proposed trail and park improvements include primarily low-intensity uses consisting of access trails and low-impact camp areas which are sited and designed to be non-invasive on the natural topography, to be sited in previously disturbed areas to the extent feasible, and to minimize impacts to sensitive habitat areas. The low-impact camp facilities, which are limited in size and location in consideration of geologic and natural resource constraints of each park property, will provide rare and unique low-cost overnight accommodations in the Plan area. The proposed park-specific project plans demonstrate that campsites are appropriately setback from the top of bank from all streams, or outer edge of the riparian canopy, whichever is greater, and in areas of level terrain, where feasible, to avoid the need for excessive grading and to minimize associated impacts to sensitive habitat areas and water quality.

The proposed Plan includes park program limitations and restrictions on park use to address hazardous conditions (red-flag days and flash flood warnings) and includes a detailed Fire Protection Plan (which addresses emergency evacuation), hydrology, and geologic constraints analyses, which have evaluated potential hazards associated with the proposed development and use of the parklands to ensure that maximum public access and recreational use of the parklands can be achieved consistent with public safety needs. In addition, the proposed Plan incorporates a number of existing trail corridors, trail corridors previously evaluated for the Draft Santa Monica Mountains National Recreation Area Interagency Trail Management Plan, the City of Malibu LCP

and the City of Malibu Trail Master Plan, that have been sited and designed to minimize potential conflicts with adjacent neighborhoods and steep terrain.

Protection Against the Overuse of Public Facilities

The proposed Plan includes several measures to ensure that public trail and park areas potentially subject to degradation resulting from intense and/or unrestricted use are addressed and fully mitigated. These measures include: 1) revegetation of degraded areas with native plants, 2) trail consolidation and improvement, 3) provision of support facilities such as defined parking areas and trail corridors, trash and recycling receptacles, self-contained restrooms, picnic areas, and 4) provision of support facilities necessary for operations and maintenance personnel and associated maintenance equipment. The Plan includes comprehensive Coastal Campgrounds and Trails Maintenance Plans for proposed trail and park improvements, and the existing structures of Ramirez Canyon Park have and will continue to provide a center within the Plan area for maintenance personnel and associated equipment storage necessary to sustain maintenance operations for the subject park areas. The Plan's support facilities will ensure that adequate facilities are provided and maintained to manage public parking, trailhead, day-use and camp areas, to accommodate potential trash and waste generation at park areas, and to ensure that facilities necessary to support personnel and store equipment to maintain the park properties are provided. These measures will ensure that public use of the parklands is maximized in a way that maintains park areas and sensitive resources such that they remain desirable destination areas for visitors.

These proposed improvements are distributed throughout the Plan area along the trail corridors and within the park properties addressed by the Plan and will serve to ensure that new and enhanced public access and recreation opportunities are provided to reduce the potential of overburdening limited existing public facilities concentrated in specific areas, and to ensure proposed improvements are appropriately sited, designed and maintained to protect environmentally sensitive habitat areas. Where severely degraded areas may develop, the Plan includes provisions for controlled and limited public access during the recovery period and in consultation with appropriate public agencies and/or resource specialists. Public use will be evaluated periodically to determine the need for use restrictions and any implemented limitations on public access will be removed at the termination of the recovery period. The Plan further provides that the Conservancy/MRCA conduct periodic assessments of park visitation numbers and patterns of use and monitor the quality of visitor experience to make the appropriate management changes to prevent potential degradation of natural resources from overuse. This provision will be carried through with MRCA's comprehensive Coastal Campgrounds and Trails Maintenance Plan for proposed trail and park improvements. As such, the proposed Plan is consistent with Malibu LCP Policies 2.8, 2.52, and 5.68.

Park Agency Coordination

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In addition to the Conservancy/MRCA-owned park properties, the Plan area includes portions of Federal and State-owned parklands (NPS Ramirez Canyon parkland and Solstice Canyon Park, and State Park's Malibu Creek State Park) containing expansive natural open space areas and established trails systems which are critical components of an integrated system of parks, trails, and open space intended for public use in the Plan area. Consistent with City LUP Policies 2.9 and 2.90 and County LUP Policy P3, the Plan provides for coordination with the National Park Service to ensure trail connectivity and sharing of visitor support facilities, and requires that all plans for location, design and development of park improvements located on, or potentially affecting, adjacent Federal parkland are to be submitted to the Outdoor Recreation Planner of the National Park Service to ensure continued interagency coordination and planning efforts for providing an accessible, safe and enjoyable trail system throughout the Plan area.

The National Park Service has been instrumental in the development of the proposed Plan with its focus on enhancing public access and recreation opportunities to the adjacent Federal parklands, as well as sharing guidelines for development of trail improvements and camping facilities to incorporate the recommendations of the Draft Interagency Regional Trail Management Plan (TMP). The National Park Service provided a letter of support for a conceptual trail alignment through the Federal parkland that would allow for a trail linkage between Kanan Dume Road and Ramirez Canyon Park via MRCA-owned parcels and then through land owned by the National Park Service. In addition, proposed trail plans have been coordinated with NPS staff. Consistent with LCP Policy 2.9, these coordinating efforts between the Conservancy, MRCA, and the National Park Service will ensure continued success of interagency coordination for the benefit of public resource protection, and increasing public access and recreational opportunities in the Santa Monica Mountains National Recreation Area.

The proposed Plan is a collaborative effort between the Conservancy/MRCA, National Park Service, and State Parks, and includes specific provisions to ensure that existing parklands, or lands which are purchased from willing sellers, dedicated or donated for the purpose of public use, resource protection and recreation, are accepted and maintained for public access, resource protection and recreation. The Plan includes public access and recreation within public parklands, and along all identified and documented public rights-of-way in the Plan area intended for trail access. The Plan sign program will provide information on regulations required to promote safe use of the area and resource protection. Appropriate signs and visual cues will also serve to clearly identify the designated public parking areas and public trails throughout the Plan area to avoid conflicts with private property and sensitive habitat areas.

Public Transit and Parking Facilities

City and County LUP policies encourage the use and extension of public transit and shuttle programs to access parklands (particularly from metropolitan Los Angeles) and to maximize public access and recreation opportunities. The policies also require that

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adequate parking be provided to serve coastal access and recreational uses, and that facilities be provided for bicycles. Overlay policies supplement these policies by providing specific measures and development standards to implement transit improvements and shuttle programs for the Plan area, and for the development of support facilities including parking at trailheads and park staging areas.

The Plan includes development of a recreational facilities and uses at park properties that are easily accessible to backpackers hiking along the proposed Coastal Slope Trail, bicyclists traversing along Pacific Coast Highway, riders of the public bus system (Metropolitan Transportation Authority, MTA), and other visitors traveling in their own automobiles. The proposed camping program is designed to be transit accessible, so that visitors can utilize the MTA bus service to backpack from the camp areas at Malibu Bluffs and Corral Canyon Park to travel further west to the Latigo Trailhead property, Escondido Canyon Park and Ramirez Canyon Park via the Coastal Slope Trail.

MTA bus service is available for transit from inner-city Los Angeles and other areas outside of Malibu to Corral Canyon Park and Malibu Bluffs. To maximize public access in the Plan area, the Plan includes measures for the Conservancy/MRCA to coordinate with the MTA to include a stop in the existing service route to the Winding Way Trailhead parking lot along the primary transportation corridor (Pacific Coast Highway), and to provide service information to the public via public notices, trailhead signs and website posting. The MTA offers low-cost transportation for people who otherwise would not have access to parklands and beaches and serves as an alternative means for gaining access to parklands. These transportation services are particularly vital in the Plan area given the limited amount of existing and proposed parking resources for visitors to travel to and from parks at trailheads.

The Plan also includes new public parking resources at existing parklands to alleviate parking demand for public use and recreation where current parking restrictions on adjacent roadways limit public access opportunities. Public parking improvements are proposed along Kanan Dume Road (to support access to Ramirez Canyon Park), near the entrance in Ramirez Canyon Park (improvement to existing parking lot), and the Latigo Trailhead property, Corral Canyon Park (improvement to existing parking lot), and Malibu Bluffs. The Plan includes bike racks at new parking facilities, which will serve to facilitate alternative means of transportation to and between park areas. In addition, the proposed Plan will provide an alternative method of accessing park areas by providing pedestrian connections between parklands, further supported by development of new facilities intended to accommodate and encourage biking. Finally, the Plan includes use of shuttles and van pools, and development of new hike-in opportunities, to facilitate public use of Ramirez Canyon Park where public access opportunities to the park are presently limited.

All proposed parking improvement locations have been evaluated by a qualified biologist to ensure that park improvements have been appropriately located, to the extent feasible, in previously disturbed areas, and are appropriately setback from the

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top of bank of any adjacent stream, or outer edge of the riparian canopy, whichever is greater. All proposed park improvement locations and uses have been evaluated for potential impacts to habitat areas and mitigation measures identified to ensure resources impacts are avoided and minimized to the maximum extent feasible.

The proposed Plan is consistent with City and County LUP policies relative to providing transit, alternative means of transportation and support facilities to support access and recreation. The Plan will develop new public parking resources to support public access and recreational uses, in some instances where none currently exist, and thereby will serve to meet the existing demand for parking resources necessary to support maximum access and recreational opportunities. The parking and trailhead support facilities will ensure there is sufficient infrastructure to support public access and recreation and will serve to maintain and enhance public access by facilitating extension of transit service and non-automobile circulation within the Plan area.

The Plan includes provisions for new and improved trails and public parking areas intended to support public access and recreation to parklands, and does not involve restrictions or limitations on any existing or proposed parking areas or adjacent roadways, with the exception of limitations on time of use required to ensure public safety (standard hours of operation and use restrictions associated with adverse environmental conditions, i.e. flood and fire conditions). As such, the Plan is consistent with LCP Policies 2.27 and 2.28.

The Plan area includes a major component of an expansive trail system with existing and planned trail corridors for the larger Santa Monica Mountains National Recreation Area. This trail system includes the Backbone Trail, a primary trail corridor traversing a variety of public parklands inland of the City from the urban areas of Los Angeles County to the east, across the Santa Monica Mountains, to Point Mugu State Park in Ventura County to the west. Various inland connector trails link urban areas with the trail corridors and parklands of the Santa Monica Mountains National Recreation Area from which one could ultimately gain access south to the shoreline. Implementation of the trail segments proposed by the Plan and support facility improvements is critical to completing and supporting access to the Coastal Slope Trail within the City of Malibu, and its ultimate connection to the Backbone Trail that will provide access to and between adjacent urban areas of Los Angeles County and Ventura County, the larger Santa Monica Mountains National Recreation Area, and the shoreline within the City of Malibu.

There are currently a number of existing trail planning resources that the proposed Plan has drawn from in an effort to implement a comprehensive trail system within the Plan area. Such resources include the Santa Monica Mountains National Recreation Area Interagency Trail Management Plan (TMP), City of Malibu Local Coastal Program Trail Map, and the City of Malibu Trail Master Plan. The existing and proposed trail alignments from these resources have been implemented wherever feasible, and in many instances, as illustrated on the Proposed Trail Resources Map, the proposed Plan

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will achieve many segments of these trail plans. However, where there is presently insufficient access opportunities via public easements (existing or proposed) and/or where there may be potential conflicts with adjacent neighborhoods or steep terrain that may be avoided, alternative trail alignments have been evaluated and incorporated into the Plan to ensure trail implementation, connectivity, and to reduce potential land use conflicts and resource impacts. The Plan's trail system utilizes alternative trail alignments on public land, within existing public trail easements, and within potential future public land purchases or easement dedications wherever feasible to avoid potential conflicts with private property and adjacent neighborhoods.

Consistent with the provisions of City and County LUP, the Plan will serve to create an interlinking network of parks, trails, and open space areas over multiple jurisdictions for diverse public use. The Plan includes trail alignments that minimize impacts on adjacent development, steep terrain, and fragile habitats. The Plan includes multi-use trail construction, wherever feasible and found consistent with applicable resource protection measures and provide connection opportunities to community trail systems within the City of Malibu and the Santa Monica Mountains National Recreation Area as identified on the Proposed Trail Map. The Plan's trail system is designed to provide diverse recreational and aesthetic experiences for various physical levels of users given the diversity of environments, terrain, habitat types included in the Plan area. In addition, the Plan will enhance a diversity of public access and recreation opportunities with necessary support facilities and accessible design features, including crucial public parking components for Ramirez Canyon Park, the Latigo Trailhead property and Malibu Bluffs.

Implementation of the proposed trail plan will provide and connect several threads within the coastal trail system in the Malibu and Santa Monica Mountains area. Some trail segments will traverse inland and parallel to the shoreline linking parklands and providing expansive and spectacular views of the coast, while others will connect parkland and upland areas to the shoreline such as at Corral Canyon Park. Additional parkland and shoreline access would be provided with the Beach to Bluffs trail improvements proposed at the Conservancy-owned Malibu Bluffs.

Conclusion

In conclusion, the Commission finds that the proposed PWP will provide maximum public access and recreational opportunities for all people, consistent with the need to protect public safety, private property and natural resources. The proposed Plan includes construction of trail connections for the Coastal Slope Trail and the Beach to Backbone Trail, and specific public access, recreational facility, and program improvements for Ramirez Canyon Park, Escondido Canyon Park, the Latigo Trailhead property, Corral Canyon Park and Malibu Bluffs to provide camp areas, critical support facilities, improved public transit, and improved trail and park accessibility to facilitate an increased level of accessibility for visitors with disabilities. The Plan will serve to protect and enhance a variety of recreational opportunities including hiking, equestrian

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activities, bicycling, camping, educational study, picnicking, and accessibility to natural areas throughout the Plan area with development of new and improved multi-use trail linkages, low-impact camping areas, special outreach programs and support facilities, all intended to support and expand public access and recreational uses. The proposed low-impact camping areas with support facilities will provide lower-cost overnight visitor accommodations that are rare in the surrounding areas. Therefore, the Commission finds that the portion of the PWP located in the City of Malibu, as proposed, is consistent with the public access and recreation policies of Malibu LCP. In addition, the Commission finds that the portions of the PWP located in unincorporated Los Angeles County, as proposed, is consistent with the public access and recreation policies of Coastal Act, and the policies of the certified LUP that the Commission uses as guidance.

2. Hazards

a. Relevant Policies

The Coastal Act, Los Angeles County Malibu-Santa Monica Mountains Land Use Plan, and the City of Malibu certified LCP contain policies regarding the minimization of risks to life and property in areas of high geologic, flood, and fire hazard. Due to the length of relevant policy language, the following relevant policies are attached as Exhibit 9 of this staff report.

Coastal Act § 30253.

Los Angeles County LUP Policies P144, P147, P148, P151, P154, P156, and P162.

Malibu LCP Policies 4.2, 4.4, 4.5, 4.8, 4.10, 4.11, 4.14, 4.45, 4.49, 4.50, 4.49, 4.50, 4.51, 4.52, 4.53, 6.29, and LIP Section 3.4.2.D.

b. Analysis

The Coastal Act and Malibu LCP require that new development be sited and designed to provide geologic stability and structural integrity, and minimize risks to life and property in areas of high geologic, flood, and fire hazard. The policies further require that grading on slopes be limited, that disturbed areas be landscaped or revegetated at the completion of grading, and that adequate drainage and erosion control facilities be provided to convey site drainage in a non-erosive manner to minimize hazards resulting from increased runoff and erosion. The PWP area is located in the Malibu/Santa Monica Mountains area, an area that is generally considered to be subject to an unusually high amount of natural hazards. Geologic hazards common to the Santa Monica Mountains area include landslides, erosion, and flooding. In addition, fire is an inherent threat to the indigenous coastal sage scrub and chaparral communities of the coastal mountains. Wildfires often denude hillsides in the Santa Monica Mountains of all existing vegetation, thereby contributing to an increased potential for erosion and landslides on property.

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The Forestry Division of the LACFD has designated the Malibu area of the Santa Monica Mountains as Fire Zone 4 or Very High Fire Hazard Severity Zone, the highest fire hazard category in Los Angeles County. Under this category, a variety of regulatory programs and standards are directed toward reducing the risk of fire hazard that include strict fire code compliance with respect to buildings and aggressive brush clearance. The California Department of Forestry and Fire Protection (CDF) also designate the Malibu area of the Santa Monica Mountains area as a Very High Fire Hazard Severity Zone. The CDF zones provide the basis for application of various mitigation strategies to reduce risks to buildings associated with wildland fires. Specifically, the zone determines the requirements for unique building codes designed to reduce the ignition potential to buildings.

The topography of the Plan area varies substantially and is particularly diverse at each of the parklands where new recreational facilities are proposed. Generally, the Plan area includes land consisting of coastal hillsides and canyons with habitat types ranging from highly disturbed within developed residential areas located along existing and proposed roadway trail corridors and the relative developed conditions at Ramirez Canyon Park (once used as an estate compound), to significant stands of coastal sage scrub, chaparral and riparian corridors which have been preserved within the other public parklands of the Plan area.

Geology

A site-specific geologic engineering study was prepared to specifically identify geologic constraints within the park sites of the Plan area and to provide recommendations for minimizing potential impacts associated with geologic hazards. For all proposed park facilities, the improvements have been determined to be feasible and could be located and designed to ensure stability and safety pursuant to the site-specific geologic engineering study. The study and FEIR concluded that nearly all of the proposed Plan improvements have been designed to be located outside of fault traces, areas prone to liquefaction, and the mapped extent of historic landslide events. The only Plan components proposed within mapped areas of these potential hazards include passive use hiking trails and day use picnic areas.

The project includes a parking area, day-use picnic areas and a restroom at the Latigo Trailhead property. All structural improvements would be located with adequate setbacks from a landslide identified on the property. Picnic tables would be placed near the landslide area, but would not require grading. The PWP requires that any park improvement projects demonstrate that they've been designed in compliance with the recommendations of a site-specific geotechnical report and soils investigation. With implementation of mitigation measures identified in the PWP, the park facility improvements at the Latigo Trailhead property are consistent with Section 30253 of the Coastal Act and City of Malibu Local Coastal Program Policies 4.2, 4.14, 4.4.

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Regarding hiking trails, the geologic study concluded that given the limited and short-term activities on trails, this use is considered low-risk and appropriate along the trail corridor areas as designed. The study recommended, and the PWP requires, that design/construction techniques appropriate to trail substrate (including landslide) be incorporated into the final design and implementation of the trails system to minimize the need for ongoing maintenance and avoid trail conditions which could be a safety hazard for hikers. With respect to this recommendation, conceptual trail layout utilized the Malibu Parks Public Access Enhancement Plan, Park and Trail Accessibility Design Guidelines prepared by Moore Iacofano Goltsman, Inc. (MIG, June 2006). However, in order to ensure proper final trail design and implementation, a specific mitigation measure is included in the PWP to ensure adherence to the Best Practices in the Park and Trail Accessibility Guidelines, including but not limited to, practices for Trails on Steep Cross Slopes; Trails on Flat Grades; Eroding and Hazardous Trail Edges; and Trails on Sandy Soils.

To minimize hazards resulting from increased runoff and erosion, Plan improvements have been designed such that proposed park facilities are located on relatively level terrain to avoid development and grading on slopes. The Plan includes several policies and implementation measures that require adequate drainage and erosion control facilities to convey site drainage in a non-erosive manner, and that require all graded and disturbed areas to be planted and maintained for erosion control purposes within sixty (60) days of completing any construction activities that involve soil disturbance or vegetation removal. In addition, restoration efforts for disturbed areas are required to consist primarily of native/drought tolerant plants.

Proposed Plan improvements have been analyzed to ensure that the new development and uses would not be subject to flood hazard. A Preliminary Hydrology/Bridge Crossing Report by Penfield & Smith (October 27, 2009) calculated the clear-water watershed and burned-and-bulked watershed flow rates for the 2-year, 5-year, 10-year, 25-year, 50-year, and 100-year events for each of the Plan's sub-watersheds. For purposes of a reasonable worst-case analysis, the project hydrology report relies on the 50-year "burned-and-bulked" Capital Flood condition to evaluate potential flooding impacts. The analysis and recommendations contained in the project preliminary hydrology report indicate that all of the park improvements, including trails, would require placement out of the 2-year clear water inundation limits of creeks and that all critical facilities such as restrooms would require placement out of the 50-year burned-and-bulked inundation limits in order to avoid potential flooding impacts. Accordingly, proposed Plans have located all proposed permanent or semi-permanent structures (such as, restrooms, fire shelters, fire sheds, etc) outside the 50-year burned-and-bulked inundation limits. According to the project preliminary hydrology report, 50-year storm events in the project area are short and infrequent events, and are typically forecast well ahead of time. Potential inundation of trail areas adjacent to lower Escondido Canyon Park and the Latigo Trailhead, and picnic areas and trails at Corral Canyon Park could occur during a 50-year storm. Likewise, creek crossings at these parks would be rendered temporarily inaccessible during a 50-year storm event.

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Human injury and loss of life, however, would not reasonably occur as sufficient warning would occur to ensure all affected park facilities would be evacuated well in advance of the storm and the Plan requires that these park properties be closed when more than 6 inches of rain is predicted within a 24-hr period or when any Flash Flood/Flood Warnings and Urban/Small Stream Advisories is issued by the National Weather Service (NOAA).

The Plan includes construction of twelve (12) potential pedestrian trail bridges; one at Ramirez Canyon Creek along trail alignment 1a from Kanan Dume to Ramirez Canyon Park, three at Escondido Creek along trail alignment 4 in the northern portion Escondido Canyon Park, four at Corral Creek along the Beach to Backbone Trail (one along trail alignment 11a, one along trail alignment 14, and two along trail alignment 15), and four within the Malibu Bluffs Conservancy Property. Final engineering design may allow for the construction of additional pedestrian bridges to minimize grading and/or creek encroachments. All other existing minor, at-grade trail crossings located throughout the Plan area currently consist of stepping stones and/or other informal stream crossings; no improvements are proposed at these locations. Pursuant to measures included in the PWP, all trails and associated improvements are required to be constructed and maintained in accordance with best practices of trail design and would therefore include drainage conveyances and erosion control devices.

If required by the appropriate fire agency(ies), one vehicular bridge on Ramirez Canyon Road is proposed to be replaced and upgraded to a travel width of 20-ft as part of the Ramirez Canyon Road widening plan. The new Ramirez Canyon Creek bridge would replace an existing wooden vehicular bridge along Ramirez Canyon Road, located just south of the intersection with Via Acero, with a 20-ft clear width and 34-ft long, prefabricated steel bridge. Within Ramirez Canyon Park, an existing Arizona creek-crossing (if required by the appropriate fire agency(ies) to be widened to a travel width of 20 ft) is proposed to be widened or replaced with a span bridge. The PWP requires that all bridges be designed so that bridge abutments are located above the 100-year flow for streams and/or drainages. The PWP also requires that any road or bridge improvement projects demonstrate that they've been designed in compliance with the recommendations of a site-specific geotechnical report and soils investigation.

Proposed creek enhancement/restoration efforts for Ramirez Canyon Creek would improve flood conditions. The creek enhancement/restoration plan includes removing select existing gabions and installing pervious boulder berms and/or log deflection structures throughout the creek to control stream degradation; creating areas of overbank enhancement in two areas (by the existing tennis court and at the southerly portion of the park) by removing artificial creek wall linings, grading back the slopes, constructing rock toe protection, installing retaining walls, and planting native plants; and planting of native plant species and removing non-native plants throughout the creek. Penfield & Smith's drainage analysis determined that the capacity of the creek would be increased at this location, and the improvement would not result in new flood concerns.

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Consistent with Coastal Act Section 30253 and relevant Malibu LCP policies, the proposed Plan improvements have been sized, designed, and sited to minimize risks to life and property from geologic and flood hazard, and the PWP includes adequate measures to minimize grading and control runoff from the sites, thereby reducing potential site erosion, which might otherwise contribute to site instability.

Fire Hazards

Causes of wildfires in California can be classified as either natural (lightning, volcanic) or anthropogenic, including intentional (arson) and unintentional sources (railroad, escaped prescribed burn, power lines, equipment use, etc.). Traditional recreation-based land uses introduce potential wildfire ignition sources that differ from other development types such as road construction, power line installation, or residential development. Potential fire ignition risks associated with recreation-based land use typically include illegal or unattended campfires, smoking, arson, or vehicle-originated fires (e.g. catalytic converters). Of these, only campfire ignition sources are unique to recreation-based land uses. The SMMC provided the following information regarding fire causation (FEIR, 2010):

The California Department of Forestry and Fire Protection (Cal Fire), through its Fire and Resource Assessment Program (FRAP), maintains a GIS database of wildfire perimeters for the State of California from 1878 to 2008 which includes amongst its attributes a fire cause designation. Based on an analysis of this data set (FRAP, 2009), wildfire incidents in California originating from campfire ignition sources are extremely low. Specifically, of the 16,852 fires recorded in California between 1878 and 2008 (FRAP, 2009), only 268 (1.6%) were caused by campfires. Based on the same data set, of the 2,208 fires recorded in Los Angeles County over this time period, only 10 (0.5%) were caused by campfires. Further, none of the historic wildfires in the Santa Monica Mountains have campfire origins. The dataset does not distinguish between camp fires in managed and patrolled campgrounds as compared to those in unmanaged areas or illegal campfires, the latter of which is more likely to result in escape. However, all of the referenced Los Angeles County "campfire-caused" fires were in the Angeles National Forest. The majority of the Malibu area has experienced major brush fires in the past 10 to 30 years, with the most recent fires being the Canyon Fire on October 21, 2007 and the Corral Fire on November 24, 2007.

It must be acknowledged that the Corral Fire was caused by an illegal fire lit by individuals within public parklands at night when the area was not legally available to the public. There are no known instances of fires caused by campfires or other activities taking place within formal public or private recreational facilities in the Santa Monica Mountains. More likely causes for wildfires in the Plan area and the greater Santa Monica Mountains region are associated with other anthropogenic sources including roadways (tossed cigarette, vehicle accidents, catalytic converter, or car fire), unattended children, arson, electrical transmission lines, or use of gas powered mowers, trimmers or other equipment. Public access to parklands may increase ignition potential based on some of the aforementioned cause types, however, carefully planned and controlled access and increased patrols along with restrictions regarding open flames of any type, and better education of park visitors, will result in the lowering of such ignition risks, as has been demonstrated at other camp areas throughout the state.

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While the availability of camping opportunities is limited in the area, there are three examples that are similar to the camping facilities proposed in the PWP. One is the Malibu Beach RV Park which is a privately managed facility that includes tent camping and is located on the bluff above Pacific Coast Highway, near Corral Canyon Park. Information provided by this facility indicates that wood fires are not allowed as part of tent camping, but burning charcoal or propane is allowed. Additionally, California Department of Parks and Recreation (State Parks) operates campgrounds at Leo Carrillo State Beach (west of the City of Malibu) and at Point Mugu State Park (further west in Ventura County). The campgrounds at each of these state parks allow campfires and outdoor cooking.

While the Point Mugu campgrounds are located in a relatively remote location, the campsites at Leo Carrillo and Malibu Beach RV Park are in proximity to existing development and in similar geographic locations. The Leo Carrillo campground is located inland of Pacific Coast Highway in a riparian/oak woodland area. The Malibu Beach RV facility is on a bluff inland of Pacific Coast Highway between Solstice and Corral Canyons. These facilities have been in existence for some time and have been managed to avoid causing hazardous situations, including fires, for campers or for nearby residents. There are no known instances of wildfires being started by visitors to any of these campgrounds. The Commission concludes that while there is a potential for the recreational uses proposed in the PWP to increase the risk of fire, such uses including camping can be managed to avoid and minimize such risks.

The proposed Plan would implement a number of park and recreation improvements that would accommodate and expand future activity levels at each of the parks within the Plan area. It is anticipated that the number of visitors to the Park areas would increase over time due to the proposed improvements and specific increased uses proposed as part of the Plan.

Consistent with Coastal Act Section 30253 and related Malibu LCP policies which address potential fire hazards and require that new development minimize risks to life and property from fire hazard, the proposed Plan has been designed to reduce fire risks in the Plan area, and includes a number of provisions to ensure that improvements and land uses ensure fire safety at the subject parklands. The proposed camping areas would be clustered at Corral Canyon Park and the Malibu Bluffs Conservancy Property (with the exception of two accessible campsites in Phase II development proposed for Ramirez Canyon Park) in close proximity to PCH, which limits the intensity level of park activity in the plan area, resulting in fewer people potentially being exposed to risks from wildfire hazards. Campsite locations have been located within existing public use areas to ensure easy access for purposes of maintenance and patrol, and in case of emergency.

The Fire Protection Plan (FPP) for the Malibu Parks Public Access Enhancement Plan – Public Works Plan, adopted by SMMC and MRCA as part of the EIR, evaluated the potential impacts associated with exposure to wildfire hazards that could be

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encountered as part of implementation of the Plan (Exhibit 19). The FPP contains a Plan-wide fire protection plan and focused fire protection plans for each park property, which assess the fire risk associated with the proposed Plan and sets forth park-specific requirements for emergency response, evacuation, water supply, access, building construction, fire protection systems, defensible space, and vegetation management. The FPP outlines a "systems approach" to fire prevention, protection, suppression, and emergency relocation to ensure proposed park improvements and uses will reduce potential risks associated with fire hazard. The FPP provides measures for fire protection based on the proposed site uses, occupancies, and park area settings, and provides requirements that meet the 2007 California Building and Fire Codes, and the Los Angeles County Fire Code, where applicable.

The proposed Plan includes prohibition on all flames, provision of all-weather outlets at each cook station for the use of approved electrical cooking devices, ignition resistant/ember protection structural retrofits to buildings at Ramirez Canyon Park, if required, interior sprinklers in all existing Ramirez Canyon Park buildings, bridge reinforcement/replacement over Ramirez Canyon Creek to safely support 75,000 pound fire apparatus, permanent on-site Park Administration/Employee Quarters at Corral Canyon Park and Malibu Bluffs to increase presence of wildland fire-trained employees(s) and/or camp host(s) during the times when camping is permitted, fuel modification/vegetation management buffer widths around proposed facilities pursuant to LACFD recommendations, "optional" emergency fire shelters in select park and trail areas, standard and wildland fire hydrants at each park, and additional fire apparatus provided at all camp facilities (e.g., portable and air-powered quick attack firefighting system and portable self-contained fire extinguisher units). Since the PWP proposes primarily recreation improvements with minimal structural additions, the requirements for fire safety are customized for the various sites and are, in most cases, not covered under existing Fire or Building codes. Where possible, the codes are applied or used as guidance.

Below are the fire protection measures recommended by the FPP that have been incorporated as part of the proposed Plan:

Fuel Modification and Vegetation Management

The proposed Plan incorporates fuel modification areas, which are designed to gradually reduce fire intensity and flame lengths from advancing fire by reducing fuels, placing thinning zones, restricted vegetation zones, and irrigated zones adjacent to each other on the perimeter of structures and adjacent naturally vegetated areas. Fuel Modification Plan requirements would vary at each park property depending on site-specific characteristics and the type of improvement/uses proposed. The fuel modification zones would provide defensible space set backs and would be maintained on an annual basis by May 15, or more often if needed, as determined by CAL FIRE or its representative or Los Angeles County Fire Department (LACFD); all Conservancy-owned properties are under the fire jurisdiction of CAL FIRE, while MRCA-owned

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properties are under the fire jurisdiction of LACFD. Maintenance would be provided by the Conservancy/MRCA and would be consistent with standard fuel management practices. The LACFD currently recommends the following fuel modification buffers within the Plan area:

- Fire Shelter: 200'
- Fire Truck Shed: 100'
- Equipment Storage Shed: 100'
- Campsite: 20'
- Parking: 20'
- Roads: 20'
- Restrooms: 20'
- Employee RV/ Camp host RV: 20'
- Employee Residence: 200'

However, consistent with LACFD direction, fuel modification zones for all proposed parking and roads may be reduced from 20 ft to 10 ft; such reductions would occur where necessary to avoid impacts to Environmentally Sensitive Habitat Areas (ESHA). It should be noted that although the above buffers were utilized (for purposes of a reasonable worst-case analysis) in the analysis of the PWP, based on preliminary communications with LACFD, it may be possible to reduce these fuel modification buffers based upon CAL FIRE and/or LACFD review of final construction drawings.

Cook Stations (Hospitality Stations)

Pursuant to the PWP, campers would be required to utilize designated cook stations (hospitality stations) provided at each approved campsite, which would be designed of nonflammable materials and capable of being enclosed vertically on three sides (leaving one side open for cooking operations); a horizontal rain cover would also be provided. Cold-camping apparatus such as flame-less cook-stoves and lanterns would be required; use of any type of liquid fuel (alcohol, kerosene, unleaded gasoline, white gas, mentholated Spirit, etc.), canister fuel (propane, butane, etc.), wood, wax or any other type of combustible material for cooking or lighting would be expressly prohibited. Each cook station would be equipped with an all-weather electrical outlet. Upon check-in by a wild-fire trained camphost or ranger, campers would be informed of the No Campfire/Cold Camp Policy and would be offered the opportunity to check-out a dual burner electrical hot plate for cooking purposes during their stay; a nominal deposit would be required. Use of electric hot plates, grills, griddles, waffle irons, and/or similar small electrical cooking appliances brought from home would be permissible (subject to the discretion of MRCA Rangers, camphosts, and/or staff) at the designated cook stations only.

Upon reserving and registering for use of camp facilities, prospective campers would be put on notice that unauthorized use of fire-related camping and cooking apparatus is specifically prohibited by the No Campfire/Cold Camp Policy, but that use of small

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electrical cooking appliances (as described above) would be permissible. Campers would be notified that use of fire-related camping and cooking apparatus would be cause for expulsion of visitors from camp facilities and punishable by fines up to \$1,000.00. Signs would be posted at the designated cook stations informing campers of the No Campfire/Cold Camp Policy. In addition, campers would be notified that use of the cook station electrical outlet(s) for space heaters, lighting sources, hair curling and flattening devices, blow dryers, stereos or other devices emitting audible noise would be cause for confiscation of such devices and/or expulsion of visitors from camp facilities.

Water Storage Tanks

The proposed Plan includes construction of water lines to provide water to the proposed campsites and park/trail facilities, as well as for increased fire protection. With the exception of the existing water storage facilities at Ramirez Canyon Park, water lines would connect to proposed water tanks at Corral Canyon Park and Malibu Bluffs Conservancy Property, with each tank having a capacity of 10,000 gallons. The existing water tanks at Ramirez Canyon Park would remain in place and would be utilized for proposed park improvements at that location. There are currently two proposed configurations for the 10,000-gallon water tanks which would be installed at park properties not currently served with water tanks for increased fire protection.

At Corral Canyon Park, a water tank at the top of a knoll would provide a pressurized water source for fire-fighting capabilities, which would be connected to a pump station a few feet above sea level to provide adequate pressure to fill the tank. Water tanks at the other parks would provide a secondary unpressurized water source for fire-fighting (in addition to the hydrants). Ramirez Canyon Park currently has a 4,500-gallon and a 10,000-gallon water tank, one central wharf head, and water lines.

Fire Hydrants

All of the park properties where camping is permitted would receive new fire hydrants for fire protection. The fire hydrants would consist of standard fire hydrants and wildland fire hydrants. Standard fire hydrants include both a 4-in. and a 2 ½-in. outlet, while a wildland fire hydrant includes one 2 ½-in. outlet. Water lines would be installed underground to the camp areas to service hose bibs with drainage sumps. In addition to the hydrants described above, a wildland fire hydrant connected to this water line would be located within 50 ft of any campsite. The wharf head (i.e., wildland fire hydrant) would provide a 2½-in. hose connection for Fire Department use. In addition, a ball valve (to turn the water on and off) would connect to a hose reel with 100 ft of 1-in. fire hose and a permanently attached nozzle, which a ranger, fire fighter, wildfire-trained camp host, or camper could use in case of emergency.⁵

⁵ Campers would be encouraged to utilize fire extinguishers for any observed small fires and to report any and all fires to a wildfire-trained camp host or ranger, who are trained in emergency response and the use of all on-site fire fighting equipment. There is no expectation that campers would stay on-site to extinguish a wildland fire.

Additional Fire Protection Apparatus

Additional fire protection apparatus would be provided and maintained at all proposed camp facilities and would include, at a minimum:

- A portable and air-powered quick attack firefighting system to be provided at each camp facility for ready deployment by trained Camp Host, Ranger, or park personnel in the event of a fire.
- Portable self-contained fire extinguisher units to be provided for each cluster or group of campsites.

Fire Truck Storage Sheds

The proposed Plan includes two Fire Truck Storage Sheds, which would be unmanned, enclosed steel structures, located on a concrete slab, and utilized for the parking of fire engines and/or housing miscellaneous fire protection equipment. The Fire Truck Storage Sheds are proposed at Corral Canyon Park Parking Area and Malibu Bluffs Parking Area 1. The Fire Truck Storage Sheds would be metal structures, approximately 40 ft by 15-ft and 12-ft high, and would be assembled on site using bolts that would connect the metal sections. After assembly is complete, the door would be bolted to the structure. To prepare for construction of the Fire Truck Storage Shed, concrete would be used to form the floor and a two-foot deep perimeter around the building. A 6-in. slab with ½ in. of rebar would be applied to reinforce the floor and prevent cracking when heavier trucks utilize the shed.

The fire trucks, which could be located within the Fire Truck Storage Sheds at Corral Canyon Park and Malibu Bluffs, are intended to service parklands owned and/or managed by the Conservancy/ MRCA. The primary first responders to City/County Parks and residential areas for medical and fire emergencies would continue to be the responsibility of LACFD. The Corral Canyon Park and Malibu Bluffs locations were identified by MRCA staff as appropriate sites for the Fire Truck Storage Sheds because sufficient room was available at these locations and because they are strategically located near Pacific Coast Highway for ready access by either on- or off-site MRCA rangers and wildfire trained specialists in need of MRCA-authorized use of fire fighting vehicles and/or equipment.

Park Patrol

The WWP requires that a Camp Host, staff maintenance person, or Ranger, who is wildland fire-trained, be on site at each park property during the times camping is permitted. The proposed Plan provides for residency facilities for a Camp Host, staff maintenance person, or Ranger at the parks where camping is proposed (Corral Canyon, Bluffs, and Ramirez Canyon Park), and requires that support facilities and apparatus are provided to sustain continuous daily and nightly patrols to strictly enforce the No Campfire Policy and use restrictions relating to hazardous conditions. Park

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patrols are required to be conducted daily at each park property when campers are present. Adjustments to patrol procedures will be made as necessary to ensure park rule enforcement and compliance. Every Camp Host will be designated and trained as a “public officer” designated pursuant to the MRCA Park Ordinance. As public officers, Camp Hosts and/or Park Rangers shall enforce all applicable ordinances and regulations, including the “cold-camping” provisions cited within the PWP.

Ramirez Canyon Access Improvements

The proposed Plan includes a preliminary design for emergency ingress/egress road improvements for the Ramirez Canyon community, proposed to be implemented during Phase 1 of the Plan. Actual improvements will be implemented consistent with the responsible fire agency’s final design and timing requirements (based on agency jurisdiction). These preliminary design improvements include widening of the existing access road and removal of encroachments in the road easements, as necessary, to provide as great as 20-ft clearance for emergency ingress/egress in the canyon along Delaplane Road and Ramirez Canyon Road, per the initial recommendations of the LACFD. These improvements (or other similar alternative measures required by the responsible fire agency consistent with Fire Code allowances) would enhance overall vehicular access along Ramirez Canyon Road and would provide for improved emergency access to and from the Ramirez Canyon corridor. The proposed widening of Ramirez Canyon Road and Delaplane Road would occur during Phase 1, if required by the responsible fire agency. Within Ramirez Canyon Park itself, driveways/roads would be widened to necessary widths if required by the CAL FIRE. Improvements within the park include, if required by CAL FIRE, the widening of an existing Arizona creek crossing or replacement with a 20 ft. wide span bridge.

In addition, pursuant to the initial recommendations of the LACFD, the proposed Plan also includes a preliminary design for improvements to Via Acero Road to provide secondary emergency vehicular ingress/egress for Ramirez Canyon as part of Phase 2 park improvements. The secondary emergency access improvements include extending the paved portion of Via Acero generally along the path of an existing dirt road for approximately 1,400-ft to intersect with Kanan Dume, and widening of Via Acero to a width as great as 20-ft over its entire length between Kanan Dume and Ramirez Canyon Road (approximately 2,904 ft). Additionally, the proposed Plan requires that Phase 2 special events held during the fire season shall retain all guest vans, shuttles, and drivers continuously on site during the event. Additional vehicles shall be provided, as needed, on site at Ramirez Canyon Park so that there would be enough vehicular capacity to relocate all persons on site for any event in one trip out.

The widening of Ramirez Canyon Road and the extension of Via Acero as secondary access to Ramirez Canyon, or other similar alternative measures required by the responsible fire agency consistent with Fire Code requirements, would improve emergency access and evacuation at this park. Widening Ramirez Canyon Road would ensure that emergency vehicles can enter the canyon during periods when evacuations

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are occurring, and would provide additional capacity for evacuation flows. Providing the secondary emergency access route into Ramirez Canyon would allow emergency vehicles to enter the canyon from two points and would provide a new route for evacuation. This secondary emergency access route could be used for evacuating residents or Ramirez Canyon and guests/employees of Ramirez Canyon Park in the event of an emergency.

Ramirez Canyon Structural Retrofits

The Plan proposes retrofitting existing structures within Ramirez Canyon Park for ignition resistance/ember protection, if required, and fitted with interior fire sprinklers. The Plan also proposes retrofitting, for use as an emergency fire shelter, the existing Ranger/Maintenance Supervisor Residence as part of Phase 1 Ramirez Canyon Park improvements, and the existing Peach Building as part of Phase 2 improvements. Given the limited uses associated with Phase 1, it has been determined that the Ranger/Maintenance Supervisor Residence would be capable for providing shelter for the maximum number of people that would be at the park at any given time, as a last resort fire protection option. Similarly, the inclusion of the Peach Building as another shelter upon implementation of Phase 2 would ensure the maximum number of people allowed at the park during that phase could be housed as a last resort. The following features are proposed for retrofitting designated structures intended to be utilized as emergency fire shelters at Ramirez Canyon Park:

1. Exterior walls shall be approved noncombustible (stucco, masonry, or approved cement fiber board) from grade to underside of roof system. Any unenclosed under-floor areas shall have the same protection as exterior walls. Wall coverings shall extend from top of foundation to the roof. The underside of any cantilevered or overhanging appendages and floor projections shall maintain the ignition-resistant integrity of exterior walls, or projection shall be enclosed to grade. The Fire Code allows 0.375-inch plywood or 0.75-inch drop siding if there is an underlayment of 0.5-inch fire rated gypsum sheathing tightly butted or taped and mudded (Section 704A.3 CBC).
2. Two-inch nominal solid blocking shall be provided between rafters at all roof overhangs under exterior wall covering (Section 7041.3.1.1 CBC).
3. Eaves and soffits shall meet requirements of the State Fire Marshal 12-7A-3 or shall be protected by ignition resistant materials or noncombustible construction on the underside (Section 704A.2.3 CBC).
4. All roofs shall be a Class "A" listed and fire-rated roof assembly, installed per manufacturer's instructions, to approval of the state Fire Marshal. Any openings on ends of roof tiles shall be enclosed to prevent intrusion of burning debris. When provided, roof valley flashings shall not be less than 0.019-inch (No. 26 galvanized sheet gage) corrosion-resistant metal installed over a minimum 36-inch-wide underlayment consisting of one layer of No. 72 American Society for Testing and Materials cap sheet running the full length of the valley (Section 704A.1 CBC).
5. No attic ventilation openings or ventilation louvers shall be permitted in soffits, rakes, eaves, cornices, eave overhangs, or between rafters at eaves, or in other overhanging areas in the Wildland Urban Interface (WUI) area. Attic or foundation ventilation openings or ventilation openings in vertical walls or other similar ventilated openings shall be louvered and covered with corrosion-resistant metal screening or other approved material that offers equivalent protection. Vents are required to have a 1/8-inch mesh and shall not exceed 144 square inches each. Attic and foundation ventilation shall also comply with the requirements of

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the CBC. It is recommended that Flame and Ember resistant vents with internal baffles are applied to all wildland-exposed sides of these residences.

6. Vents shall not be placed on roofs unless they are approved for Class "A" roof assemblies or are otherwise approved by the state Fire Marshal.
7. Vents, such as roof vents, dormer vents, gable vents, foundation vent openings, vent openings in walls, or other similar vent openings, shall be covered with louvers and the required 1/8-inch mesh or are specific flame and ember resistant (i.e., Brandguard Vents).
8. Turbine vents shall not be utilized.
9. Glazing, including glass, or other transparent, translucent, or opaque glazing, or leaded glass, shall be one of the following: double pane with one tempered pane or glass block, or have a fire rating of 20 minutes (Section 704A.3.2.2). Plastic or vinyl window frames shall be of an approved type, which will not melt, ignite, or fail. Vinyl frames shall have welded corners and metal reinforcement in the interlock area to maintain integrity.
10. Skylights shall be certified to Architectural Manufacturers Association/Window and Door Manufacturers Association/Canadian Standards Association 101/I.S-2/A440 structural requirements. (Section 2405.5 CBC).
11. Exterior doors shall be approved noncombustible or 1.25-inch solid-core wood or have a 20-minute fire rating. Windows within doors and glazed doors shall comply with item 11 above (Section 7904A.3.2.3 CBC).
12. All chimneys and other vents on heating appliances using solid or liquid fuel, including outdoor fireplaces and permanent barbecues and grills, shall have spark arrestors of a type approved by the state Fire Marshal. Spark arrestor openings shall be a maximum 0.5 inch.

For all other habitable structures, as the Ramirez Canyon Park is a State-owned property, any requirements for upgrades and/or retrofits to existing structures would be determined by CAL FIRE. If required by CAL FIRE, existing structures at Ramirez Canyon Park may be retrofitted to provide improved ignition resistance. Retrofits will be focused on preventing ember intrusion into attics and openings and may include retrofitting vents and openings (doors, windows). Additionally, each structure will be retrofitted with monitored interior sprinklers.

In addition to the improvements for non-shelter buildings at Ramirez Canyon Park (i.e., the Barwood building, the Art Deco building, and the Barn) cited above, it should be noted the following equipment is currently available on-site and would be utilized as described below in the event of an approaching wildfire:

- ◇ **Foam Blanketing:** As part of MRCA's existing fire action plan, Engine 12 has been stationed at Ramirez Canyon Park full time. The engine has been modified specifically to produce high volumes of class A foam, similar to a Airport "Crash Engine," which can be used to pretreat, then reapply, a thick blanket of foam on all of the structures within the park boundaries in advance of a wildland urban interface fire. The engine is completely mobile in the Park and has the capacity to carry four hundred fifty gallons of foam concentrate on board; according to MRCA fire personnel, that coupled with the 39,500 gallons of water that is kept available in tanks and swimming pool on-site, along with the use of the portable dip tank would be more than sufficient to pre-treat, then apply, a thick blanket of foam to each of the structures. The engine can produce class A foam in various concentration levels (note: one percent solution is considered adequate for pre-treating structures, which in essence allows the water foam solution to break the surface tension of the combustible material and to soak into the structures more rapidly). If afforded additional time, the engine could then go back and apply a six percent solution that would look like a white blanket of foam, which gives the foam longer "hang/stay" time to protect the structures from direct flame impingement.

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- ◇ **Fire Gel:** In addition to the foam engine, MRCA fire personnel keep on hand a supply of fire gel. Fire gels differ from class A foam in so much as they do not allow the water to penetrate the structures, they instead hold the water in a gel state on the surface of the structure thereby forming a "wet barrier" that can take direct flame impingement for up to forty-five minutes.

Relocation Planning

During a fire emergency, early relocation (evacuation) from the parks would be the preferred method of safety when adequate warning is provided, which is anticipated to be the majority of the time when wildfires occur. The PWP calls for a relocation planning process to be developed that is an orderly, pre-planned process where people are relocated from the parks to off-site areas away from wildland fuels in the event of a fire. During relocation, MRCA Rangers/wildfire-trained camp hosts/fire fighting personnel would direct staff and visitors to utilize the primary access points in the various parks.

The PWP requires that Ramirez Canyon Park, Escondido Canyon Park, Latigo Trailhead, Corral Canyon Park and Malibu Bluffs be closed to all recreational use during any Red Flag Day/period as declared for the Santa Monica Mountains area by the National Weather Service, a division of the National Oceanic Atmospheric Administration (NOAA).

It is considered very unlikely that a wildfire scenario would occur that would preclude safe relocation of visitors and staff from the parks. However, the Plan includes a mandate for temporary "last resort" on-site sheltering at Ramirez Canyon Park should relocation from the Park be determined to be more dangerous than remaining on-site. Additional discussion of emergency fire shelters is further described in detail below.

Emergency Fire Shelters

In order to address fire safety concerns associated with wildfire scenarios that would not allow enough time to safely evacuate the Plan area, the proposed Plan specifies that if required by the responsible fire agency, Ramirez Canyon Park shall have an emergency fire shelter(s) capable of accommodating the largest assembly of persons on-site allowed under the Plan (Phase 1: 60 persons; Phase 2: 250 persons). The Ranger/Maintenance Supervisor Residence (Phase 1) and the Peach Building (Phase 2) would be remodeled and retrofitted to provide a safe and temporary "last resort" on-site sheltering should relocation from the Park be determined to be more dangerous than remaining on-site.

For all other park sites, emergency fire shelters would be optional and are identified on project plans as optional. The shelters are not considered a crucial component of fire protection planning at the other parks due to the location of the camping areas' relative proximity to highways and/or roadways, as well as in consideration of the other components of the proposed fire protection plan. These shelters are considered optional and would only be installed if required and approved by the appropriate fire agency(ies).

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Although there are no known building design standards for fire shelters, the proposed fire shelters would be constructed with Timbercrete, or an equivalent cement-based building product, and would have a Fire Resistant Level (FRL) of 240/240/240 during tests conducted on a single skin wall (190 millimeters [mm] to 200 mm thick), which is the highest fire rating. Each structure would have a triple-pane, triple-glazed fire resistant glass window (or equivalent), an insulated fire resistant door with a RFL-/240/30 (or equivalent), and a fire resistant spy hole with glass similar to the window (or equivalent). Proposed shelters would range in size from 11.8 ft by 10.5 ft to a maximum of 12 ft by 16 ft, with heights of approximately 10.5 ft. To provide the most conservative analysis, the larger size shelter was used for purposes of identifying impacts. The 11.8 ft by 10.5 ft structures would hold a similar number of people as the 12 ft by 16 ft structures; though more sitting room would be available in the larger structures. The shelters would be painted with ignition resistant paint colors that are earth-toned, camouflage, or otherwise compatible with the existing landscape. Directions for the use of the shelters would be located on the interior and exterior of each structure which would describe what the shelter is, and when and how it should be used. The shelters would be available for use by anyone and would not be locked; instead, signs would be posted indicating that there would be penalties for inappropriate use. In most situations, it would be anticipated that the assigned wild-fire trained camp host and/or park ranger would instruct park guests to either evacuate the park or enter the fire shelter based upon the best available information and judgment of that professional.

The proposed optional emergency fire shelters would be equipped with an air tank, similar to what fire-fighters use, that could be turned on as a fire storm approached the shelter. The air tank would slightly pressurize the fire shelter forcing excess cooler air out around the small gaps surrounding the fire resistant door, which would prevent smoke or harmful gases entering the fire safe shelter. The tank would be sufficient to provide fresh air for all occupants during the danger period of the fire storm. Shelters (and any related equipment) would be maintained and tested annually or per the manufacturer's specifications, whichever is more conservative.

The proposed Plan includes optional emergency fire shelters at the camping areas of Corral Canyon and Malibu Bluffs, as well as along two trail alignments: Trail 2a6 adjacent to Murphy Way and Trail 13b adjacent to Corral Canyon Road. Although it is unclear that the appropriate agency would ultimately require emergency fire shelters in final design and operation of the Plan improvements, the fire shelters are identified on all project plans and in the PWP as optional. The optional emergency fire shelters are identified at the following locations:

- West of Murphy Way Road, Trail 2a6
- Corral Canyon Park, east of Corral Canyon Road, Trail 13b
- Corral Canyon Park, Camp Area 1
- Malibu Bluffs, Camp Area 3
- Malibu Bluffs, Camp Area 4

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In connection with the proposed trail and camp improvements, the County of Los Angeles Fire Department has stated its opposition to all the proposed parkland improvements unless certain mitigation measures are provided, including "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" and "Emergency fire shelters shall be located as approved by the Fire Department" (Exhibit 17: 6/2/09 Letter from Chief P. Michael Freeman to John Ainsworth, Dep. Dir., CCC; 04/21/10 Letter from County of Los Angeles Fire Department to Judi Tamasi, Santa Monica Mountains Conservancy). However, the LACFD has not provided an analysis or study, based on any legitimate fire science, that justify the need for fire shelters in this particular context, to assure the proposed camp and trail facilities are safe from fire hazard.

The proposed Plan includes a comprehensive fire protection program that includes, but is not limited to, a detailed evacuation plan, closure of the park on declared Red Flag Warning days/periods, prohibitions on camp fires, provision of non-flammable, flameless cook stations at campsites, availability and access to water and fire protection equipment, and on-site wildland fire-trained employee/camp host during the times when camping is permitted. In addition, the proposed camping areas at Corral Canyon Park and Malibu Bluffs are situated a short distance from Pacific Coast Highway, Malibu Road, the beach, and nearby accessible open areas with large expanses of irrigated, low-fuel landscapes that can also serve as a safe refuge in a wildfire emergency. It is considered very unlikely that a wildfire scenario would preclude safe relocation. Excluding the fire shelters, the proposed fire safety provisions of the Plan are thorough, reasonable, and practical for assuring maximum safety for life and property. The fire shelters are not a proven integral component to the parkland fire protection plans and are not necessary even as a last-resort fire protection measure. The Commission finds that the proposed siting and design of improvements and associated fire safety measures included in the PWP (excluding the optional fire shelters) minimizes risk to life and property from fire hazard, consistent with the relevant policies of the Coastal Act and Malibu LCP.

The Commission notes that it has been provided no precedent and it is aware of no precedent for on-site emergency fire shelters being required in public parklands or along public trails anywhere in the Malibu-Santa Monica Mountains area, or, for that matter, anywhere in the United States. In addition, no evidence has been provided that demonstrate the shelters would assure any significant increase in safety for park/trail users or function effectively for their intended purpose. Furthermore, there are no known building design standards for such fire shelters. Given the lack of evidence and precedents, the fire shelters are not considered a crucial component of fire protection planning for the proposed park and trail improvements.

The precedent of requiring fire shelters along public trail routes in natural parkland areas is particularly problematic. The proposed fire shelter structures and required fuel

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modification surrounding the shelters is completely incompatible with the natural landscape and scenic natural park setting and would result in the unnecessary removal of native habitat. The trails proposed in this plan do not present any greater risk relative to wildland fires, or any other risks for that matter, than any other trail in the Santa Monica Mountains or any other natural parkland area of California. There is a certain level of acceptable risk associated with hiking on trails in natural areas. It is not reasonable to expect a park agency or local jurisdiction to mitigate fire risks along public trails through the placement of fire shelters. In addition, from a practical matter, these shelters would have to remain unlocked and would be an attractive nuisance that would invite vandalism, graffiti, and other illicit activities.

The proposed fire protection measures of the Plan include reasonable provisions for the closure of parks to all recreational use, including trail use, during any Red Flag Day/period as declared for the Santa Monica Mountains area by the National Weather Service. Park properties would be posted and patrolled to inform visitors of closures.

Although the fire shelters at Corral Canyon have been located in disturbed areas, the fuel modification for the fire shelters would unavoidably impact ESHA. There are no alternative sites in the vicinity that would avoid these impacts. In addition, the fire shelters would adversely impact scenic resources. At this time there is no legitimate basis or justification for determining that fire shelters are necessary support facilities for the proposed campground and public trails to assure these facilities are safe from fire hazards. The removal of ESHA for the associated fuel modification, as well as the impact upon scenic resources, cannot be justified in this case. As such, for the reasons discussed above, the Commission finds that the proposed optional fire shelters at the camping areas of Corral Canyon and Malibu Bluffs, as well as along Trail 2a6 adjacent to Murphy Way and Trail 13b adjacent to Corral Canyon Road, are inconsistent with the hazard protection policies of the Coastal Act and Malibu LCP and must be denied. Therefore, **Suggested Modification 41, 52, and 53** are necessary to ensure these fire shelters are deleted from the proposed plan.

Hazards Implementation Measure 6 of the proposed PWP, as modified as suggested pursuant to Suggested Modification 31, requires that as part of a NOID for uses and/or improvements within any park in the Plan area, a facility-specific Fire Protection and Emergency Evacuation Plan shall be developed (inclusive of the elements discussed above) and submitted for review and approval to the appropriate fire agency(ies). Further, the approved facility-specific Fire Protection and Emergency Evacuation Plan shall be implemented with development of the approved facilities. In addition, since there is no substantial evidence in the record demonstrating that the use of propane cook-stoves at designated campsites is unsafe or represents more of a fire hazard than electric cook-stoves, Suggested Modification 31 includes a provision that allows the use of propane cook-stoves if it is determined that propane cook-stoves pose no greater fire hazard risk than electric stoves pursuant to a 1-yr. study and pilot project. Pursuant to Suggested Modification 31, the SMMC/MRCA, in consultation with California Department of Parks and Recreation, Los Angeles County Fire Department, and the

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State Fire Marshall, shall conduct a 1-yr. study and pilot project that analyzes the potential fire hazard and incidents/accidents associated with the use of propane cook-stoves versus electric cook-stoves at Camp Areas 1 and 2 of Malibu Bluffs and other public campgrounds to determine if the ban on the use of propane cook-stoves is warranted. The results of the study and pilot project shall be submitted to the Executive Director of the Coastal Commission for review and approval. If it is determined that propane cook-stoves pose no greater fire hazard risk than electric stoves, then the use of propane cook-stoves shall be allowed at all designated campsites throughout the Plan area. This will ensure that any propane ban or allowance will be evidentiary.

Implementation of the measures detailed in the PWP will minimize the risk of wildfire at these sites, will improve the ability to safely evacuate the area during wildfire events, and will improve the ability to fight fires on the properties and protect park property and neighboring resources irrespective of the cause or location of ignition. Implementation of the required enhanced construction features provided by the applicable codes and the mitigating fuel modification requirements will reduce the site's vulnerability to wildfire. It will also assist firefighters in their efforts to defend existing structures and reduce the risk to park visitors. As such, implementation of the Fire Protection and Emergency Evacuation measures included in the PWP and as modified as suggested will ensure the Plan's consistency with all applicable Coastal Act and City of Malibu LCP policies addressing fire hazards.

Conclusion

In conclusion, the Commission finds that the proposed Plan improvements have been sized, designed, and sited to minimize risks to life and property from geologic and flood hazard, and the PWP includes adequate measures to minimize grading and control runoff from the sites, thereby reducing potential site erosion, which might otherwise contribute to site instability. In addition, the Commission finds that the park improvements and the comprehensive fire protection implementation measures proposed, if modified as suggested, will minimize the risk of wildfire. As such, the Commission finds that the proposed Plan, if modified as suggested, is consistent with the Malibu LCP policies and provisions cited regarding hazards and geologic stability for the portions of the plan within the City of Malibu. Further, the Commission finds that the portion of the proposed Plan located in unincorporated areas, if modified as suggested, is consistent with Coastal Act policies cited, and the guidance provided by the cited policies of the Los Angeles County LUP regarding hazards and geologic stability.

3. Environmentally Sensitive Habitat Areas and Water Quality

a. Relevant Policies

The Coastal Act, Los Angeles County Malibu-Santa Monica Mountains Land Use Plan, and the City of Malibu certified LCP contain policies regarding the protection of environmentally sensitive habitats, coastal water quality, and aquatic resources. Due to

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the length of relevant policy language, the following relevant policies are attached as Exhibit 8 of this staff report.

Coastal Act § 30240, 30230, 30231, 30232, and 30236.

Los Angeles County LUP Policies P57, P58, P59, P60, P63, P68, P74, P76, P79, P81, P82, P84, and P86.

Malibu LCP Policies 3.1, 3.8, 3.9, 3.14, 3.15, 3.18, 3.20, 3.21, 3.22, 3.23, 3.24, 3.25, 3.26, 3.27, 3.28, 3.29, 3.30, 3.32, 3.33, 3.42, 3.43, 3.45, 3.47, 3.48, 3.50, 3.51, 3.53, 3.55, 3.56, 3.59, 3.60, 3.61, 3.62, 3.63, 3.64, 3.65, 3.95, 3.96, 3.97, 3.99, 3.100, 3.102, 3.104, 3.110, 3.111, 3.114, 3.115, 3.116, 3.117, 3.118, 3.119, 3.120, 3.121, 3.122, 3.123, 5.69, LIP Section 3.4.2.D.

b. Analysis

The Coastal Act, Los Angeles County LUP, and Malibu LCP require that environmentally sensitive habitat areas (ESHAs) must be protected against disruption of habitat values, that only uses dependent on the resource may be allowed within ESHA, and that proposed development adjacent to ESHA and parks shall be designed to prevent adverse impacts to those areas and be compatible with their continuance. The Coastal Act, Los Angeles County LUP, and Malibu LCP also require that new development maintain, and restore where feasible, the biological productivity of coastal waters by controlling runoff, maintaining vegetation buffers that protect riparian habitat, and minimizing alteration of streams.

Generally, the Plan area consists of coastal hillsides, canyons and terraces with habitat types ranging from highly disturbed within developed residential areas located along existing and proposed roadway trail corridors and the relative developed conditions of Ramirez Canyon Park, to stands of coastal sage scrub, chaparral and riparian corridors which have been preserved within the public parklands of the Plan area. The parklands subject to the proposed Plan improvements consist primarily of open, undeveloped coastal land and, as such, provide significant connecting links between the coast and large, undisturbed habitat areas in the Santa Monica Mountains. Though all the park properties have experienced some disturbance, the lands remain relatively undisturbed and collectively consist of vegetated coastal bluff terrain, oak woodland, steep canyons containing riparian oak-sycamore bottoms, and coastal sage scrub and chaparral ascending the canyon walls.

All proposed park improvement locations have been evaluated to ensure that park improvements have been appropriately located, to the extent feasible, in previously disturbed areas, and are appropriately setback from the top of bank of any adjacent stream, or outer edge of the riparian canopy, whichever is greater. Proposed park improvements and uses have been evaluated for potential impacts to habitat areas and special-status species. The Plan's new park facility development that has been sited primarily in disturbed areas, to the maximum extent feasible, and where only minimal grading and removal of natural vegetation are required to ensure that potential impacts

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to ESHA are avoided or minimized. Where it is not feasible to avoid impacts to ESHA, proposed improvements have been designed to minimize impacts to ESHA.

The City of Malibu LCP designates most of the parklands within the plan area as ESHA. In the unincorporated area, the riparian corridors of the various creeks are mapped as ESHA by the County of Los Angeles LUP. Both planning documents provide that notwithstanding the ESHA mapping, site specific information must be used to make an “on-the-ground” determination of the extent of habitat meeting the ESHA definition as part of specific development approvals. Malibu LUP Policies 3.1, 3.3, 3.4, 3.6, and 3.7 require a site-specific determination of ESHA. Policy P57 of the Los Angeles County LUP provides that any unmapped areas that meet the ESHA criteria and are identified through the biotic review process or other means shall be designated as ESHA.

To characterize the habitat of the plan area and determine the physical extent of habitat meeting the definition of ESHA, a general biological resources survey of the plan area and a general botanical and zoological survey of the plan area were conducted by consulting biologists on May 22 and 29, 2006, October 11 and 12, 2006, February 27, 2007, March 15, 2007 and September 3 and 8, 2009. In addition, a certified arborist performed a survey of the plan area and its trees on March 5 and 7, 2008 and September 3 and 8, 2009. The results of these surveys are contained in a Biological Technical Report (January 2010) and subsequent biological resource technical memorandums (August 2010) included in the Plan’s EIR. Exhibit 6 contains the vegetation mapping prepared by the consulting biologists that have been overlaid with aerial photos of the PWP area and includes the footprint of the proposed facilities. The proposed improvements included in the PWP were sited and designed in consideration of these mapped biological resources and ESHA determinations.

The Plan includes almost 2,000 acres of public recreational areas (parklands and trail corridors) in the Santa Monica Mountains and Malibu coastal area. Public parklands include Ramirez Canyon Park, Escondido Canyon Park, the Latigo Trailhead property, Corral Canyon Park, and the Malibu Bluffs Park. Analysis of the various Plan components by park location are discussed below, followed by a more general plan-wide analysis of the Plan’s consistency with the relevant resource protection and water quality policies of the Coastal Act and Malibu LCP.

Ramirez Canyon Park

Ramirez Canyon is the most developed of all the parks in the plan area. Previous development at Ramirez Canyon Park has resulted in a significantly disturbed and manicured environment. The majority of the Ramirez Canyon Park historic impacts have occurred since 1953, which began with the construction of the first residence. All residential structures and associated infrastructure were developed on the property prior to 1977; thus, most of Ramirez Canyon Park impacts occurred prior to the enactment of the Coastal Act in 1977. While the Commission has included Ramirez Canyon Park within mapped ESHA, the Malibu LCP does recognize that disturbed areas associated

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with existing, legally established uses are not considered to be ESHA. As such, much of the property within and directly adjacent to the existing development envelopes associated with the pre-Coastal Act establishment of Ramirez Canyon Park as an estate compound, as well as those adjacent areas subject to required fuel modification for existing structures, do not meet the Coastal Act and Malibu LCP definition of ESHA.

Proposed Phase 1 continues existing administrative and small outreach program uses at the park with only minor new improvements. Each existing structure would be retrofitted with monitored interior sprinklers for fire suppression and new hydrants would be installed at the park. Existing administrative office uses and current small events (e.g., public outreach, meetings, etc.) would continue. Phase 1 would also include installation of picnic tables (a maximum of 9 tables) that would be placed in seven day-use locations within the park, and a two-stall, self-contained restroom to replace an existing portable restroom. These proposed improvements would be situated in existing developed/disturbed areas of the site. Proposed Phase 2 improvements and uses would additionally include structural retrofits to the Peach House to be used as a fire shelter, conversion of a day-use picnic area to a camping area with two new accessible low-impact campsites, a new 10-space parking area, two new single-stall restrooms, three of the day-use areas would be improved to be made accessible, as well as large special events (sixteen (16) 200-person events per year). These proposed improvements would be situated in existing developed/disturbed areas of the site.

Ramirez Canyon Park is bisected by the City of Malibu-County of Los Angeles jurisdictional boundary. Proposed Day Use Area 2, which includes a two-stall self-contained restroom and three picnic tables in the northern meadow area of the park as part of Phase 1 and 2 improvements is located in unincorporated Los Angeles County. In addition, approximately 1.2 miles of trails and 300 lineal feet of creek restoration are also located in unincorporated Los Angeles County. All other Ramirez Park improvements are located in the City of Malibu.

Ramirez Creek

The reach of Ramirez Creek that traverses Ramirez Canyon Park was altered by a previous property owner. This included the placement of stone retaining walls along the banks and the planting of non-native vegetation. Although, as noted previously, the structures on the site and much of the other site development took place prior to the effective date of the Coastal Act, the stream alterations occurred later but were not approved in a coastal development permit. Because of the proximity of development to the stream, portions of the stream alterations serve to protect the structures from flood hazard and cannot feasibly be removed. The Plan proposes to retain those portions of the stream channelization that cannot feasibly be removed, to remove those portions that can be removed and lay back the stream slope to a more natural angle, and to carry out a restoration plan within Ramirez Canyon Park with the intention of enhancing degraded stream habitat and addressing flood and erosion hazards.

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Based upon a Riparian Habitat Evaluation study of Ramirez Canyon Park by LSA Associates (2002), unpermitted modifications in the subject stretch of Ramirez Creek, such as the installation of rock walls and gabion structures, had occurred subsequent to the effective date of the Coastal Act (January 1, 1977). The study estimates that these unpermitted modifications occurred within an approximately 5 feet wide area along the whole stream reach, and totaled approximately 0.18 acre of historic impacts to southern willow scrub. With the installation of unpermitted gabions and hard structures along the creek, stream flow rates increased due to the loss of infiltration, loss of sediment along the creek bank, and loss of dissipation by vegetation growing along the creek channel. The proposed Plan includes restoration/enhancement of the stream channel and mitigation, at a 3:1 ratio, for those historic impacts.

The Conservancy and MRCA have conducted a site-specific analysis of the modified stream channel at Ramirez Canyon Park to assess opportunities for streambed and riparian habitat restoration/enhancement and potential onsite and offsite flooding or erosional hazards that might result from removing or other modification of the channelization structures. A variety of creek bank treatments were evaluated for the stream restoration project including total naturalization of the creek bank and/or utilizing a combination and natural and hard structures to accomplish the restoration.

The proposed stream restoration/enhancement project includes restoration of creek areas where bank protection is not required for flood protection of existing structures/public use areas and where creek restoration will benefit the hydrology of the stream corridor and fish and wildlife habitat. The proposed plan includes removing existing gabions and gunite in creek bottoms to restore soft channel bottom and installing pervious boulder berms and/or log deflection structures throughout the creek to control stream degradation; creating areas of habitat enhancement in two areas (by the existing tennis court and at the southerly portion of the park) by removing walls and a pedestrian bridge, grading back the slopes, and removing non-native plants and planting native plants. The creek enhancement areas would also provide for educational displays associated with restoration and enhancement efforts. A tennis court and rock retaining wall, as well as an upland grass pathway across the creek from the tennis court, will be excavated and graded to an elevation slightly above the flow line of the creek. At these flow-line elevations, the area will receive creek flows that can establish and support southern willow scrub habitat. Once grading is complete, southern willow scrub vegetation is proposed to be planted to complement existing vegetation communities. Laying back the slopes in these particular areas will create a larger area for surface flows to slow down, allowing the hydrology and sediment deposition pattern to return to a more natural condition.

Upstream from the restoration/enhancement areas, removal of gabions and associated structures from Ramirez Canyon Creek, and the replacement of those structures with softer, more natural boulder berm structures and/or log deflection structures will facilitate restoration of the creek. Boulder berms are proposed to slow down stream flow and create rock-riffle-pool complexes within the channel, which is expected to facilitate

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sediment deposition and subsequent native recruitment of southern willow scrub vegetation. Several sections of the creek will be enhanced by the removal of non-native canary palms and establishment of native southern willow scrub species. The canary palms that are present range in size from several feet tall to 8 to 10 feet tall with a canopy cover of 8 feet in diameter. Palms on the creek bank to be removed will be replaced with appropriate southern willow scrub species using local willow cuttings. Southern willow scrub vegetation will be planted the created benches and banks, coast live oak and black walnut trees will also be planted on the slopes to provide transitional upland habitat.

Ramirez Creek within the park is bisected by the City of Malibu-County of Los Angeles jurisdictional boundary. Approximately 300 lineal feet of the approximately 1,250 lineal feet of proposed creek restoration is located in unincorporated Los Angeles County. The remainder is situated in the City of Malibu.

The proposed stream restoration and enhancement plan will result in approximately 0.11 acre of permanent impacts to the creek channel by placement of boulder berms and 0.17 acre of temporary impacts to the creek channel by the removal of hard structures and installation of boulder berms. In combination with the 0.18 acre of historic, unpermitted riparian habitat impacts discussed previously, total riparian/channel habitat impacts associated with Ramirez Creek is 0.46 acre. Temporary impacts will be mitigated at a 1:1 ratio on-site by re-establishing pre-construction stream morphology to the greatest extent practical. Permanent impacts will be mitigated at a 3:1 ratio on-site, as well as at King Gillette Ranch since there is not enough opportunity on-site to accommodate all of the required mitigation acreage. Restoration/mitigation of Ramirez Creek on-site, and at King Gillette Ranch, is included in the "Biological Concept Mitigation/Restoration Plan" (Dudek, July 2010) that has been prepared to serve as the PWP's biological restoration program framework described later in this section (This plan is included as Exhibit 18). In addition, preliminary construction drawings have been prepared for the Ramirez Creek restoration and enhancement plan, which are included in the PWP Concept Plan Set included as Exhibit 5. The plans have been reviewed by Commission staff biologist Dr. Jonna Engel and she has determined that they have been designed to enhance the function and habitat value of the creek and contain a strong implementation strategy, performance criteria, and monitoring program.

Coastal Act Section 30236, Malibu LUP Policy 3.32, and Los Angeles County LUP Policy P76 require that channelizations or other feasible substantial alterations of streams shall be prohibited except for the following uses where no other alternative exists: 1) necessary water supply projects; 2) flood protection for existing development, or 3) the improvement of fish and wildlife habitat. Any permitted stream alteration is required to minimize impacts to coastal resources and bioengineering alternatives for such alteration are preferred for flood protection over "hard" solutions. Additionally, the Malibu LCP includes provisions to guide implementation of a restoration plan for Ramirez Creek to correct the streambank disturbance and channelization performed by a previous property owner. The proposed creek restoration/enhancement plan would

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significantly improve the water quality and habitat value of Ramirez Creek within Ramirez Canyon Park, and is also considered a resource dependent use pursuant to the Coastal Act and the City of Malibu LCP. The restoration/enhancement approach would improve fish and wildlife habitat, replace hard structures with soft solutions wherever feasible, ensure impacts to coastal resources are minimized, and consistent with flood protection requirements of onsite development. In addition, numerous policies and implementation measures have been included in the PWP to ensure that water quality, sensitive habitat, and native trees are protected during project implementation. The Commission finds this element of the proposed Plan consistent with the applicable policies of the Coastal Act, Malibu LCP, and County LUP.

However, to ensure that the Biological Concept Mitigation/Restoration Plan (Dudek, July 2010) that has been prepared to serve as the Plan's biological restoration program framework described above is included in the PWP, **Suggested Modification 50** requires that it be included as Appendix B of the Plan. The proposed PWP contains implementation measures regarding Ramirez Creek that call for a comprehensive analysis to be conducted of the modified stream channel to assess opportunities for streambed and riparian habitat restoration and potential onsite and offsite flooding or erosional hazards that might result from removing or other modification of the channelization structures. These measures are required by the certified Malibu LCP. However, as part of the environmental review process associated with the PWP and in compliance with the Malibu LCP provisions, the SMMC/MRCA conducted a site-specific comprehensive analysis of the creek to identify opportunities and constraints. The PWP contains the proposed plan for restoring Ramirez Creek. As such, ESHA Implementation Measures 18 and 19 of the PWP are suggested to be modified, as detailed in **Suggested Modification 24**, requiring that a final, detailed Ramirez Creek Restoration Plan, consistent with the Biological Concept Mitigation/Restoration Plan, be prepared, submitted to the Commission as part of a NOID, and implemented. The suggested modification will ensure that the proposed restoration plan will be implemented at Ramirez Creek. Lastly, it is important to include a detailed description of the proposed Ramirez Creek Restoration element of the proposed plan in the Scope of Improvements subsection of the plan. As such, **Suggested Modification 44** is required.

Arizona-type Stream Crossing

Just north of the Ramirez Canyon Park entrance gate, the access road crosses Ramirez Creek. An existing Arizona-type stream-crossing exists in this location that is approximately 16-17 ft. wide, concrete, with an approximately 11"x11" trench drain with metal grate. Grouted rocks and boulders are situated at the upstream and downstream ends of the crossing. Like most of the development within the park, including the residential structures, the subject stream crossing pre-dates the effective date of the Coastal Act, as described in the historical analysis of the Riparian Habitat Evaluation study by LSA Associates (2002) conducted for the park.

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In response to preliminary comments by the LACFD to upgrade the road to a travel width of 20 ft., the proposed PWP states that the stream crossing would be replaced with a span bridge, or if permissible to the Coastal Commission, the existing facility would be widened as necessary to accommodate any safety requirements of appropriate fire agency. The proposed PWP Concept Plan drawings show both a span bridge, and widening to 20-ft., at that crossing location. The Malibu LCP provides specific development standards for minor alteration of natural streams for stream crossings intended to provide access to and within public recreation areas. Policy 3.33 of the Malibu LUP states that alteration of natural streams for the purpose of stream crossings shall be prohibited, except where the alteration is not substantial, there is no other feasible alternative to provide access to public recreation areas, and the alteration does not restrict movement of fish or other aquatic wildlife: Any other stream crossings shall be accomplished by bridging. The SMMC/MRCA has indicated that widening the crossing by 3-4 ft. on the upstream side and by 1-2 ft. on the downstream side in the area of the channel could be done with stonework and a steel cover plate. The widening locations around the existing Arizona crossing appear to be already modified by grouted stones and boulders. As such, the proposed widening to 20 ft., if required by the responsible fire agency, is considered a minor alteration for purposes of recreational access that would not have any substantially greater impacts to the stream or pose any greater obstruction for fish and wildlife than the existing, legal crossing. Therefore, minor widening of the existing crossing, as proposed, is consistent with the policies of the Malibu LCP. While a span bridge in this location would be considered an enhancement to stream function and habitat values, this alternative would be tremendously costly. However, in the long-term, it is important that funding and implementation opportunities for bridging at this location be explored and encouraged as a future park improvement endeavor to enhance Ramirez Creek.

To clarify that widening, not “repair and maintenance”, may be included as part of the Plan for the Arizona stream crossing, **Suggested Modification 52** is required to make the text correction on the PWP Concept Plans. Similarly, to clarify in the PWP Scope of Improvements subsection that the Arizona crossing may be widened in the short-term if required by the appropriate fire agency, but that opportunities for bridging should be explored as a long-term goal, **Suggested Modification 39** is required. In addition, **Suggested Modification 25** is required to correct the hydromodification implementation measure included in the PWP to reflect Malibu LCP Policy 3.33 regarding parameters for stream crossings and bridging.

Ramirez Canyon Park Wastewater Treatment

At Ramirez Canyon Park, the SMMC previously installed an advanced wastewater treatment and recycled water system which currently serves the park uses. The Plan includes connections to this existing system for all new restrooms at Ramirez Canyon Park. The existing system has been sized and designed to process the effluent from uses accommodating up to 200 people. Should any use or combination of uses at the park result in a capacity of visitors exceeding 200 people at any one time, temporary,

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portable restrooms are proposed to supplement the treatment capacity of the wastewater treatment system. Therefore, the proposed Plan will not result in any new wastewater discharge. Policies have been included in the PWP to ensure this, including a Water Quality Monitoring Program that includes provisions for quarterly analysis of water samples up- and down-stream of the site.

Kanan Dume Parking Areas

The proposed plan includes development of a trail linkage from Kanan Dume Road to Ramirez Canyon Park. This will allow walk-in access to the park. To facilitate access for trail users, three small parking areas are proposed along Kanan Dume Road that would provide a new public parking resource to accommodate a total of 14 vehicles (including 2 accessible spaces). Parking Area 1 is situated in the City of Malibu and is proposed to have a maximum footprint of 7,500 sq. ft. Parking Area 2 is situated in unincorporated Los Angeles County and is proposed to have a maximum footprint of approx. 5,500 sq. ft. Parking Area 3 is also situated in unincorporated Los Angeles County and is proposed to have a maximum footprint of approx. 7,000 sq. ft. The parking areas have been located and designed as pocket parking immediately adjacent to Kanan Dume Road, within informal roadside pull-off footprints that currently exist in these locations and are already disturbed. The three parking areas would involve approx. 700 cu. yds. of grading and 300 lin. ft. of retaining walls. Per LACFD fuel modification requirements, the parking areas will require a 10 ft. fuel modification zone. Minor encroachments into native vegetation (bigpod ceanothus chaparral) would result from the 10 ft. fuel modification requirements associated with Parking Areas 1 and 2 (234 sq. ft. encroachment for Parking Area 1 and 116 sq. ft. encroachment for Parking Area 2). However, these encroachments are not considered significant because they are within the existing Kanan Dume roadside corridor that would already be subject to vegetation management and fuel modification requirements typical for public roads and/or existing parking areas. Therefore, those encroachment areas are not considered ESHA under the Malibu LCP or the Coastal Act. The proposed parking areas have been sited and designed within an existing, disturbed development footprint, and no other alternative locations exist which could accommodate the proposed parking improvements without additional grading and removal of native vegetation and/or ESHA. With implementation of appropriate Best Management Practices and mitigation measures identified in the PWP the proposed parking improvements in this location are consistent with applicable Coastal Act and Malibu LCP policies relative to water quality protection. In addition, the proposed parking areas are relatively small and would not contribute to erosion or adversely impact water quality.

Via Acero Road Improvements

As described above, proposed Ramirez Canyon Park uses and improvements would consist of two phases. Phase 1 continues existing uses at the park (small events/programming not exceeding a maximum of 40 participants, plus 20 staff, baseline) with only minor new improvements. Phase 2 would increase specialized

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programs and uses, and would include the extension and widening (to 20 ft.) of Via Acero Road between Kanan Dume Road and Ramirez Canyon Park for purposes of secondary emergency access (pursuant to the initial recommendations of the LACFD and only if ultimately required by the responsible fire agency). The City of Malibu LCP specifies that options for additional Ramirez Canyon emergency ingress/egress to and from Kanan Dume Road over Via Acero Road shall be explored. Vehicle access across Via Acero would be utilized only for emergency ingress/ egress to Ramirez Canyon Park. The Conservancy/ MRCA would continue to adhere to a total 40 round trips/day standard for vehicles entering from Ramirez Canyon Road.

The Via Acero Road improvements, if required to be constructed by the responsible fire agency, would consist of extending the paved portion of Via Acero generally along the path of an existing dirt road for a maximum of approximately 1,400 ft. to intersect with Kanan Dume Road, and widening of Via Acero to a width as great as 20-ft over its entire length between Kanan Dume Road and Ramirez Canyon Road (approximately 2,904 ft). The amount of new pavement required to extend and widen the road would be approximately 30,538 sq. ft. and 3,157 sq. ft., respectively (a total of 40,434 sq. ft., which includes a 20% contingency). Grading for the Via Acero road improvements would consist of approximately 1,587 cu. yds. cut and 2,946 cu. yds. fill. All but a very small portion (approximately 90 linear feet adjacent to Kanan Dume) of the Via Acero Road improvements are located in the City of Malibu. A steel emergency access gate would be utilized near the Kanan Dume Road entrance, similar to those used by LACFD, California Division of Forestry, and other park agencies.

According to the EIR for the Plan, the Via Acero Road improvements would result in 0.17 acre of California sagebrush scrub vegetation that is part of a larger contiguous area of similar native vegetation. However, according to City of Malibu coastal development permit records, a new 5,880 sq. ft. single-family residence at 28460 Via Acero Road (APN 4467-033-017) was approved by the City of Malibu in 2007 (CDP 05-187; Gerlach). The approval included improvements to Via Acero to make the road 20 ft. wide per the requirements of the LACFD. Additionally, a 2,855 square foot cul-de-sac was approved at the end of the road to provide a turnaround for vehicles. It appears that the development pad and road improvements have since commenced at the site. In analyzing PWP project impacts, the impacts from existing and approved development in the vicinity must be considered. As such, when the approved residence at 28460 Via Acero Road and its associated road improvements and fuel modification requirements are factored in, new impacts that would result from the Via Acero Road improvements associated with the proposed Plan are reduced significantly, to 0.04 acre. However, the 0.04 acre is situated in close proximity to Kanan Dume Road and existing fuel modification areas associated with existing roads. This pattern of disturbance makes the native vegetation in this area isolated and marginal in habitat value. Therefore, this 0.04 acre area does not meet the Coastal Act or Malibu LCP definition of ESHA. According to a Native Tree Protection Plan (Dudek, August 2010) that was prepared for the project as part of the EIR, there is a native alder tree and a coast live oak tree adjacent to the existing road within the residentially developed portion of Via Acero Road that would

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likely require removal to widen the road to 20 ft.. However, there are no alternatives to avoid impacting these trees. As such, the Commission finds that in consideration of LACFD requirements for emergency access, the proposed Via Acero road improvements have been sited and designed to minimize grading and impacts to sensitive coastal resources to the maximum extent feasible, and is consistent with the applicable policies of the Malibu LCP and Coastal Act.

Ramirez Canyon Road Widening

The proposed Plan includes a preliminary design for emergency ingress/egress road improvements for the Ramirez Canyon community, proposed to be implemented during Phase 1 of the Plan. If required, actual improvements will be implemented consistent with the responsible fire agency's final design and timing requirements (based on agency jurisdiction). These preliminary design improvements include widening of the existing access road and removal of encroachments in the road easements, as necessary, to provide as great as 20-ft. clearance with minimum 50-ft. radius curves for emergency ingress/egress in the canyon along Delaplane Road and Ramirez Canyon Road, per the initial recommendations of the LACFD. These improvements (or other similar alternative measures required by the responsible fire agency consistent with Fire Code provisions) would enhance overall vehicular access along Ramirez Canyon Road and would provide for improved emergency access to and from the Ramirez Canyon corridor. Portions of Ramirez Canyon Road currently meet the 20-ft width roadway width, while other segments of the road would require application of additional asphalt concrete (AC) pavement along one or both sides of the road. To achieve a 20-ft width along the entire length of Ramirez Canyon Road from its intersection with Delaplane Road, 2,773 lineal feet of Ramirez Canyon Road (combined west and east side pavement additions) would require AC paving improvements. The area of improvements along the west portion of Ramirez Canyon Road would total 1,536 sq. ft. and improvements along the east portion of the road would total 7,910 sq. ft.. Similar to Ramirez Canyon Road, some portions of Delaplane Road do not currently meet the 20-ft width. As such, approximately 700 lineal feet of Delaplane Road would require AC paving improvements (combined west and east side pavement additions); with a total of 425 sq. ft. along the west and 1,520 sq. ft. along the east road portions. To comply with fire department requirements and obtain the desired uninterrupted roadway width of 20 ft, roadway improvements of both Ramirez Canyon Road and Delaplane Road would potentially be required along approximately 74% of the combined roadways.

If required by the responsible fire agency in order to maintain adequate room for operations during an emergency incident along Ramirez Canyon Road and/or Delaplane Road, additional widening to a total road width of approximately 26 feet would occur for a length of approximately 50 feet adjacent to all existing fire hydrant locations. Because the exact requirements and location of the 50-foot-long road widening in relation to the existing hydrants has not yet been determined by CAL FIRE or LACFD, in some cases a longer length/section of road-widening was analyzed in the EIR; this allows for a conservative, reasonable worst-case analysis of impacts, while

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providing flexibility to shift the road widening slightly in certain locations (e.g., to avoid impacts to an oak tree, etc.).

If required by the responsible fire agency, road widening improvements also include replacement of a wooden bridge on Ramirez Canyon Road, located just south of the intersection with Via Acero, with a 20-ft clear-width and 34-ft long, prefabricated steel bridge (or other similar alternative measures required by the responsible fire agency consistent with Fire Code allowances). If required, the new bridge would be constructed in two phases. The first phase (Phase A-bridge construction) would leave the existing bridge in place while the first half of the new bridge was constructed on the easterly side of the existing one. Once the new easterly half of the bridge is operational, the old timber bridge would be dismantled; Phase B-bridge construction would entail the construction of the second westerly half of the bridge. The existing footprint of the wood bridge is 10 feet, while the new bridge would be approximately 25 feet wide. The bridge would be designed to withstand a fire truck's weight and to better accommodate two-way vehicular traffic; it is proposed to span the creek bank and be located above the 100-year flood elevation. Bridge replacement at this crossing is consistent with Malibu LCP policies regarding utilizing bridges for stream crossings wherever feasible and locating bridge columns outside of streambeds and banks.

Very minor encroachments into California sycamore-coast live oak and coast live oak areas would result from the Ramirez Canyon Road widening improvements. These minor road widening encroachments would be limited to within disturbed areas already subject to fuel modification requirements associated with surrounding residential uses on both sides of the road. However, native trees are significant coastal resources that are afforded special protection under the Coastal Act and Malibu LCP. According to a Native Tree Protection Plan (Dudek, August 2010) that was prepared for the project as part of the EIR, a maximum of five native coast live oak trees and two native black walnut trees adjacent to the existing road would likely require removal to widen the road. Additionally, approximately 36 other native trees may be encroached upon as a result of the widening. These native tree impacts have been minimized to the maximum extent feasible and the PWP includes several implementation measures, consistent with the Malibu LCP, regarding the protection of native trees within the Plan area and requirements for mitigation should impacts be unavoidable. In addition, given the large number of native trees within the Plan area and potential impacts by encroachment, the Commission finds that it is important in this case to establish a methodology for discerning major and minor encroachments and appropriate corresponding mitigation and/or monitoring. To supplement the typical mitigation ratio requirement of 10:1 for native tree removal or significant damage that is included in the Malibu LCP, the SMMC/MRCA have suggested the following encroachment thresholds and corresponding mitigation requirements to be implemented Plan-wide.

- 10:1 mitigation for encroachments that occupy an area greater than 30% of the protected zone.
- 10:1 mitigation for encroachments that extend within 3 ft. of the tree trunk.
- 10:1 mitigation for the removal of a tree branch that exceeds 11-in. in diameter.

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- 5:1 mitigation for encroachments that occupy 10-30% of the protected zone.
- Monitoring (10 yr) of the health of native trees for encroachments that occupy less than 10% of the protected zone.

Commission staff ecologist, Dr. Jonna Engel, has reviewed this proposal and determined that the encroachment thresholds are appropriate and sensible, and the mitigation requirements are generous in providing mitigation for the impacts to native trees in the Plan area. As such, the Commission finds this strategy more specific, rigorous, and protective of trees than is required by the Malibu LCP or what the Commission typically requires in the Santa Monica Mountains of unincorporated Los Angeles County. **Suggested Modification 26** has been included to ensure this special native tree mitigation program is incorporated into the PWP as an implementation measure.

The Commission finds that the proposed improvements to Ramirez Canyon Road / Delaplane Road, if ultimately required, minimize impacts to coastal resources and are consistent with the applicable policies of the Malibu LCP.

Escondido Canyon Park

There presently are very few support facilities at Escondido Canyon Park, with the exception of one picnic table near the park entrance. The primary public amenity at the park is the trail system through the Escondido Canyon Natural Area that leads hikers, mountain bikers, and equestrians along a 1.3 mile trail through oak woodland, riparian woodland, and coastal sage scrub habitat to the spectacular, multi-tiered 150-ft Escondido Falls—the highest in the Santa Monica Mountains. Trail facilities are the only improvements proposed at Escondido Canyon Park at this time. These trail improvements are discussed later in this section.

Latigo Trailhead and Day Use Area

The proposed Latigo Trailhead improvements, located in the City of Malibu, are intended to support access and recreation in Escondido Canyon and the surrounding trail network. A parking area, day-use picnic areas, a self-contained single-stall restroom, and trail improvements are proposed. The Plan includes development of a new approximately 500 sq. ft. parking facility for 4 vehicles, including one accessible space. The parking facility is proposed adjacent to Latigo Canyon Road and would involve limited grading (85 cu. yds. fill) and construction efforts. To control access to the site when the Latigo Trailhead and Day Use Area is not open to the public, the parking facility includes a metal swing gate across the driveway to restrict entrance. A day use/picnic area with approximately three picnic tables is planned adjacent to, and would be readily accessed from, the proposed parking area. An accessible 4-ft wide trail would allow access from the parking area to the upper promontory with four additional day/use picnic sites and a self-contained single-stall restroom. The restroom area would also involve limited grading (30 cu. yds. cut) and brush clearance for fire safety purposes (20 ft.). The proposed parking and restroom improvements, including fuel modification, have

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been sited and designed in an existing disturbed area of the property, outside of all mapped ESHA, and more than 25 feet from the top of bank of an adjacent stream, as required by Section 3.4.2.D.5.a. of the Malibu LCP. The 4-ft. wide accessible trail between the parking area and the restroom/upper day-use site would encroach into 0.02 acre of California sagebrush scrub/Sycamore woodland ESHA. Although the trail is a resource-dependent use and allowed in ESHA, the trail has been sited and designed to follow the site's natural contours and minimize encroachment into ESHA to the maximum extent feasible, consistent with the trail policies of the Malibu LCP. There is no alternative trail configuration that would avoid this impact. In addition, grading and site disturbance has been minimized. BMP's and mitigation measures have been included in the PWP in ensure improvements at this site are developed in a manner that minimizes and mitigates impacts to sensitive habitat and water quality. As such, the Commission finds the proposed improvements at the Latigo Trailhead property consistent with the applicable policies of the Malibu LCP.

Corral Canyon Park

With the exception of approximately 6.4 miles of Corral Canyon trails situated in unincorporated Los Angeles County, all proposed Corral Canyon Park improvements are located in the City of Malibu.

Corral Canyon Park Parking Improvements, Accessible Walkway and Drop-Off Area

A number of existing support facilities exist at the Sara Wan trailhead located within Corral Canyon Park that currently facilitate public use of the park including a public parking lot, self-contained restroom, drinking fountain, and an accessible picnic area.

The proposed Plan includes an accessible drop-off point where an existing maintenance road (located east of Corral Canyon Creek) would be upgraded to provide for one drop-off point from which visitors with special needs could gain access to the rest of the park. Given the proximity of this area to the creek, the improvements would consist of leveling the already disturbed area and providing adequate area for vehicle turnaround. In addition, the proposed Plan includes improvements to an existing trail and walkway partially along PCH to provide access for people with disabilities from the existing Corral Canyon Park parking lot to the proposed accessible drop-off point. The existing trailhead parking facility at Corral Canyon Park would be restriped and a vegetated island would be converted to a decomposed granite parking area so that existing and proposed parking would total 34 spaces. The Plan includes a Park Administration/Employee Quarters building (approximately 600 sq. ft.) at the Sara Wan trailhead, located approximately 50 ft. north of the existing restaurant fronting on PCH. A two-stall restroom would be installed immediately to the east of the proposed Park Administration/Employee Quarters building. And a proposed fire truck storage shed (675 sq. ft.) would be located immediately to the east of the proposed Park Administration/Employee Quarters building and restroom facilities. These proposed improvements are situated in the City of Malibu.

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Consistent with the Malibu LCP, the proposed Park Administration/Employee Quarters building, fire truck storage shed, and restroom facilities have been located in an existing disturbed development footprint (an existing, paved parking area) and are located and designed so as to not impact ESHA. Fuel modification associated with Park Administration/Employee Quarters and Fire Truck Storage Shed improvements at Corral Canyon Park would likely be limited to areas already subject to fuel modification requirements associated with the adjacent restaurant and RV facility due to the topography and presence of a riparian corridor to the north. However, if a full 200 ft. zone of fuel modification is required by the responsible fire agency for the proposed structures, it would result in an incremental increase in removal of native vegetation for fuel modification. There is no alternative that would avoid this potential impact to ESHA.

Corral Canyon Park Camp/ Day Use Areas

In Corral Canyon Park, the proposed Plan includes one camp area that would include a total of 17 campsites on a bluff overlooking the Pacific Ocean. The camp area is planned on an elevated terrace above PCH and would include 12 large campsites and 5 small campsites, two emergency fire shelters, and a self-contained double-stall restroom meeting the technical specifications for accessibility. The trail from the existing parking area to this camp area would also be improved for accessibility. The camp area would be located along and adjacent to the existing primary trail alignment in the southern portion of the Park. All campsites have been clustered in a single area of the park to minimize impacts, to have better access for restroom servicing and facilitate easier oversight/management, lower operational costs, and maximize the effectiveness of fire protection and evacuation in the case of emergencies. Overnight camping at Corral Canyon Park would be allowed by reservation and/or by on-site registration (e.g., by an on-site Camp Host or Park staff only). A board or kiosk at the parking area would designate which campsites have been reserved. The northern day use/picnic area (Day Use Area 2), located northwest of the camp area, would include picnic tables and is also proposed along the primary trail alignment, just up-canyon of the trailhead.

Malibu LCP Policy 5.69 specifically defines low-impact campsites and associated support facilities as resource dependent uses. Policy 3.5.2.D.7.a further specifies that resource dependent park uses and necessary support facilities associated with resource dependent park uses, located within or adjacent to areas mapped as ESHA, must be sited and designed to avoid significant disruption of habitat values and that appropriate mitigation be applied should there be unavoidable impacts. These policies recognize trails and low-impact campsites, and associated support facilities, as resource dependent uses and as such acknowledge that such uses may occur within ESHA. Consistent with these policies, the proposed improvements have been sited and clustered to minimize disturbance to sensitive habitat areas to the maximum extent feasible. Where ESHA impacts are unavoidable, implementation measures have been included in the PWP that require habitat impact mitigation, at a 3:1 ratio, for adverse

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impacts to ESHA. As such, the Commission finds these improvements consistent with the Coastal Act and the Malibu LCP.

The proposed Plan includes three optional emergency fire shelters at Corral Canyon Park. Two fire shelters are situated in a central portion of the proposed camp area, and the other is situated on Trail 13b just east of Corral Canyon Road. In connection with the proposed trail and camp improvements, the County of Los Angeles Fire Department has stated its opposition to all the proposed parkland improvements unless certain mitigation measures are provided, including "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" and "Emergency fire shelters shall be located as approved by the Fire Department" (Exhibit 17: 6/2/09 Letter from Chief P. Michael Freeman to John Ainsworth, Dep. Dir., CCC; 04/21/10 Letter from County of Los Angeles Fire Department to Judi Tamasi, Santa Monica Mountains Conservancy).

The proposed optional fire shelters at Corral Canyon Park have been sited outside of areas considered ESHA pursuant to a site-specific biological assessment. However, the 200 ft. of brush clearance around each of the shelters would impact areas considered ESHA. The two adjacent shelters in the camp area would impact approximately 1.3 acres of ESHA, and the fire shelter at Trail 13b east of Corral Canyon Road would impact approximately 0.5 acre of ESHA. There are no alternative sites in the vicinity that would avoid these impacts.

As outlined in Malibu LCP Policy 3.4.2.D.7(a), necessary support facilities associated with resource dependent low-impact camping and park uses are authorized within or adjacent to ESHA. Assuming fire shelters were the only alternative, or the preferred alternative, to assure the proposed camp and trail facilities are safe from fire hazards, then the fire shelters could be considered an allowable use within or adjacent to ESHA. However, the LACFD has not provided an analysis or study, based on any legitimate fire science, that justify the need for fire shelters in this particular context, to assure the proposed camp and trail facilities are safe from fire hazard.

As discussed in the Hazards section of this report, the PWP includes a comprehensive fire protection program for the proposed campgrounds that includes, but is not limited to, a detailed evacuation plan, closure of the park on declared Red Flag Warning days/periods, prohibitions on camp fires, provision of non-flammable, flameless cook stations at campsites, availability and access to water and fire protection equipment, and on-site wildland fire-trained employee/camp host during the times when camping is permitted. In addition, the proposed camping area at Corral Canyon Park is situated a short distance from Pacific Coast Highway and nearby accessible open areas with large expanses of irrigated, low-fuel landscapes that can also serve as a safe refuge in a wildfire emergency. It is considered very unlikely that a wildfire scenario would preclude safe relocation. Excluding the fire shelters, the proposed fire safety provisions of the Plan are thorough, reasonable, and practical for assuring maximum safety for life and property. The fire shelters are not a proven integral component to the parkland fire

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protection plans and are not necessary even as a last-resort fire protection measure. As discussed in more detail in the Hazards section of this staff report, the Commission finds that the proposed siting and design of improvements and associated fire safety measures included in the PWP (excluding the optional fire shelters) minimizes risk to life and property from fire hazard and is consistent with the relevant policies of the Coastal Act and Malibu LCP.

The Commission notes that it has been provided no precedent and it is aware of no precedent for on-site emergency fire shelters being required in public parklands or along public trails anywhere in the Malibu-Santa Monica Mountains area, or, for that matter, anywhere in the United States. In addition, no evidence has been provided that demonstrate the shelters would assure any significant increase in safety for park/trail users or function effectively for their intended purpose. Furthermore, there are no known building design standards for such fire shelters. Given the lack of evidence and precedents, the fire shelters are not considered a crucial component of fire protection planning for the proposed park and trail improvements.

The precedent of requiring fire shelters along public trail routes in natural parkland areas is particularly problematic. The proposed fire shelter structures and required fuel modification surrounding the shelters is completely incompatible with the natural landscape and scenic natural park setting and would result in the unnecessary removal of native habitat. The trails proposed in this plan do not present any greater risk relative to wildland fires, or any other risks for that matter, than any other trail in the Santa Monica Mountains or any other natural parkland area of California. There is a certain level of acceptable risk associated with hiking on trails in natural areas. It is not reasonable to expect a park agency or local jurisdiction to mitigate fire risks along public trails through the placement of fire shelters. In addition, from a practical matter, these shelters would have to remain unlocked and would be an attractive nuisance that would invite vandalism, graffiti, and other illicit activities.

The proposed fire protection measures of the Plan include reasonable provisions for the closure of parks to all recreational use, including trail use, during any Red Flag Day/period as declared for the Santa Monica Mountains area by the National Weather Service. Park properties would be posted and patrolled to inform visitors of closures.

Although the fire shelters at Corral Canyon have been located in disturbed areas, the fuel modification for the fire shelters would unavoidably impact ESHA. At this time there is no legitimate basis or justification for determining that fire shelters are necessary support facilities for the proposed campground and public trails to assure these facilities are safe from fire hazards. The removal of ESHA for the associated fuel modification cannot be justified in this case. As such, the Commission finds that the proposed fire shelters at Corral Canyon are inconsistent with the ESHA protection policies of the Coastal Act and Malibu LCP and must be denied. Therefore, **Suggested Modification 41, 52, and 53** are necessary to ensure these fire shelters are deleted from the proposed plan.

Malibu Bluffs

At the Conservancy's Malibu Bluffs property, the proposed Plan includes campsites, two new parking and camp host/park administration areas adjacent to PCH, restrooms, water tanks, optional emergency fire shelters, a picnic area, trails, and pedestrian foot bridges. Trails and foot bridges will be discussed later in this chapter. All proposed improvements in this Park are located in the City of Malibu.

The Plan includes 4 camps areas at Malibu Bluffs that would include a total of 35 campsites, 20 of which would be designed as large campsites. Camp Area 1 would consist of 4 small campsites, 6 large campsites, and a single restroom located near the proposed Parking Area 1 on the west bluff portion of the property. Camp Area 2 would include 6 small campsites and 5 large campsites located on the west bluff, east of the ravine and across the pedestrian bridge, and a restroom. Camp Area 3 is proposed on the northeast bluff portion of the property and would include 5 large campsites, a restroom, and an emergency fire shelter. Camp Area 4 is proposed on the southeast bluff portion of the property and would include 5 small campsites, 4 large campsites, a restroom, and 2 emergency fire shelters. Overnight camping at Malibu Bluffs would be allowed by reservation and/or by on-site registration (e.g., by an on-site Camp Host or Park staff only).

The Plan includes development of 2 new parking areas on the Bluffs property, all of which are accessed from, and adjacent to, PCH. The first parking area (Parking Lot 1) is proposed on the west bluff portion of property and would accommodate 26 vehicle spaces, including 3 accessible spaces, within approximately 5,325 sq. ft. Two Park Administration/ Employee Quarters buildings (approx. 600 sq. ft. each) and a single self-contained restroom are proposed in the southwest corner of the parking area. Immediately east of the Park Administration/ Employee Quarters building, within the overflow parking area, a Fire Truck Storage Shed (675 sq. ft.) is proposed. Parking Lot 1 includes a "flex-area," which would allow the Conservancy/ MRCA to utilize an approximate 200 sq. ft. area which would be striped for parking and/ or for the installation of one storage shed/enclosure, which would house park administration equipment and supplies. In addition, a 10,000 gallon water tank is proposed adjacent to the northern border of Parking Area 1. A camp host site and double-stall restroom are proposed along the east side of Parking Area 1 and off the trail from the parking lot to the proposed Camping Area 1.

The second parking area would be located on the east bluff portion of the property. The lot would be approximately 6,980 sq. ft. and would include 14 vehicle spaces, including 3 accessible spaces. A camp host site and a second 10,000 gallon water tank are proposed just south and west, respectively, of this parking area; a single restroom would be located adjacent to the eastern border of the parking area.

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A new day use/picnic area is also proposed at Malibu Bluffs. The new day-use area would be located on the lower portion of the east bluff and be improved with picnic amenities and would be accessed from Malibu Road or the upper east bluff via an existing trail. In addition, a two-stall self-contained restroom facility would be located along Malibu Road would be accessed from Malibu Road or from the new trail connections proposed between Camp Area 1 and Camp Area 4. The restrooms would be located in immediate proximity to the existing vertical accessway to the beach located across the street.

Proposed improvements at Malibu Bluffs have been sited and designed to locate new facilities within previously disturbed and level areas of the property to the maximum extent feasible. Nonetheless, proposed improvements will result in some impacts to ESHA (0.07 acre) associated with a foot bridge and trail between campsites and a picnic area. Several areas mapped as ESHA in the EIR do not meet the definition of ESHA under the Malibu LCP. The park entrance road for Parking Area 3 would result in very minor encroachment into an isolated patch of laurel sumac/California sagebrush vegetation located directly adjacent to Pacific Coast Highway. Similarly, required fuel modification at Camp Area 4 would result in encroachment into another very isolated patch of laurel sumac vegetation. Due to their isolated nature in areas that are surrounded by disturbance, these areas are not considered part of any larger native vegetation community occurring on the Malibu Bluffs site. No special-status plant or wildlife species were recorded in these areas during biological resource surveys conducted in 2009 and 2010. Therefore, these native vegetation patches of laurel sumac scrub and California sage do not meet the City of Malibu LCP's definition of ESHA.

Malibu LCP Policy 5.69 specifically defines low-impact campsites and associated support facilities as resource dependent uses. Policy 3.5.2.D.7.a further specifies that resource dependent park uses and necessary support facilities associated with resource dependent park uses, located within or adjacent to areas mapped as ESHAs, must be sited and designed to avoid significant disruption of habitat values and that appropriate mitigation be applied should there be unavoidable impacts. These policies recognize trails and low-impact campsites, and associated support facilities, as resource dependent uses and as such acknowledge that such uses may occur within ESHA. Consistent with these policies, the proposed improvements that will minimally impact ESHA are considered resource dependent uses and allowed in ESHA pursuant to the Malibu LCP. The proposed resource dependent improvements have been sited and clustered to minimize disturbance into sensitive habitat areas to the maximum extent feasible. Where ESHA impacts are unavoidable, implementation measures have been included in the PWP that require habitat impact mitigation, at a 3:1 ratio, for adverse impacts to ESHA. In addition, grading and site disturbance has been minimized to the maximum extent feasible and implementation measures have been included in the PWP to minimize impacts to water quality. As such, the Commission finds these improvements consistent with the Coastal Act and the Malibu LCP.

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The proposed Plan includes two optional emergency fire shelters at Malibu Bluffs Park situated in two areas: Camp Area 3 and Camp Area 4 within the central portion of the property. The LACFD has indicated that 200 feet of brush clearance would be required around the fire shelters. In connection with the proposed trail and camp improvements, the County of Los Angeles Fire Department has stated its opposition to all the proposed parkland improvements unless certain mitigation measures are provided, including "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" and "Emergency fire shelters shall be located as approved by the Fire Department" (Exhibit 17: 6/2/09 Letter from Chief P. Michael Freeman to John Ainsworth, Dep. Dir., CCC; 04/21/10 Letter from County of Los Angeles Fire Department to Judi Tamasi, Santa Monica Mountains Conservancy).

The proposed optional fire shelters and their associated 200 ft. of fuel modification at Malibu Bluffs have been sited outside, but adjacent to, areas considered ESHA pursuant to a site-specific biological assessment. As outlined in Malibu LCP Policy 3.4.2.D.7(a), necessary support facilities associated with resource dependent low-impact camping and park uses are authorized within or adjacent to ESHA. Assuming fire shelters were the only alternative, or the preferred alternative, to assure the proposed camp and trail facilities are safe from fire hazards, then the fire shelters could be considered an allowable use within or adjacent to ESHA. However, the LACFD has not provided an analysis or study, based on any legitimate fire science, that justify the need for fire shelters in this particular context, to assure the proposed camp and trail facilities are safe from fire hazard.

As discussed in the Hazards section of this report, the PWP includes a comprehensive fire protection program for the proposed campgrounds that includes, but is not limited to, a detailed evacuation plan, closure of the park on declared Red Flag Warning days/periods, prohibitions on camp fires, provision of non-flammable, flameless cook stations at campsites, availability and access to water and fire protection equipment, and on-site wildland fire-trained employee/camp host during the times when camping is permitted. In addition, the proposed camping area at Malibu Bluffs is situated a short distance from Pacific Coast Highway, Malibu Road and the beach, and Pepperdine University with its large expanse of irrigated landscaping that would serve as a safe refuge in a wildfire emergency. It is considered very unlikely that a wildfire scenario would preclude safe relocation. Excluding the fire shelters, the proposed fire safety provisions of the Plan are thorough, reasonable, and practical for assuring maximum safety for life and property. The fire shelters are not a proven integral component to the parkland fire protection plans and are not necessary even as a last-resort fire protection measure. As discussed in more detail in the Hazards section of this staff report, the Commission finds that the proposed siting and design of improvements and associated fire safety measures included in the PWP (excluding the optional fire shelters) minimizes risk to life and property from fire hazard and is consistent with the relevant policies of the Coastal Act and Malibu LCP.

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The Commission notes it has been provided no precedent and it is aware of no precedent for on-site emergency fire shelters being required in public parklands or along public trails anywhere in the Malibu-Santa Monica Mountains area, or, for that matter, anywhere in the United States. In addition, no evidence has been provided that demonstrate the shelters would assure any significant increase in safety for park/trail users or function effectively for their intended purpose. Furthermore, there are no known building design standards for such fire shelters. Given the lack of evidence and precedents, the fire shelters are not considered a crucial component of fire protection planning for the proposed park and trail improvements.

At this time there is no legitimate basis or justification for determining that fire shelters are necessary support facilities for the proposed campground and public trails to assure these facilities are safe from fire hazards. As such, the Commission finds that the proposed fire shelters at Malibu Bluffs are inconsistent with the ESHA protection policies of the Coastal Act and Malibu LCP and must be denied. Therefore, **Suggested Modification 41, 52, and 53** are necessary to ensure these fire shelters are deleted from the proposed plan.

Pedestrian Trail Bridges

The Plan includes construction of twelve (12) potential pedestrian trail bridges; one at Ramirez Canyon Creek along the trail alignment from Kanan Dume to Ramirez Canyon Park, three at Escondido Creek along trail alignment 4 in the northern portion of Escondido Canyon Park, four at Corral Creek along the Beach to Backbone Trail (one along trail alignment 11a, one along trail alignment 14, and two along trail alignment 15), and four at Malibu Bluffs. Pedestrian bridges would span the creeks and would not involve encroachment into the creek area. No permanent obstructions would be placed within the creeks, and all vehicular bridges would be located above the 100-year flood plain. The Plan includes stone creek crossings intended to allow for creek passage by hikers, which would vary based on each particular creek crossing. The stones would be wedged, anchored, or otherwise embedded into the creek material to prevent slippage and to be stable for walking, and so as not to significantly alter the course of any stream or creek. As such, these pedestrian trail bridges included in the Plan are consistent with the Malibu LCP because they are minor in nature, provide public recreational access, and do not adversely impact stream habitat or riparian vegetation.

Trails

The proposed trail improvements would complete trail connections for the Coastal Slope Trail and its ultimate connection to the Beach to Backbone Trail (in Corral Canyon), which would provide access to and between adjacent urban areas of Los Angeles and Ventura Counties, the larger Santa Monica Mountains National Recreation Area, and to the shoreline within the City of Malibu. Some of the trail alignments identified in the Plan area are critical connections for completing the Coastal Slope Trail and would require either new land acquisitions from private and public property owners or new OTDs for

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formal public access trail easements (e.g., Trails 1a, 9a/b, 10b, and 11a). For these trail alignments, additional properties and/or trail easements and/or agency agreements would need to be secured by the Conservancy/ MRCA before the trails could be constructed. Once the land is acquired, or the trail easements accepted, all policies and implementation measures of the PWP and construction techniques described herein would be applied to implementation of proposed trail improvements.

The majority of the new trails are proposed to be 5-ft wide, although in some cases they are proposed to be 4-ft wide and would include periodic wider portion where trail users could pass each other. The Plan includes trails proposed in accordance with current accessibility guidelines and technical requirements. Proposed accessible trails connect with other proposed accessible facilities, including campsites, restrooms, and parking areas. Standard trail construction techniques would be incorporated where retaining structures are required for trail construction. The proposed PWP includes several policies and implementation measures regarding trail location, development, and design to ensure impacts to ESHA and water quality are avoided or minimized to the maximum extent feasible.

Although trails are a resource-dependent use and are permitted by the Malibu LCP in environmentally sensitive habitat areas (ESHA), proposed trails identified in the Plan have been located and designed to avoid or minimize impacts to ESHA by utilizing established trail corridors, following natural contours, and avoiding naturally vegetated areas with significant native plant species to the maximum extent feasible, consistent with the ESHA protection policies of the Coastal Act, Los Angeles County LUP, and Malibu LCP. Pursuant to the PWP, trail construction is required to be designed consistent with the Park and Trail Accessibility Design Guidelines document prepared by Moore Iacofano Goltsman, Inc. for the Plan area. These guidelines provide specific trail design measures to ensure resource protection through appropriate drainage and control measures, and adherence to current design practices for mountain trail design including addressing drainage, erosion control and dissipation.

The proposed Plan includes an optional emergency fire shelter on Trail 2a6 west of Murphy Way Road near Escondido Canyon Park, and another emergency fire shelter at Trail 13b east of Corral Canyon Road in Corral Canyon. The fire shelters along Trail 2a6 and Trail 13b have been sited outside of areas considered ESHA pursuant to a site-specific biological assessment. However, the 200 ft. of brush clearance around each of the shelters would impact areas considered ESHA. The Trail 2a6 fire shelter would impact approximately 0.89 acre of ESHA, and the fire shelter at Trail 13b east of Corral Canyon Road would impact approximately 0.5 acre of ESHA. There are no alternative sites in the vicinity that would avoid these impacts.

As discussed previously, The Commission notes that it has been provided no precedent and it is aware of no precedent for on-site emergency fire shelters being required in public parklands or along public trails anywhere in the Malibu-Santa Monica Mountains area, or, for that matter, anywhere in the United States. In addition, no evidence has

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been provided that demonstrate the shelters would assure any significant increase in safety for park/trail users or function effectively for their intended purpose. Furthermore, there are no known building design standards for such fire shelters. Given the lack of evidence and precedents, the fire shelters are not considered a crucial component of fire protection planning for the proposed park and trail improvements.

The precedent of requiring fire shelters along public trail routes in natural parkland areas is particularly problematic. The proposed fire shelter structures and required fuel modification surrounding the shelters is completely incompatible with the natural landscape and scenic natural park setting and would result in the unnecessary removal of native habitat. The trails proposed in this plan do not present any greater risk relative to wildland fires, or any other risks for that matter, than any other trail in the Santa Monica Mountains or any other natural parkland area of California. There is a certain level of acceptable risk associated with hiking on trails in natural areas. It is not reasonable to expect a park agency or local jurisdiction to mitigate fire risks along public trails through the placement of fire shelters. In addition, from a practical matter, these shelters would have to remain unlocked and would be an attractive nuisance that would invite vandalism, graffiti, and other illicit activities.

The proposed fire protection measures of the Plan include reasonable provisions for the closure of parks to all recreational use, including trail use, during any Red Flag Day/period as declared for the Santa Monica Mountains area by the National Weather Service. Park properties would be posted and patrolled to inform visitors of closures.

Although the fire shelters at the proposed trail locations have been located in disturbed areas, the fuel modification for the fire shelters would unavoidably impact ESHA. At this time there is no legitimate basis or justification for determining that fire shelters are necessary support facilities for the public trails to assure these facilities are safe from fire hazards. The removal of ESHA for the associated fuel modification cannot be justified in this case. As such, the Commission finds that the proposed fire shelters at the trail locations are inconsistent with the ESHA protection policies of the Coastal Act and Malibu LCP and must be denied. Therefore, **Suggested Modification 41, 52, and 53** are necessary to ensure these fire shelters are deleted from the proposed plan.

Plan-Wide Resource Protection Measures

Consistent with the ESHA protection policies of the Coastal Act and Malibu LCP, the proposed Plan includes public access and recreational facility improvements that have been sited and designed to protect and minimize impacts to ESHA. The Plan includes development of park improvements that include primarily low-intensity uses consisting of access trails that are sited and designed to blend with the natural topography of trail corridors and to minimize impacts to sensitive habitat areas. Camping facilities have been limited in size and location, and clustered in consideration of geologic and natural resource constraints of the park properties. Proposed support facilities have been sited and designed to minimize adverse impacts to ESHA by utilizing existing facilities and/or

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disturbed areas. New support facilities are proposed at park entrances, at existing primary trailheads and within previously disturbed areas, are adequately setback from the top of bank of adjacent streams, or outer edge of the riparian canopy, whichever is greater, consistent with development standards contained in the Malibu LCP, and are sited on level terrain to the maximum extent feasible to minimize the need for grading and impacts to water quality and sensitive habitat areas. The Plan includes provisions for very limited motorized vehicular access, signs and fencing, to support accessibility services, public safety, or to ensure habitat protection or restoration success. Fencing may be permitted where found wildlife movement-friendly and where found necessary to minimize potential conflicts with adjacent land uses.

All proposed park improvement locations have been evaluated by a qualified biologist to ensure that park improvements have been appropriately located, to the extent feasible, in previously disturbed areas, and are appropriately setback from the top of bank of any adjacent stream, or outer edge of the riparian canopy, whichever is greater. In addition, the PWP includes policies and implementation measures to ensure that as PWP projects are brought forward for implementation, that proposed park improvements and uses are evaluated by a qualified biologist for potential impacts to habitat areas and special-status species and that mitigation measures are implemented to ensure resource impacts are appropriately avoided or minimized and mitigated. However, several ESHA policies and implementation measures included in the proposed PWP reference and rely upon provisions of the Malibu LCP. Since the PWP is intended to be a stand-alone planning document for the Plan area (that is itself consistent with the Malibu LCP or Coastal Act for unincorporated areas), it is necessary to replace LCP references with the PWP policy or implementation measure. As such, **Suggested Modification 16** is required to incorporate the Coastal Act and Malibu LCP definition and protection policy of ESHA as a policy of the PWP. **Suggested Modification 18** is required to include the specific criteria for ESHA determinations from the Malibu LCP as a PWP policy. Regarding the ESHA impact and mitigation implementation measures of the PWP (Measures 8 and 24), **Suggested Modification 22** is required to consolidate two separate PWP implementation measures into one comprehensive measure that clarifies the ESHA impact assessment and mitigation requirements/plan components and omits elements that are already addressed elsewhere in the PWP. Lastly, **Suggested Modification 23** is required to omit reference to grading permit issuance (not applicable in the Plan area) regarding the requirement for retention of a biological monitor during ground disturbing activities, and to simplify the implementation measure language in general.

All impacts to ESHA will be appropriately mitigated pursuant to the PWP and as detailed in the Biological Concept Mitigation/Restoration Plan (Dudek, July 2010) that has been prepared to serve as the Plan's biological restoration program framework. The Biological Concept Mitigation/Restoration Plan is complete with a breakdown of PWP project impacts and required mitigation, identification of restoration/mitigation sites and description of existing conditions, mitigation goals for each restoration area, performance criteria, implementation strategy for each mitigation site, maintenance and monitoring program, and contingency measures. The Plan provides for habitat

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restoration and required mitigation to be conducted at five sites in the Plan area: Ramirez Canyon Park, Malibu Bluffs Park, Corral Canyon Park, and at off-site locations within the Coastal Zone at Tuna/Las Flores Canyon and King Gillette Ranch. Selection criteria included soil type, hydrology, historic vegetation, non-native vegetation and native habitat adjacency, land use, site accessibility, and water source availability.

The Plan's Biological Concept Mitigation/Restoration Plan includes restoration of California sagebrush (CSB) at Malibu Bluffs as a fully functioning habitat with high native cover that is sufficient to resist future non-native invasion. CSB would also be restored at Corral Canyon Park as highly diverse habitat, however, the habitat would be dominated and/or have a significant representation of purple sage. Purple sage vegetation associations with coyotebush (*Baccharis pilularis*), California sagebrush, and ashy leaf buckwheat will provide the majority of native cover. In addition to restoring CSB vegetation at Corral Canyon Park, native purple needlegrass (*Nassella pulchra*) grasslands would be restored and enhanced on the site. The Tuna/Las Flores Canyon site restoration would restore graded road and pads by creating chaparral vegetation associations that are compatible with adjacent habitat without irrigation. In addition, there would be smaller areas of CSB habitat established on south-facing slopes that are compatible with existing vegetation distribution within the area. Off-site mitigation at the Tuna/Las Flores Canyon site would knit together existing chaparral habitat to enhance habitat continuity, reduce non-native vegetation within the disturbed site, and stabilize soils to reduce erosion. Finally, wetland/riparian habitat and native woodlands vegetation complex would be restored at Ramirez Canyon Park and King Gillette Ranch. At King Gillette Ranch, wetland/riparian habitat would be created along an existing creek through grading to widen the creek at an existing sharp bend. Self-sustaining southern willow scrub vegetation would be established along a selected adjacent existing creek section that does not presently support native wetlands habitat. Sycamore-Coast Live Oak woodlands would be established in a grove distribution adjacent to the creek restoration and enhancement areas. The intent of this arrangement is to create a complex of mutually supportive vegetation communities that result in long-term vegetation stability within this mitigation site with connections to adjacent oak woodlands.

The Biological Concept Mitigation/Restoration Plan includes a 5-year maintenance and monitoring program for all mitigation sites to ensure successful implementation of the habitat mitigation program. Maintenance would consist of controlling weeds and other pests, irrigation system operation and repairs and/or hand watering (if used), trash removal, erosion control, access control, remedial planting and seeding, etc. Adaptive management would be implemented in the event of unforeseen or unpredictable circumstances and would include the utilization of regular qualitative assessments and rapid quantitative assessment data gathered in the field prior to and during the mitigation effort to assess the health and vigor of vegetation communities within the mitigation areas.

The Mitigation/Restoration Plan has been reviewed by Commission Staff Ecologist, Dr. Jonna Engel, and she has determined that the sites are suitable for implementing the intended mitigation acreage and target habitat types and that all of the elements of the

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plan were appropriate to ensure success. To ensure that the Biological Concept Mitigation/Restoration Plan is included in the PWP, **Suggested Modification 50** requires that it be included as Appendix B of the Plan. Further, **Suggested Modification 22** specifies that as part of a NOID for a project included in the PWP, that the required final restoration/mitigation plan be consistent with the Biological Concept Mitigation/Restoration Plan.

Additional mitigation measures required for the proposed Plan include measures that address potential short- and long-term impacts to sensitive vegetation communities, special-status plant and wildlife species, and wildlife corridors. These include, but are not limited to, implementing detailed habitat restoration plans subject to specific mitigation objectives and performance standards, timing restrictions on construction activities, pre-construction field surveys and construction monitoring, where applicable, habitat restoration monitoring and reporting to appropriate regulatory agencies, imposing habitat setback requirements for new development, implementation of BMPs, minor modification of site design (trail alignments) to avoid impacts to special-status plants, as necessary, requirements for lighting and noise restrictions and facility maintenance, and installation of signs and fencing where determined necessary and appropriate to protect ESHA and/or special status species. These site design requirements and mitigation measures will serve to avoid and minimize impacts to ESHA, and to fully mitigate all impacts to ESHA, pursuant to the requirements of the Coastal Act and Malibu LCP.

Plan improvements have been sited and designed to minimize the need for grading and vegetation removal to the maximum extent feasible. Trail alignments are sited to utilize existing trail corridors and to avoid steep, vegetated terrain wherever possible and new support facilities would be sited and designed in relatively level areas void of vegetation, or containing disturbed vegetation, to minimize grading, landform alteration, drainage pattern disturbance, and vegetation clearance, to prevent soil erosion, sedimentation, and alteration of natural water flows. The proposed improvements demonstrate that new development would be take advantage of the most feasible development locations on the most level portions of the park properties to minimize grading that would otherwise be necessary to create camp pads and/or parking and restroom locations. In addition, the site designs utilize existing access roads wherever feasible to minimize the amount of grading necessary to provide for new parking or to assist accessibility to new camp improvements. The park improvement designs conform to the natural terrain of the Plan area to the maximum extent feasible and would result in minimal alteration of the existing topography.

Consistent with Malibu LUP Policies 3.47, 3.48 and 3.50, the Plan requires development and implementation of an Interim Erosion Control Plan for construction activities resulting in soil disturbance and vegetation removal to include the following standards: 1) the plan shall delineate the areas to be disturbed by grading or construction activities and shall include any temporary access roads, staging areas and stockpile areas, and natural areas on the site shall be clearly delineated on the project site with fencing or survey flags; and 2) should grading take place during the rainy season (November 1 –

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March 31) temporary sediment basins (including debris basins, desilting basins or silt traps), temporary drains and swales, sand bag barriers, silt fencing, geofabric covers or other appropriate cover, geotextiles or mats shall be installed on all cut or fill slopes as soon as possible. These erosion measures are required to be implemented on site prior to or concurrent with initial grading operations and must be maintained throughout the development process to minimize erosion and sediment from runoff waters during construction. In addition, Water Quality implementation measures require all graded and disturbed areas on the subject site to be planted and maintained for erosion control purposes within (60) days of completing construction activities resulting in soil disturbance or vegetation removal.

The proposed Plan includes several measures to ensure that public park areas subject to degradation resulting from intense and/or unrestricted use are addressed and fully mitigated. These measures include: 1) revegetation of degraded areas with native plants, 2) trail consolidation and improvement, 3) provision of support facilities such as defined parking areas and trail corridors, trash and recycling receptacles, self-contained restrooms, picnic areas, and 4) provision of support facilities necessary for operations and maintenance personnel and associated maintenance equipment. The Plan includes a comprehensive Coastal Campgrounds and Trails Maintenance Plan for proposed trail and park improvements, and the existing structures of Ramirez Canyon Park have and will continue to provide a center within the Plan area for maintenance personnel and associated equipment storage necessary to sustain maintenance operations for the subject park areas. The Plan's support facilities will ensure that adequate facilities are provided and maintained to manage public parking, trailhead, day-use and camp areas, and to accommodate potential trash and waste generation at park areas. These measures will ensure that public use of the parklands is maximized in a way that maintains park areas and sensitive resources such that they remain desirable destination areas for visitors.

The proposed Plan allows limited use of herbicides where necessary and appropriate in campgrounds to protect, maintain or enhance surrounding habitat areas. No herbicides would be used for vegetation management on trails. In addition, the proposed Coastal Campgrounds and Trails Maintenance Plan includes preparing and maintaining a pesticide database to record all instances of deployment of weed control herbicides and other pesticide used for facility maintenance. The Plan does not involve use of any toxic chemical substance that would adversely impact ESHA. Therefore, the Plan is consistent with City LUP Policy 3.18.

Consistent with LCP Policy 3.22, the Plan includes signs for park development projects at existing facilities where determined appropriate for the purpose of identifying sensitive habitats and educating visitors of ESHA occurrence and/or restoration efforts. In addition, the Plan includes development of a uniform and comprehensive sign program, which will be posted in English and in Spanish, where applicable, to assist the public in identifying public parks, and locating and recognizing trail access points, public support facilities, sensitive habitats, potential natural hazards, and park rules.

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Other than Ramirez Canyon Park, there is currently no lighting at the park properties. Existing lighting at Ramirez Canyon Park is provided for safety purposes and consists primarily of lighting around buildings, lighting along the road in the Park, and lighting at foot-level along walkways. The proposed Plan includes additional, temporary lighting at Ramirez Canyon Park that would be limited to special event uses, and additional interior lighting at the other park properties that would be associated with camp host locations. Lighting would continue to be limited throughout the Plan, area and the PWP includes implementation measures that specify that any approved lighting must comply with standards for shielded low sodium, low wattage lighting designed to cut glare and light scatter and to direct light away from sensitive biological resources.

Through past permit actions in the Santa Monica Mountains, the Commission has found that native trees are an important coastal resource, especially where they are part of a larger woodland or other habitat area that is ESHA. The Malibu LCP recognizes the importance of native oak, walnut, sycamore, alder and toyon trees in preventing the erosion of hillsides and stream banks, moderating water temperatures in streams through shading, contributing nutrients to streams, supporting a wide variety of wildlife species through the provision of food, nesting, and roosting cover, and contributing to the scenic quality of the community. Native tree impacts associated with the proposed Plan have been minimized to the maximum extent feasible and the PWP includes several implementation measures, consistent with the Malibu LCP, regarding the protection of native trees within the Plan area and requirements for mitigation should impacts be unavoidable.

In addition, given the large number of native trees within the Plan area and potential impacts by encroachment, the Commission finds that it is important in this case to establish a methodology for discerning major and minor encroachments and appropriate corresponding mitigation and/or monitoring. To supplement the typical mitigation ratio requirement of 10:1 for native tree removal or significant damage that is included in the Malibu LCP, the SMMC/MRCA have suggested the following encroachment thresholds and corresponding mitigation requirements to be implemented Plan-wide.

- 10:1 mitigation for encroachments that occupy an area greater than 30% of the protected zone.
- 10:1 mitigation for encroachments that extend within 3 ft. of the tree trunk.
- 10:1 mitigation for the removal of a tree branch that exceeds 11-in. in diameter.
- 5:1 mitigation for encroachments that occupy 10-30% of the protected zone.
- Monitoring (10 yr) of the health of native trees for encroachments that occupy less than 10% of the protected zone.

Commission staff ecologist, Dr. Jonna Engel, has reviewed this proposal and determined that the encroachment thresholds are appropriate and sensible, and the mitigation requirements are generous in providing mitigation for the impacts to native trees in the Plan area. As such, the Commission finds this strategy more specific, rigorous, and protective of trees than is required by the Malibu LCP or what the

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Commission typically requires in the Santa Monica Mountains of unincorporated Los Angeles County. **Suggested Modification 26** has been included to ensure this special native tree mitigation program is incorporated into the PWP as an implementation measure (ESHA Implementation Measure 23). In addition, to replace a misplaced implementation measure in the native tree subsection of the PWP (that was incorporated into another measure pursuant to Suggested Modification 22) with an implementation measure regarding preparation and implementation of a Native Tree Replacement Planting Program pursuant to Measure 23 above, **Suggested Modification 27** is required. Further, **Suggested Modification 28** to the native tree monitoring implementation measure of the PWP (ESHA Implementation Measure 25) is required to make a minor change in order to clarify the native tree monitoring process and incorporate the threshold for minor encroachments requiring monitoring only pursuant to Measure 23 above. Lastly, there is an implementation measure in the native tree subsection of the PWP that is regarding project review requirements of future development not described in the Plan that may impact ESHA. This measure is beyond the scope of the PWP and is not appropriate for inclusion in the Plan. As such, **Suggested Modification 29** is required to delete ESHA Implementation Measure 31 of the plan.

Additional mitigation measures to protect native trees include protective fencing around the outermost limits of the protected zones of the native trees within or adjacent to the construction area that may be disturbed during construction, use of hand-held tools or other methods that avoid damage to tree roots such as air spade excavation for grading or excavation that encroaches into the protected zone of a native tree, specific methods for necessary root and/or crown pruning, and arborist monitoring for soil disturbing activities occurring directly under tree crowns, including demolition, excavation, and installation. As such, the proposed site design and mitigation measures included in the Plan will serve to avoid and minimize impacts to native trees resulting from the proposed trail and park improvements, and to fully mitigate unavoidable impacts, consistent with the Coastal Act and Malibu LCP.

The riparian corridors in the Plan area provide important habitat for a variety of sensitive plant and animal species. The value and quality of the sensitive habitat areas within these parks are directly related to the water quality of the coastal tributary that sustains them. Therefore, to ensure protection of ESHA and to minimize impacts to water quality, the proposed Plan improvements have been located and designed to minimize soil disturbance, removal of natural vegetation and landform alteration. In addition, to ensure protection of water resources, the park-specific project plans include site designs that are consistent with the Coastal Act and Malibu LCP requirements with respect to protection of all sensitive resources and minimum setback/buffer requirements from all coastal waterways.

According to the Penfield & Smith preliminary drainage analysis, Plan implementation would not substantially alter the existing drainage pattern of proposed improvement areas, nor would Plan implementation substantially increase the rate or amount of

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surface runoff. Consistent with the water quality protection policies of the Coastal Act and Malibu LCP, the Plan includes a number of sensitive site design measures and project features to address potential impacts of grading, drainage, stormwater runoff and water quality associated with the proposed improvements. Trail construction would be designed consistent with the Park and Trail Accessibility Design Guidelines document prepared by Moore Iacofano Goltsman, Inc. for the Plan area. These guidelines provide specific trail design measures to ensure resource protection through appropriate drainage and control measures, and adherence to current design practices for mountain trail design including addressing drainage, erosion control and dissipation.

Proposed park facility improvement areas are located and designed to utilize existing access points and roads wherever feasible to minimize the amount of grading necessary to provide for new parking and/or to assist accessibility to new camp improvements. The park improvement designs conform to the natural terrain of the Plan area to the maximum extent feasible and would result in minimal alteration of the existing topography. Above-ground vegetated methods to collect and treat stormwater runoff for post-project conditions have been incorporated into plan improvements, which include passing unconcentrated flows over natural vegetation, vegetated filter strips or through bio-swales. Where necessary, rock rip-rap energy dissipaters have been incorporated into specific project features to collect stormwater runoff and to minimize erosion and scour at discharge points. Parking areas may be improved with asphalt concrete; however, according to the Penfield & Smith preliminary drainage analysis (Penfield & Smith) the amount of runoff would be minimal from these facilities. Additional permeable materials in parking lot areas would be utilized where feasible and consistent with site-specific geotechnical recommendations. To ensure that permeable materials for surfacing are utilized wherever feasible in the Plan area, **Suggested Modification 30** is necessary to add this requirement to Water Quality Implementation Measure 1 of the PWP. Bioswales have been designed for parking areas, and parking areas would be contoured to direct all potential flow from impervious areas to pervious areas of the sites. Campsite areas throughout the Plan area would be surrounded by a vegetated buffer and gently graded such that any runoff would be directed to adjacent vegetation.

Additional water treatment components of the Plan include gravel or rock-filled drainage sumps provided for potable water spigots. At proposed camp areas, restrooms would be equipped with gravel filled drainage sumps to capture and treat any runoff associated with maintenance and cleaning activities, and camping areas would be provided with small gravel drainage sumps to capture and treat any water discharge from water faucets. Infiltration best management practices such as bioretention and permeable surface materials (including decomposed granite) have been incorporated into the project design, or will be implemented during final design, where feasible. As such, the Plan will not result in the degradation of the water quality of groundwater basins or coastal surface waters and all improvements are designed to minimize, to the maximum extent feasible, the introduction of pollutants of concern that may result in significant impacts from site runoff from impervious areas.

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To preserve water quality and protect sensitive habitats, discharge of harmful substances into or alongside coastal streams or wetlands are prohibited pursuant to park regulations. No development-related water discharge to coastal waters would result from implementation of the Plan improvements and, as described above, the Plan provides for improvements to retain and treat stormwater runoff. The Plan improvements will minimize stormwater runoff and interference with surface water flow, will treat all stormwater runoff and maintain natural vegetation buffer areas that protect riparian habitats, and thus will not result in discharge to coastal waters that would adversely affect water quality. Therefore, the Plan is consistent with Coastal Act Sections 30230, 30231 and 30232, and related water quality protection policies of the Malibu LCP and Los Angeles County LUP (used as guidance).

The Plan does not involve installation of any new on-site treatment systems. The proposed Plan provides that all new public restroom facilities consist of self-contained restrooms (except at Ramirez Canyon Park where new restrooms would be connected to the existing onsite wastewater treatment system) that are sited and designed to ensure that impacts to ESHA and water quality are avoided. Project plans demonstrate that, except where the Malibu LCP specifically allows for a reduced stream setback, new restroom facilities would be located 200 feet from the top of bank of any adjacent stream, or outer edge of the riparian canopy, whichever is greater, wherever feasible, and in no case less than 100 feet from the top of bank of any adjacent stream, or outer edge of the riparian canopy, whichever is greater.

With respect to existing septic and sewer treatment systems at Ramirez Canyon Park, portions of the systems are located within the 50-year burned-and-bulked/ 100-year flood zone. Septic holding tanks, however, are air- and water-tight and, in the event of a flood event, the lids of these tanks are bolted shut, which ensures that there would be no leakage, such that adverse water quality impacts would be avoided. Nonetheless, the Plan provides for a Water Quality Monitoring Program to be implemented at Ramirez Canyon Park including provisions for quarterly analysis of water samples up- and down-stream of the subject site for a minimum of four quarters of available streamflow, commencing with implementation of the proposed Plan.

The Plan requires that the previously implemented advanced wastewater treatment and recycled water system be maintained onsite at Ramirez Canyon Park and that new permanent restroom facilities at the Park be connected to the system. This system is to be used for all visitors, tours, gatherings and events at Ramirez Canyon Park accommodating up to 200 people (the design capacity of the existing wastewater treatment system). The Plan provides that, should any use, or combination of uses, at Ramirez Canyon Park result in a capacity of visitors exceeding 200 people at any one time, temporary, portable restrooms are to be provided to supplement the treatment capacity of the wastewater treatment system. Therefore, the proposed Plan will not result in any new wastewater discharge within the Plan area.

Conclusion

In conclusion, the Commission finds that proposed improvements included in the Plan (with the exception of emergency fire shelters) have been appropriately located, to the extent feasible, in previously disturbed areas, and are appropriately setback from the top of bank of any adjacent stream, or outer edge of the riparian canopy, whichever is greater. Impacts to ESHA are limited to resource dependent uses. Where it is not feasible to avoid impacts to ESHA, proposed improvements have been designed to minimize impacts to ESHA. New development has been sited to minimize grading, removal of native vegetation, and impacts to native trees. The proposed PWP contains sufficient measures that ensure that the potential impacts of future development to ESHA and water quality are avoided or minimized to the maximum extent feasible. The Commission finds that the PWP, if modified as suggested, will ensure that environmentally sensitive habitat areas will be protected against disruption of habitat values, that only uses dependent on the resource will be allowed within ESHA, and that proposed development adjacent to ESHA will be designed to prevent adverse impacts to ESHA and be compatible with its continuance. Additionally, the Commission finds that the PWP, if modified as suggested, will ensure that new development will maintain, and restore where feasible, the biological productivity of coastal waters by controlling runoff, maintaining vegetation buffers that protect riparian habitat, and minimizing alteration of streams. As such, the Commission finds that the proposed Plan, if modified as suggested, is consistent with the Malibu LCP policies and provisions cited regarding the protection of ESHA, water quality, and native trees for the portions of the plan within the City of Malibu. Further, the Commission finds that the portion of the proposed Plan located in unincorporated areas, if modified as suggested, is consistent with Coastal Act policies cited, and the guidance provided by the cited policies of the Los Angeles County LUP regarding the protection of ESHA, water quality, and native trees.

4. New Development

a. Relevant Policies

Both the Coastal Act and Malibu's certified LCP contain policies that regulate new development in the Coastal Zone. Due to the length of relevant policy language, the following relevant policies are attached as Exhibit 10 of this staff report.

Coastal Act § 30250 and 30252.

Los Angeles County LUP Policies: P24, P25, P33, and P37.

Malibu LCP Policies: 2.7, 2.8, 5.68, 5.71, and LIP Section 3.4.2.D.

b. Analysis

Section 30250 of the Coastal Act requires that new development be located in, contiguous with, or in close proximity to, existing developed areas able to accommodate it, or, if necessary, in other areas with adequate public services, and that visitor-serving

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facilities that cannot be located in existing developed areas be located in existing isolated developments or at selected points of attraction for visitors. Section 30252 of the Coastal Act requires that new development maintain and enhance public access to the coast with, among other means, transit service, providing non-automobile circulation within development, providing parking facilities, and by assuring that the recreational needs of new residents will not overload nearby coastal recreational areas by correlating the amount of development with local park acquisition and development plans with the provisions of onsite recreational facilities to serve new development. City of Malibu LCP and County LUP policies also require that adequate parking be provided to maintain and enhance public access, and that recreational facilities be located and distributed to prevent overcrowding and to protect environmentally sensitive resources. The Malibu LCP also contains specific measures and development standards to implement transit improvements and shuttle programs for the Plan area, and for the development of support facilities including parking at trailheads and park staging areas.

The proposed Plan includes development of recreational facilities and uses at park properties that are located contiguous with developed areas with adequate public services to serve the proposed improvements and uses. All of the recreational facility improvement areas are located adjacent to roads where infrastructure already exists to serve surrounding, developed areas. In some cases, proposed trail improvements would be located in more remote areas, however, the passive recreational use of the proposed trail corridors does not require substantial public services, and these trail corridors have been appropriately located and designed to take advantage of the unique qualities of the open space and natural resources of Malibu and Santa Monica Mountains area. The Plan includes park improvements and uses that would be accessible to backpackers hiking along the proposed Coastal Slope Trail, bicyclists traversing along Pacific Coast Highway, and riders of the public bus system (Metropolitan Transportation Authority, MTA). The proposed camping program is designed to be transit accessible, so that visitors can utilize the MTA bus service to backpack from the camp areas at Malibu Bluffs and Corral Canyon Park to travel further west to the Latigo Trailhead property, Escondido Canyon Park and Ramirez Canyon Park via the Coastal Slope Trail. To further maximize public access in the Plan area, the Plan includes measures for the SMMC/MRCA to coordinate with the MTA to include a stop in the existing service route to the Winding Way Trailhead parking lot along the primary transportation corridor (Pacific Coast Highway), and to provide service information to the public via public notices, trailhead signs and website posting.

The Plan also includes new public parking resources at existing parklands to alleviate parking demand for public use and recreation where current parking restrictions on adjacent roadways limit public access opportunities. Public parking improvements are proposed along Kanan Dume Road (to support trail access to Ramirez Canyon Park), near the entrance in Ramirez Canyon Park (improvement to existing parking lot), at the Latigo Trailhead property, Corral Canyon Park (improvement to existing parking lot), and Malibu Bluffs. The Plan includes bike racks at new parking facilities, which will serve to facilitate alternative means of transportation to and between park areas. In

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addition, the proposed Plan will provide an alternative method of accessing park areas by providing pedestrian connections between parklands, further supported by development of new facilities intended to accommodate and encourage biking. Finally, the Plan includes use of shuttles and van pools, and development of new hike-in opportunities, to facilitate public use of Ramirez Canyon Park where public access opportunities to the park are presently limited.

Consistent with the Coastal Act and Malibu LCP, all proposed Plan locations have been evaluated by a qualified biologist to ensure that park improvements have been appropriately located, to the extent feasible, in previously disturbed areas, and are appropriately setback from the top of bank of any adjacent stream, or outer edge of the riparian canopy, whichever is greater. All proposed park improvement locations and uses have been evaluated for potential impacts to habitat areas and mitigation measures identified to ensure resource impacts are avoided and minimized to the maximum extent feasible.

Malibu LCP and County LUP policies establish the types of land uses that are permitted within the Plan area. The majority of the Plan area is located within the City of Malibu and, with the exception of the Latigo Trailhead property and many of the proposed trail corridors, all of the proposed park improvements and uses would be located on lands that are zoned Public Open Space (POS). Proposed improvements within unincorporated Los Angeles County consist of two small parking areas proposed at Kanan Dume Road (with a Parks land use designation), the northern day use area, restroom, and a portion of the proposed creek restoration within Ramirez Canyon Park (with a Rural land/Mountain land use designation that allows for recreational uses), and various trail corridors in Ramirez Canyon and Corral Canyon areas. Proposed trail corridors are located on lands in the City and County that are subject to various land use designations.

City LUP Policy 2.7 provides that trails and parklands are permitted uses in all land use zoning designations and that related support facilities shall be permitted to be constructed, opened and operated for its intended public use. The City's LCP further specifies that passive recreation, research and education, nature observation, and recreational and support facilities are permitted uses in the POS land use designation. LCP Policy 5.71 further provides that trails, camp facilities, public outreach and educational programs and/or related support facilities (e.g. parking, public restrooms, picnic amenities, ranger/ maintenance supervisor housing, nature centers, administrative personnel facilities related to the daily operation and maintenance of parklands and park programs), and special programs and events conducted at Ramirez Canyon Park, are permitted uses in the Malibu Parks Public Access Enhancement Plan Overlay and shall be permitted to be constructed, opened and operated for intended public use or benefit where it is determined feasible to locate, design, and maintain such facilities and uses so as to avoid, or minimize and fully mitigate, potential impacts.

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Consistent with the POS land use designation of the City LCP, the Plan includes trail and park improvements dedicated to public access, recreation, education and the preservation of natural resources, including hiking trails, camping, recreational support facilities, and special public outreach programs, all designed to maximize public access, recreational and education opportunities within the Plan area consistent with the intent of the POS land use designation and the uses specifically allowed in the POS Zone. Existing and proposed support facilities included in the Plan are those facilities deemed necessary to support the principal permitted land use, in this case public access, recreation, education and preservation. The type of uses and support facilities addressed at each park facility is based on the natural constraints of each park property, existing available access, and the level and complexity of public uses and specialized programs offered at each park area. Ramirez Canyon Park, given its unique character, limited accessibility to the general public, and specialized programs uses, requires more administrative and support facilities to maintain access programs, daily operations and maintenance requirements than do Escondido or Corral Canyon Parks, and Malibu Bluffs that provide primarily passive recreation. Additionally, the developed nature of Ramirez Canyon Park provides facilities from which the Conservancy and MRCA can conduct the administrative responsibilities associated with operating specialized public outreach programs, conducting open space acquisitions, planning, research, and the management of conservation of parklands in the coastal zone. These uses are typically associated with publicly-owned parklands and are consistent with the type of uses permitted in other open space and recreation designated lands in the coastal zone as evidenced by the numerous parklands that support similar critical administrative functions as well as important public access programs.

Ramirez Canyon Park contains a number of unique support facilities which are not readily or widely available at many parks in the Plan area. Therefore, the park has the established facilities to provide a range of diverse passive and active recreational uses of the property. The more developed nature of the park lends itself well to function as a place for special, pre-arranged activities, events, and functions typically permitted by the State Parks system for the benefit of the community and visitors. Additionally, the park has facilities to provide indoor and outdoor conference and event amenities. Finally, the developed nature of this park allows for more accessibility than in other more remote or hillside locations.

While the Latigo property is designated and zoned residential, the Plan includes park and recreation improvements for parklands owned by the Conservancy/MRCA, which according to Malibu LCP Policy 2.7, are permitted uses in all land use and zoning designations. In addition, all improvements and uses permitted pursuant to Malibu LCP Policy 5.71 (trails, camp facilities, public outreach and educational programs and/or related support facilities) are allowable uses irrespective of its residential land use designation and zoning.

Malibu LCP and County LUP policies require that park uses be consistent with the visitor carrying capacity of parklands, where availability of support facilities, accessibility, protection of natural resources, public safety issues, and neighborhood compatibility

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may be limiting factor on visitor carrying capacity. County LUP policies further require that public recreation facilities protect the health and safety of trail users as well as adjacent residents, and minimize impacts on neighboring communities, to the extent feasible, from noise, visual and traffic impacts from new recreation areas. To address issues of potential land use conflicts and neighborhood compatibility, the Plan includes detailed measures addressing trail location and design, signage requirements, and strict limitations and restrictions on park uses, including administrative uses, public programs and events for Ramirez Canyon Park.

The Plan meets the public need for public access and recreation while also complying with the mandate to minimize impacts to coastal resources and ensure land use compatibility. The proposed park improvements and uses have been based on land use and resource constraints at each park property, and in consideration of park-specific land use compatibility concerns. To minimize potential land use conflicts with adjacent residential neighborhoods, proposed trail and park improvements have been located and designed to provide separation between public trails and use areas and private property where feasible by including measures such as signs and fencing which delineate trail corridors, park boundaries, permitted parking areas, and private property, and restricts activities which may result in nuisance noise, odors, or other uses that may impact the quality of life in residential areas. The Plan includes a number of implementation measures that ensure short-term (construction) and long-term (operational) impacts associated with noise, air quality and lighting will not substantially affect adjacent residential areas.

The Plan includes comprehensive Coastal Campgrounds and Trails Maintenance Plans for the proposed park and trail facility improvements which details ranger services, patrols and enforcement. Implementation of these plans will ensure enforcement of park rules and regulations, including but not limited to no fires, no smoking, no littering, no trail cutting, and general monitoring of park activities to ensure recreation uses do result in substantial land use conflicts with surrounding properties.

The Plan proposes to implement a number of trail segments identified in the Santa Monica Mountains National Recreation Area Interagency Trail Management Plan (TMP), City of Malibu Local Coastal Program Trail Map, and the City of Malibu Trail Master Plan. However, where there is presently insufficient access opportunities via public easements (existing or proposed) and/or where there may be potential conflicts with adjacent neighborhoods or steep terrain that may be avoided, alternative trail alignments have been evaluated and incorporated into the Plan to ensure trail implementation, connectivity, and to reduce potential land use conflicts and resource impacts. The Plan's trail system utilizes alternative trail alignments on public land, within existing public trail easements, and within potential future public land purchases or easement dedications wherever feasible to avoid potential conflicts with private property and adjacent neighborhoods. The Plan's sign program will provide information on regulations required to promote safe use of the area and resource protection, where appropriate signs and visual cues will also serve to clearly identify the designated public

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parking areas and public trails throughout the Plan area to avoid conflicts with private property and sensitive habitat areas.

Ramirez Canyon Park

The Plan also includes detailed measures addressing administrative uses, public programs and events for Ramirez Canyon Park, and strict limitations and restrictions associated with the uses, intended to ensure compatibility with adjacent residential development in Ramirez Canyon. The proposed use restrictions and limitations included in the Plan mirror those certified by the Commission in the Malibu Parks Public Access Enhancement - Malibu LCP Amendment (LCPA 1-08), except that the PWP proposes the uses in two phases and reduces the maximum number of special events at Ramirez Canyon Park that was allowed under the Malibu LCP from 32 events per year to 16 events per year.

With certification of the Malibu LCP, the land use and zoning on the property is open space (City jurisdiction), as well as rural/mountain land (County jurisdiction), which permit recreational uses, and is deemed a compatible land use adjacent to residential uses. However, given the park's location at the top of the canyon above adjacent residential uses, there is the potential for traffic and noise to affect adjacent residences. As part of the Malibu LCP Amendment (LCPA 1-08) regarding the Malibu Parks Public Access Enhancement Plan Overlay, the Commission certified restrictions on the number of shuttle van trips for public outreach and education activities, special events and amplified music restrictions at Ramirez Canyon Park that were found to be in conformity with the certified Malibu LUP and the program restrictions that the Commission had previously found necessary to ensure consistency with the policies of the Coastal Act (CDP 4-98-334). The Commission restricted these activities in the Malibu LCP to ensure the Ramirez Canyon Park activities and programs would be compatible with the surrounding character of the community.

The primary buildings at Ramirez Canyon Park have all been used as recreational facilities and as a location to conduct or manage recreation uses at the Park. The offices at Ramirez Canyon Park are also used to conduct the administrative responsibilities associated with open space acquisitions, planning, research, the management of conservation and recreation activities at Conservancy holdings, and support for on-site park maintenance and public outreach programs. The proposed PWP consists of implementing uses and improvements at Ramirez Canyon Park in two phases. Phase 1 continues existing administrative and small program event uses at the park with only minor new improvements, including retrofit of the Ranger/Maintenance Supervisor Residence as a fire shelter, and passive recreation-related improvements. Consistent with the Malibu LCP, all Ramirez Canyon Park uses, including administrative and operational uses, public outreach, events, gatherings, tours, and workshops, etc. shall be limited in size, duration and occurrence to comply with the proposed maximum of 40 round trips/day on Ramirez Canyon Road. Public outreach and education activities are priority uses and shall be accommodated first within the maximum allowed

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40 round trips/day for Ramirez Canyon Park uses. Use of the Peach House and Barn facility for small group gatherings and tours for up to 40 participants each, and to a limited extent the Art Deco facility may be used to greet guests or as a component of site tours, but not as a primary site for group functions. The PWP allows for continuation of existing small events (e.g., public outreach, meetings, etc.) that would be allowed year-round, permitted 2 days/week, with a maximum 40 participants (with an additional 20 staff on-site). Conservancy/ MRCA employee training and workshops would be allowed year-round, permitted twice per month, with maximum 60 persons on-site. In addition, a Transportation and Parking Management Plan would be implemented to manage traffic trips on Ramirez Canyon Road.

Phase 2 would implement a full complement to Phase 1 specialized programs and uses, which are intended to further facilitate unique access opportunities for visitors with disabilities as well as providing a variety of recreational and educational opportunities for persons of all ability levels, while continuing to provide for essential administrative support facilities. Phase 2 includes all of the Phase 1 programs and uses and also includes structural retrofits to the Peach House to be used as a fire shelter, two new accessible campsites, new parking improvements, new improved accessible day use areas, new restrooms, as well as large special events (sixteen (16) 200-person events per year). If required by the responsible fire agency, road improvements to Via Acero Road for secondary emergency access would be associated with the implementation of Phase 2 improvements. Special events (gatherings of participants/ guests numbering more than 40) would be limited to the following:

- March – October, 16 Events Permitted/Year, 1 Event Permitted/Week
- Maximum 200 Participants (April 1 through July 31) (with additional 50 staff and employees of service providers)
- Maximum 150 Participants (March 1 through March 31 and August 1 through October 31) (with additional 50 staff and employees of service providers)
- 8:00 AM – 9:00 PM Sunday-Thursday, and 8:00 AM to 10:00 PM Friday and Saturday, One Additional Hour is Allotted for Personnel Clean-Up and Securing the Facility.

Consistent with the Malibu LCP, the PWP specifies that amplified music would only be provided in the areas located immediately in front of and behind the Barn facility and at no time shall amplified music be audible beyond the property boundaries adjacent to residential development. In addition, event monitors on duty during such events shall check sound levels hourly at the site boundaries nearest adjacent residential development and shall immediately ensure volume reduction to achieve this standard should it be exceeded. Amplified music shall not be allowed anywhere on the subject site after 8:00 p.m. Sunday through Thursday evenings or after 10:00 p.m. on Friday or Saturday evenings. Special event sponsors shall be provided written notice of these amplified music restrictions prior to entering into a contract for rental of the facility. In

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addition, the PWP requires that exterior lighting associated with special events shall be minimized and restricted to low intensity fixtures, shielded, and concealed to the maximum extent feasible so that no light source is directly visible from public viewing areas.

With these use limitations and transportation restrictions proposed in the PWP, consistent with the Malibu LCP, potential impacts on adjacent neighbors and potential conflicts between park users and private residences are minimized. The Plan's implementation measures would serve to minimize potential traffic, noise, and lighting impacts to Ramirez Canyon neighbors.

Land Use Implementation Measure 16 in the PWP lays out the use restrictions for Ramirez Canyon Park in a general way and does not specify the proposed phasing of uses and improvements that is discussed in the Scope of Improvements subsection of the PWP. As such, **Suggested Modification 37** is required to reflect the proposed phasing of Ramirez Canyon Park uses and improvements as an implementation measure. In addition, as discussed previously, CDP 4-98-334 that had authorized various administrative uses, programs, and events at Ramirez Canyon Park is no longer valid. Therefore, the existing uses that are proposed to continue as part of Phase 1 of the Plan are not technically permitted and would require a NOID upon certification of the PWP. Similarly, the historic, unpermitted creek impacts must be resolved through a NOID after PWP certification. Therefore, as part of Land Use Implementation Measure 16 regarding Ramirez Canyon Park, **Suggested Modification 37** includes a provision regarding timely resolution of unpermitted Phase 1 uses and historic, unpermitted impacts to Ramirez Creek. Suggested Modification 37 requires that within 180 days of final PWP certification, a NOID shall be submitted for unpermitted Phase 1 Ramirez Canyon Park uses and for historic, unpermitted impacts to Ramirez Creek riparian habitat, consisting of preparation of a detailed Final Ramirez Creek Restoration Plan that may be implemented in phases, but at a minimum, stream bank restoration of lower Ramirez Creek as shown on Sheet 55 of Appendix A must be installed within one (1) year of the NOID approval, and the remainder of the proposed Ramirez Creek restoration and associated mitigation must be installed within five (5) years of the NOID approval. The Commission finds this suggested modification is necessary to ensure that Ramirez Canyon Park uses and improvements are phased as proposed and unpermitted aspects of the uses and improvements are resolved in a timely manner through NOIDs.

Conclusion

The Commission finds that the proposed Plan, if modified as suggested, is consistent with the Malibu LCP policies and provisions cited regarding new development for the portions of the plan within the City of Malibu. Further, the Commission finds that the portion of the proposed Plan located in unincorporated areas, if modified as suggested, is consistent with Coastal Act policies cited, and the guidance provided by the cited policies of the Los Angeles County LUP regarding new development.

5. Visual Resources

a. Relevant Policies

The Coastal Act, Los Angeles County Malibu-Santa Monica Mountains Land Use Plan, and the City of Malibu certified LCP contain policies regarding the preservation of scenic and visual resources. Due to the length of relevant policy language, the following relevant policies are attached as Exhibit 11 of this staff report.

Coastal Act § 30251

Los Angeles County LUP Policies P16, P91, P125, P126, P127, P129, P130, P131, P134, and P142.

Malibu LCP Policies 6.1, 6.2, 6.3, 6.5, 6.6, 6.8, 6.9, 6.10, 6.11, 6.12, 6.13, 6.14, 6.14, 6.16, 6.17, 6.18, 6.20, 6.23, 6.27, 6.28, 6.30, 6.31, LIP Section 3.4.2.D, and LIP Section 6.8.

b. Analysis

Section 30251 of the Coastal Act requires scenic and visual qualities to be considered and preserved. The Malibu LCP requires that all new public access and recreation improvements be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas.

The proposed Plan appropriately addresses the entire Plan area as a significant scenic area providing views to and along the coastline and the naturally vegetated open space areas of the Santa Monica Mountains. Proposed improvements will potentially be visible from Kanan Dume Road, Latigo Canyon Road, Corral Canyon Road and Pacific Coast Highway, which are designated scenic roads pursuant to Malibu LCP Policy 6.3. However, due to the secluded nature of the proposed improvement areas, variations in natural topography and existing vegetation that will be retained on the sites, the planned improvements and necessary grading will not be highly visible from the majority of viewsheds within the Plan area. The Plan includes development of low-impact camp sites, restroom facilities, camp host/ranger residence sites, fire truck sheds (at Corral Canyon Park and Malibu Bluffs only), water tanks, trails, and parking/trailhead facilities. Consistent with the Coastal Act and Malibu LCP, these proposed improvements at each park area have been sited in level areas to minimize grading and landform alteration, and within areas where existing vegetation and the natural topography minimize visibility of the improvement locations from scenic roads. Where necessary, planting efforts utilizing native vegetation is proposed to further screen new development from public views within park areas.

Proposed camp area improvements, including restrooms, are designed to be clustered in specific locations that are not highly visible from primary public viewing areas and that would not damage existing scenic resources. Additionally, camp facility improvements

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are sufficiently setback on the marine terrace at Corral Canyon Park and Malibu Bluffs to avoid or minimize visual impacts. Public access improvements, with the exception of the day-use area on the lower portion of the east bluff, at Malibu Bluffs are setback over 100 feet from the edge of the bluff to avoid visual impacts from Malibu Road and the beach below. In addition, the proposed improvements on the elevated terrace at Corral Canyon Park are also set back from the bluff edge and behind a local ridge to avoid view impacts from Pacific Coast Highway and the beach below. Furthermore, the Plan does not include or contemplate the addition of any structural improvements such as shoreline protective devices, drain pipes or discharge dissipaters on a bluff or beach.

The proposed Plan requires and incorporates design features to ensure compatibility of the proposed improvements with the surrounding landscape. These features include ensuring that all proposed walls and structures are designed with colors that are earth-toned, camouflaged, or otherwise compatible with the existing landscape, and adequately screened with native plants. Proposed landscape screening would consist of, where appropriate, Coast live oak, Sycamore, Sugarbush, Willow, Alder, Toyon, Lemonade berry, Coffeeberry, and/or Walnut. In particular, landscape screening would be used to screen views of parking lots at Malibu Bluffs from Pacific Coast Highway, where such plantings would not substantially block bluewater views across the site, and sugarbush would be planted between campsites to provide moderate shielding for campers, where appropriate. The Plan provides that retaining walls be allowed only where required to support critical trail linkages on hillside terrain and where no other alternative route or method for trail support is available, consistent with the Malibu LCP. The Plan also requires that retaining walls not exceed six feet; stepped or terraced retaining walls (up to twelve feet in height), with planting in between. All retaining walls would be designed with natural materials or would incorporate veneers, texturing and/or colors that blend with the surrounding earth materials or landscape. Drainage devices for parking facilities would be placed in locations of minimal visibility, would be colored to match natural soils, and would be screened with landscaping to minimize visibility.

The proposed Plan involves minor road improvements to provide access to Malibu Bluffs, all of which would be limited to directly adjacent to Pacific Coast Highway, and improvements to existing roads for emergency access purposes (Ramirez Canyon Road/Delaplane and Via Acero). These road improvements would not result in significant landform alteration or be substantially visible from any scenic public open space areas. The Plan improvements will require minor grading for new trails and park facilities. Due to the secluded nature of the proposed improvement areas, variations in natural topography and existing vegetation that will be retained on the site, the planned improvements and necessary grading will not be highly visible from the majority of viewsheds within the Plan area. However, the Plan requires that all graded and disturbed areas shall be planted and maintained for erosion control purposes within (60) days of completing construction activities resulting in soil disturbance or vegetation removal. To minimize the need for irrigation, implementation measures require that re-vegetation efforts consist of native plants from native genetic stock. Invasive, non-indigenous plant species are not permitted.

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Additionally, the proposed Plan requires that signs and fencing be located and designed to be subordinate to the natural park area setting and shall not substantially intrude into or obstruct public scenic viewing areas.

Malibu Bluffs

Pursuant to the Malibu LCP, park improvements are required to be designed to maintain existing bluewater views across the site. Portions of proposed improvements at Parking Area 3, Camping Area 3 and Camping Area 4 are below and setback a substantial distance from Pacific Coast Highway such that blue water views across the site would not be obstructed. In addition, the existing vegetated berm that extends along a majority of the Bluffs property fronting Pacific Coast Highway provides a natural screen from most viewpoints along Pacific Coast Highway.

Some proposed improvements would be visible from certain locations on Pacific Coast Highway. Portions of the proposed improvements at Parking and Camping Area 1 (fire truck storage shed, employee quarters and restroom, storage sheds, water tank), Camping Area 2 (restroom), and Parking Area 3 (restroom, water tank, parking lot) are visible from Pacific Coast Highway. However, the proposed improvements would not substantially obstruct existing public views, particularly blue water views, across the site from Pacific Coast Highway. However, to reduce potential impacts on blue water ocean views from Pacific Coast Highway, the PWP contains an implementation measure that requires Parking Area 3 at Malibu Bluffs to be constructed a minimum of 3-ft. below road grade of PCH. This design feature will have the effect of lowering the height of the proposed water tank and restroom structure at that location.

Portions of the proposed improvements at Parking and Camping Area 1 (fire truck storage shed, employee quarters and restroom, storage sheds, water tank), Camping Area 2, and Camping Area 3, and Camping Area 4 are visible from the City's Park to the east. However, the proposed improvements are setback mostly below and a substantial distance from the park, such that blue water views across the site would not be obstructed from the City's Park. In addition, although the proposed restroom facility adjacent to Malibu Road would be visible from Malibu Road, it would not significantly change the visual character of the area, as views of and across the Malibu Bluffs property would be maintained.

The extension of subterranean electrical lines to the proposed Park Administration/Employee Quarters, and Fire Truck and equipment storage sheds would introduce a new light source at Malibu Bluffs. Electricity installed at the residential quarters would be for lighting, while at the sheds it would be for the use of lighting and charging of equipment. The lighting associated with the employee quarters and storage sheds would not be expected to be significant enough to affect existing day or nighttime views in the area. Furthermore, the electrical hook-ups at each campsite cook station would be for the use of electrical hotplates and/or griddles for cooking and would not generate a new light source. Therefore, implementation of the park improvements would

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not have a significant adverse impact to light sensitive land uses, such as the surrounding residential neighborhoods in proximity to Malibu Bluffs.

Consistent with the Coastal Act and Malibu LCP, the Plan and associated improvements at Malibu Bluffs will not result in adverse impacts to public views to or from the ocean, and will not be substantially visible from public viewing or otherwise degrade the scenic character of the area.

Corral Canyon Park

Proposed improvements at Corral Canyon Park would largely be invisible to traffic along PCH due to its location on an elevated terrace behind a local ridge above PCH. The proposed Park Administration/Employee Quarters building and a new two-stall restroom facility would be situated behind an existing seafood restaurant, which would shield these structures from view along PCH. Lighting would be provided to the Park Administration/Employee Quarter and Fire Truck storage shed, thus, introducing a new light source at Corral Canyon Park. Electricity installed at the employee quarters would be for lighting, while at the shed it would be for the use of lighting and charging of equipment. The lighting associated with these structures would not be expected to be significant enough to affect existing day or nighttime views in the area. Furthermore, the electrical hook-ups at each campsite cook station would be for the use of electrical hotplates and/or griddles for cooking and would not generate a new light source.

Consistent with the Coastal Act and Malibu LCP, the Plan and associated improvements at Corral Canyon Park will not result in adverse impacts to public views to or from the ocean, and will not be substantially visible from public viewing or otherwise degrade the scenic character of the area.

Optional Emergency Fire Shelters

The proposed Plan includes several emergency fire shelters at camp areas and along public trails. The shelters are not considered a crucial component of fire protection planning at the other parks due to the location of the camping areas' relative proximity to highways and/or roadways, as well as in consideration of the other components of the proposed fire protection plan. These shelters are considered optional and would only be installed if required and approved by the appropriate fire agency(ies). The LACFD has indicated that 200 feet of brush clearance would be required around the fire shelters. The proposed Plan includes optional emergency fire shelters at the camping areas of Corral Canyon and Malibu Bluffs, as well as along two trail alignments: Trail 2a6 adjacent to Murphy Way and Trail 13b adjacent to Corral Canyon Road. Although it is unclear that the appropriate agency would ultimately require emergency fire shelters in final design and operation of the Plan improvements, the fire shelters are identified on all project plans and in the PWP as optional.

The fire shelters proposed at Camp Areas 3 and 4 at Malibu Bluffs, and at Camp Area 1 at Corral Canyon Park, would be situated in central locations among the proposed

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camping facilities and would not be visible from any scenic public roads. The optional fire shelter proposed at Trail 2a6 along Murphy Way is situated near the terminus of Murphy Way and site topography naturally screens this shelter from public viewing areas of any scenic designated roadway. The proposed optional fire shelter located at Trail 13b along the east shoulder of Corral Canyon Road would be visible from Corral Canyon Road, a Malibu LCP-designated scenic road. However, two recently constructed single-family homes are located just south of the proposed shelter, so the shelter would not have substantially greater view impacts from Corral Canyon Road than the existing residences. While these fire shelters have been sited to not substantially obstruct views from scenic roadways, the shelters and their required brush clearance for fire protection would be highly visible from public parkland and trails and would have adverse impacts on the scenic quality and character of these parkland areas.

As discussed in the Hazards section of this report, the PWP includes a comprehensive fire protection program for the proposed campgrounds that includes, but is not limited to, a detailed evacuation plan, closure of the park on declared Red Flag Warning days/periods, prohibitions on camp fires, provision of non-flammable, flameless cook stations at campsites, availability and access to water and fire protection equipment, and on-site wildland fire-trained employee/camp host during the times when camping is permitted. In addition, the proposed improvements are situated a short distance from significant public roads and nearby accessible open areas with large expanses of irrigated, low-fuel landscapes that can also serve as a safe refuge in a wildfire emergency. It is considered very unlikely that a wildfire scenario would preclude safe relocation. Excluding the fire shelters, the proposed fire safety provisions of the Plan are thorough, reasonable, and practical for assuring maximum safety for life and property. The fire shelters are not a proven integral component to the parkland fire protection plans and are not necessary even as a last-resort fire protection measure. As discussed in more detail in the Hazards section of this staff report, the Commission finds that the proposed siting and design of improvements and associated fire safety measures included in the PWP (excluding the optional fire shelters) minimizes risk to life and property from fire hazard and is consistent with the relevant policies of the Coastal Act and Malibu LCP.

The Commission notes that it has been provided no precedent and it is aware of no precedent for on-site emergency fire shelters being required in public parklands or along public trails anywhere in the Malibu-Santa Monica Mountains area, or, for that matter, anywhere in the United States. In addition, no evidence has been provided that demonstrate the shelters would assure any significant increase in safety for park/trail users or function effectively for their intended purpose. Furthermore, there are no known building design standards for such fire shelters. Given the lack of evidence and precedents, the fire shelters are not considered a crucial component of fire protection planning for the proposed park and trail improvements.

The precedent of requiring fire shelters along public trail routes in natural parkland areas is particularly problematic. The proposed fire shelter structures and required fuel

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modification surrounding the shelters is completely incompatible with the natural landscape and scenic natural park setting and would result in the unnecessary removal of native habitat and unnecessary adverse impacts on the scenic quality of the park/trail experience. The trails proposed in this plan do not present any greater risk relative to wildland fires, or any other risks for that matter, than any other trail in the Santa Monica Mountains or any other natural parkland area of California. There is a certain level of acceptable risk associated with hiking on trails in natural areas. It is not reasonable to expect a park agency or local jurisdiction to mitigate fire risks along public trails through the placement of fire shelters. As a practical matter, these shelters would have to remain unlocked and would be an attractive nuisance that would invite vandalism, graffiti, and other illicit activities. In addition, the precedent of requiring fire shelters along public trails in natural parkland areas throughout the Santa Monica Mountains has potentially significant cumulative impacts on coastal and scenic resources.

The proposed fire protection measures of the Plan include reasonable provisions for the closure of parks to all recreational use, including trail use, during any Red Flag Day/period as declared for the Santa Monica Mountains area by the National Weather Service. Park properties would be posted and patrolled to inform visitors of closures.

Although the proposed optional fire shelters have been located in close proximity to camp facilities, existing roads and disturbed areas, the shelters would still have unavoidable impacts to scenic resources. There is no basis for determining that fire shelters are an integral component to public park use and necessary to assure safety. As such, the Commission finds that the proposed optional fire shelters are inconsistent with the scenic resource policies of the Coastal Act and Malibu LCP. Therefore, **Suggested Modifications 41, 52, and 53** are required to ensure this element of the proposed plan and all references to it are deleted.

In conclusion, the Commission finds that proposed improvements included in the Plan (with the exception of emergency fire shelters) have been appropriately located to protect the scenic and visual qualities of the Plan area. New development at each park area has been clustered, sited in level areas to minimize grading and landform alteration, and within areas where existing vegetation and the natural topography minimize visibility of the improvement locations from scenic roads. The proposed Plan includes several implementation measures designed to ensure new development minimizes impacts to visual resources through landscape screening, revegetation of graded and disturbed areas, and designing structures with earth-tone colors to blend with the surrounding landscape. The Commission finds that the PWP, if modified as suggested, will ensure that scenic resources will be protected. As such, the Commission finds that the proposed Plan, if modified as suggested, is consistent with the Malibu LCP policies and provisions cited regarding the protection of visual resources for the portions of the plan within the City of Malibu. Further, the Commission finds that the portion of the proposed Plan located in unincorporated areas, if modified as suggested, is consistent with Coastal Act policies cited, and the guidance provided by the cited policies of the Los Angeles County LUP regarding the protection of visual resources.

6. Archaeological Resources

a. Relevant Policies

The Coastal Act, Los Angeles County Malibu-Santa Monica Mountains Land Use Plan, and the City of Malibu certified LCP contain policies regarding the protection of cultural resources. Due to the length of relevant policy language, the following relevant policies are attached as Exhibit 12 of this staff report.

Coastal Act Section 30244.

Los Angeles County LUP Policies: P169, and P175.

Malibu LCP Policies: 5.60, 5.61, 5.62, 5.63, 5.64, LIP Section 3.4.2.D.

b. Analysis

Coastal Act Section 30224 requires that reasonable mitigation measures be required where new development would adversely impact archaeological or paleontological resources. In addition, Malibu LCP Policies 5.60 – 5.64 and Los Angeles County LUP Policies P169 and P175 require that new development, protect, preserve, and minimize impacts to archaeological resources and, where new development is proposed within archaeologically sensitive areas, that appropriate mitigation measures be required and implemented. The Malibu LCP policies require that new development within archaeologically sensitive sites include on-site monitoring by a qualified archaeologist for all grading, excavation, and site preparation. In addition, Malibu LCP policies and County LUP Policy P175 require that development of new park facilities be designed to protect resources of historic, cultural, archaeological and paleontological significance, and that mitigation be implemented where impacts may occur. The Malibu LCP further requires that a Phase I Inventory of cultural resources be conducted by a qualified archaeologist for proposed Plan improvements that involve ground disturbance.

Given the Plan area's proximity to the ocean and the generally undeveloped and natural state of the subject parklands in the Plan area, and the presence of a number of water courses which tend to be areas of high sensitivity for cultural resources, potential impacts to cultural resources that could result from implementing the proposed improvements have been considered in developing the proposed Plan. A Phase 1 Archaeological Resources Report prepared for the proposed Plan by Stone Archaeological Consulting (2007), and subsequent Phase 1 archaeological surveys were conducted for the proposed Plan in October 2009 and January 2010 to assess the presence and potential impacts of the proposed Plan on archaeological resources. The Phase I Investigation includes a written report of the results of a records search through the South Central Coast Information Center at Cal State Fullerton and an intensive field survey of the lands in the Plan area subject to the proposed recreation improvements.

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These studies along with the additional results of the subsequent Phase 1 archaeological surveys are include in the EIR for the proposed Plan.

The analysis contained in the Plan's EIR concludes that there are no recorded prehistoric or historic-period archaeological resources recorded within proposed Plan improvement areas. Long-term use of the recreational facilities, however, would increase the number of individuals using trails and camping areas. In the unlikely event that unknown archaeological resources were to be exposed on the ground surface (for example, after a rainstorm and subsequent sheet flow), there is the remote potential for increased improper collection of archaeological artifacts. Archaeological Resources Implementation Measure 5 of the proposed Plan requires that park signs, maps, public information notices, and website information include notice to inform visitors that disturbance to archaeological sites cannot be reversed, that such resources are of great religious importance to contemporary Native Americans and destruction of archaeological sites on public property is illegal and a punishable offense. This implementation measure is consistent with the relevant archaeological resource policies of the Coastal Act and Malibu LCP and would serve to inform the public that improper disturbance to archaeological artifacts is not allowed, thereby minimizing potential impacts to cultural resources.

Though no prehistoric or historic cultural remains were identified within proposed Plan site areas, the Plan's EIR notes that potential cultural resources were previously identified adjacent to (i.e., within 100 feet of) the proposed ADA drop off site along PCH in the Corral Canyon Park area, as well as the proposed camping facility in the far western portion of Malibu Bluffs. The EIR notes that it is possible that ground disturbances within this vicinity could have a remote potential to identify unknown cultural resources. The EIR further indicates that there is the remote potential that unknown sub-surface cultural material could exist within areas of low archaeological sensitivity on steep slopes and dense vegetation; or they could be buried in proposed improvement areas that were intensively surveyed. To ensure that potential impacts to archaeological resources are minimized, the proposed Plan includes mitigation measures which require a pre-construction workshop with a qualified archaeologist and a local Native American representative to address the following: review the types of archaeological resources that may be uncovered; provide examples of common archaeological artifacts and other cultural materials to examine; describe a reasonable worst-case discovery scenario (i.e., discovery of intact human remains or a substantial midden deposit) and describe reporting requirements and responsibilities of the construction supervisor and crew. The proposed Plan also contains measures that require that all earth disturbances associated with the proposed "ADA drop off" along PCH in the Corral Canyon Park area and the proposed camping facility in the far western portion of Malibu Bluffs be monitored by a qualified archaeologist and a local Native American representative, funded by the applicant, and requires that a Construction Monitoring Treatment Plan shall be developed and implemented to ensure that any new discoveries associated with identified archaeological sites are adequately recorded, evaluated, and if significant, mitigated.

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Implementation of Plan improvements that involve development within the sensitive archaeological sites discussed above would be subject to the extensive archaeological resources implementation measures of the proposed Plan. Grading and excavations within the Plan area would result in maximum cuts of approximately 4- to 8-feet deep into previously undisturbed soil. Excavation at the proposed bridge abutments in Ramirez Canyon Park and at Malibu Bluffs would be approximately 10- to 15-feet deep. The EIR indicates that shallow excavations in the uppermost layers of soils and younger Holocene alluvium in the Malibu area is unlikely to disturb significant vertebrate fossil remains. Implementation of the proposed Plan would, therefore, generally not result in excavations sufficiently deep to encroach within possible geological formations in which paleontological resources could be encountered. However, deeper excavations for bridge abutments in Ramirez Canyon Park and at Malibu Bluffs would potentially encroach into Quaternary geologic age older dissected alluvial gravel, sand and clay that would have the potential to bear important vertebrate fossils. Nevertheless, proposed Plan implementation measures provide that, in the event paleontological soils are uncovered during grading, a paleontological monitor shall be retained to oversee ground disturbing activities including, but not limited to, all grading, excavation, and site preparation, and that appropriate measures are implemented to ensure appropriate recovery and preservation of any paleontological artifacts recovered.

In conclusion, proposed Plan improvements have been sited and designed to avoid potential impacts to archaeological and paleontological resources and, with implementation of the Plan's implementation measures, archaeological and paleontological resources within the Plan area will be protected and preserved to the maximum extent feasible, consistent with Coastal Act Section 30224 and relevant Malibu LCP policies. As such, the Commission finds that the proposed Plan is consistent with the Malibu LCP policies and provisions cited regarding the protection of cultural resources for the portions of the plan within the City of Malibu. Further, the Commission finds that the portion of the proposed Plan located in unincorporated areas is consistent with Coastal Act policies cited, and the guidance provided by the cited policies of the Los Angeles County LUP regarding the protection of cultural resources.

7. Procedures

Coastal Act Section 30605 provides for public works plans (PWP) to be submitted for approval by the Coastal Commission as a means to facilitate review of individual public works projects:

***Section 30605.** To promote greater efficiency for the planning of any public works . . . and as an alternative to project-by-project review, plans for public works . . . may be submitted to the commission for review in the same manner prescribed for the review of local coastal programs as set forth in Chapter 6 commencing with Section 30500). . . .*

Pursuant to this section, the standard of review for plans in areas with certified LCPs is conformity with the LCP. The standard of review for plans in areas without a certified

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LCP is conformity with the Chapter 3 policies of the Coastal Act. In this case, the plan area falls within certified (City of Malibu) and uncertified (unincorporated Los Angeles County) areas, so the standard of review is both the Malibu LCP and the Coastal Act, as applicable. Further, in the unincorporated County of Los Angeles, the Commission has looked to the policies of the certified Malibu/Santa Monica Mountains Land Use Plan (LUP) for guidance.

After approval of a PWP, any subsequent review by the Commission of a “specific project contained in the certified plan” shall be limited to imposing reasonable conditions (PRC 30605, 30607). Coastal Act Section 30606 requires that the public agency proposing a public works project contained in the PWP notify the Commission and other interested persons, organizations, and governmental agencies of the impending development and provide data to show that it is consistent with the certified public works plan at least 30 working days before the development commences.

The Commission’s regulations provide further detail on the review of PWPs and subsequent development reviews pursuant to an approved PWP (CCR division 5.5, sections 13350-13371). In particular, Section 13357(a)(1) establishes that the purpose of the Commission review of a PWP is to “define the scope of review of any subsequent project contained in the plan.” Section 13377(a)(5) states that subsequent Commission review of specific projects contained in the PWP shall be to “determine the conformity of the project with the certified public works plan....” Under CCR Section 13359(b), the Commission may require development conditions to “bring the project into conformance with the approved plan.”

The only development that may be approved pursuant to a certified PWP is that which is specifically contained in the PWP. Therefore, it is critical that the PWP clearly specifies what development is contained in the PWP. Any development not contained in the PWP must be authorized either through the regular coastal development permit review process; or through a PWP amendment approved by the Coastal Commission and subsequent approval through the PWP project review process.

In this case, the PWP proposes specific public access improvement projects that may be pursued in the future under the PWP. With the staff-recommended suggested modifications discussed throughout this report that are necessary to bring the PWP into conformance with the Coastal Act and Malibu LCP, as applicable, the PWP contains sufficient detail on the type, location, and intensity of development that would be authorized by the PWP. The proposed PWP includes a chapter (Chapter 4) that sets forth the procedures for the notice, review, and authorization processes regarding future PWP projects. Chapter 4 also lays out provisions for the SMMC/MRCA to monitor compliance with PWP policies, implementation measures and conditions that are required of a project pursuant to a Notice of Impending Development (NOID), and for SMMC/MRCA to track and monitor maintenance and operations at authorized campgrounds and trails to ensure that parks and trails operate effectively and are adequately maintained.

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Consistent with the Coastal Act, these procedures say that only developments contained in the PWP may be authorized by the SMMC/MRCA. Once authorized, the SMMC/MRCA must notify the Commission, including providing the Commission with a Project Report that summarizes the approved project as well as all relevant environmental information and an evaluation of project consistency with the PWP. Once the Commission receives this notice, it must review the notice to determine whether more information is needed to determine consistency with the PWP. If no information is needed, or once additional information is received that the Executive Director deems adequate for review, the notice is filed. This date triggers a 30 working day period before which the Commission must have a hearing on the proposed development. At the Commission hearing, the Commission may determine that the proposed development is either consistent with the certified PWP, or that conditions are needed to bring the project into conformance with the PWP. The procedures chapter of the PWP also includes subsections regarding development that is exempt from NOID requirements, procedures for PWP amendments, and procedures for emergency authorizations. The Commission finds that there are elements of each of these subsections that are inconsistent with the requirements of the Coastal Act and the California Code of Regulations. Therefore, modifications are suggested to bring them in to conformity with the Coastal Act and the Commission's administrative regulations, as follows:

In order to ensure that the noticing requirement for NOIDs is clear, the Commission recommends Suggested Modification No. 54 to add specific language in Section 4.1.1 of the PWP. In this instance, it is clear that the applicable local government agency would be interested in impending development so this is suggested as part of the modification. Other interested individuals or groups will vary with the location and type of development. To ensure that a person, organization, or government agency is notified, they should communicate their interest with the SMMC/MRCA and request that they be notified.

There are two items included in the Development Excluded from NOID Procedures subsection of the PWP that are not appropriate: 1) development authorized by a coastal development permit issued by the Commission prior to certification of this PWP, and 2) funding, operations, and maintenance activities described in Section 4.5. First of all, development that was previously authorized pursuant to a Coastal Development Permit and has commenced prior to CDP expiration is considered vested and should not be included in the NOID exclusion provision of the PWP. Secondly, the funding, operations, and maintenance subsection of the PWP Procedures chapter regarding a tracking program for park operations and maintenance does not meet the Coastal Act definition of development and should not be included in the NOID exclusion provision either. As such, **Suggested Modification 46** is required to limit the NOID exemption list in the PWP to activities that are consistent with Coastal Act Section 30610 and PRC Section 13252.

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The PWP Amendment procedure language in the Procedures chapter is not consistent with the applicable provisions of the California Code of Regulations. As such, **Suggested Modification 47** is required to reflect the correct PWP amendment procedures pursuant to PRC Section 13365.

Lastly, the Emergency Authorization procedure language in the Procedures chapter is not consistent with Coastal Act Section 30611. Therefore, **Suggested Modification 48** is required to correct the language and make this subsection consistent with Coastal Act Section 30611.

With the modifications described above, the Commission finds the Procedures chapter of the PWP consistent with the applicable policies of the Coastal Act.

Several PWP policies and implementation measures reference the City of Malibu certified LCP and/or the Malibu Parks Public Access Enhancement Plan Overlay contained in the Malibu certified LCP. These references are inappropriate because the PWP should be the stand-alone planning document for the proposed public works projects within the Plan area. The Commission will be finding that the PWP is in conformity with the certified LCP and the Coastal Act, as applicable, so it is not necessary to frame PWP policies and implementation measures in this way. Therefore, **Suggested Modifications 1-15, 17, 19-21, 32, 34, 35, and 36** are required to delete policy and implementation measure references to the Malibu LCP, and where appropriate, add in the actual referenced policy/provision language. These changes will ensure that the PWP is clear regarding requirements for PWP projects.

In addition, several other modifications are necessary to incorporate relevant documents into the PWP, as follows:

- Detailed biological resource identification and mapping was conducted for the proposed Plan as part of the EIR process. These maps are useful for demonstrating baseline biological conditions within the Plan area and should be included in the PWP. As such, **Suggested Modification 49** is required to include the biological resource maps of EIR Appendix MRA-8 as new Figure 10 in the PWP.
- **Suggested Modification 50** is necessary to make changes to the appendices of the PWP. For Appendix A, the Coastal Commission staff report regarding a related Malibu LCP Amendment Override previously certified by the Commission should be replaced by the PWP Concept Plan Set that was included in the PWP submittal but not included as an appendix. For Appendix B, the Policy Consistency Analysis should be replaced by the Biological Concept Mitigation/Restoration Plan Memorandum by Dudek, dated July 26, 2010, to serve as a framework for future required habitat restoration/mitigation plans. The Commission staff report and the policy consistency analysis are background documents to be considered by the Commission in certifying the PWP, but neither serves any useful function for inclusion in the PWP.

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- Table 2 of the proposed PWP is a 7-page table taken from the certified Malibu LCP that outlines all permitted uses for each land use designation in the City. This table is not useful or necessary for inclusion in the Plan. As such, **Suggested Modification 53** is required to delete Table 2, and to re-number the remaining tables accordingly. In addition, Tables 3 and 4 of the PWP summarize facility and trail improvements proposed in the Plan. Minor changes to the tables are needed to change how the PWP Concept Plans are referenced and to make various minor corrections, as discussed below. **Suggested Modification 53** is necessary to effectuate these minor changes to Tables 3 and 4 of the PWP.

On September 22, 2010 the Commission received a letter from SMMC/MRCA that outlines minor corrections and clarifications to the PWP and a request for Commission staff to incorporate them into the PWP through suggested modifications (Exhibit 15). Commission staff has reviewed the proposed changes and determined them to be minor clean-up items that correct or clarify information that is in the PWP Concept Plan set, the EIR, or in other parts of the PWP but that had not carried over correctly to another part of the final PWP submittal. No substantive changes to the type, location, or intensity of development proposed in the Plan are included in these clean-up changes. The changes are consistent with the applicable policies of the Malibu LCP and Coastal Act, as applicable. As such, the Commission finds that **Suggested Modifications 31, 33, 38, 40, 41, 42, 43, 45, 51, and 53** are required to ensure these minor changes are effectuated into the final PWP document. Below is a summary of the changes:

- Suggested Modification 31, 33 and 43 are necessary to correct language regarding fines for violations and to clarify that the existing wooden bridge next to Ramirez Canyon Park may be reinforced or replaced consistent with LACFD requirements.
- Suggested Modification 38 is necessary to correct, in the Scope of Improvements section of the PWP, an inadvertent typographical error in the total number of parking spaces that are proposed in the Plan (157 spaces instead of 169).
- Suggested Modification 40 is necessary to clarify, in the Scope of Improvements section of the PWP regarding camping cook stations, that an MRCA ranger, camp host, and/or staff would be the ones who determine if certain small electrical cooking appliances are permissible.
- Suggested Modification 41 is necessary to clarify, in the Scope of Improvements section of the PWP regarding fire shelters, which building at Ramirez Canyon Park would be retrofitted for use as an emergency fire shelter in each phase of proposed park improvements/uses.
- Suggested Modification 42 is necessary to correct references to what improvements certain proposed trails would lead to, in the Scope of Improvements section of the PWP regarding trail improvements.

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- Suggested Modification 43 is necessary to make various changes to the Fire Protection Plan section in the PWP Scope of Improvements. Instead of referencing the penal code with regards to the camp host authority to enforce regulations, the Public Resources Code and MRCA Ordinance should be referenced. In addition, references to fines for violations needed to be corrected and more specificity is required regarding examples of electrical devices that are not allowed to be used at camp facilities.
- Suggested Modification 45 is necessary to add specificity regarding the proposed limitations for Phase 1 existing small events and employee training/workshops in the Scope of Improvements section of the PWP regarding phasing of Ramirez Canyon Park uses and improvements.
- Suggested Modification 51 is necessary to delete laurel sumac from Table 8: Native Bunchgrass Grasslands Plant Palette of the Biological Concept Mitigation/Restoration Plan Memorandum that will be included as Appendix B of the PWP pursuant to Suggested Modification 50. Laurel sumac is not a typical indicator species of native grassland.
- Suggested Modification 53 is necessary to make various corrections to the Facility Improvements Summary table (Table 3 of PWP) and the Trails Improvements Summary table (Table 4 of PWP) to accurately reflect what is proposed in the PWP.

With the staff-recommended suggested modifications discussed above, the Commission finds the PWP into conformity with the Coastal Act and Malibu LCP, as applicable.

E. ALTERNATIVES ANALYSIS

As discussed above, the proposed PWP includes policies and implementation measures that require future facility development to include mitigation measures that will avoid, minimize, and reduce significant impacts to coastal resources. Additionally, the Commission has suggested modifications to the PWP that will clarify the timing and amount of required mitigation. The Commission has also considered project alternatives that can meet the project objectives while avoiding or reducing significant impacts to coastal resources.

1. Final Environmental Impact Report

The Santa Monica Mountains Conservancy and Mountains Recreation and Conservation Authority certified the FEIR for the subject PWP in August 2010. The FEIR identified and evaluated several alternatives to the originally proposed project. In the end, the SMMC/MRCA adopted an alternative called the “Modified Redesign Alternative” (MRA) as the environmentally superior alternative and ultimately as the adopted PWP submitted for certification by the Commission.

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Section 15126.6 of the CEQA guidelines requires that a range of reasonable alternatives to the project that would feasibly obtain the basic project objectives and avoid or substantially lessen any significant effects of the project be evaluated. Alternatives may be eliminated from detailed analysis if they fail to meet the most basic of project objectives, are determined to be infeasible, or cannot be demonstrated to avoid or lessen significant environmental impacts.

The FEIR states that the project objectives are as follows:

- Enhance public access and recreation opportunities to park facilities in the Plan area to the maximum extent feasible for both local and non-local visitors, and for visitors with diverse backgrounds, interests, ages, and abilities.
- Plan, design and develop trail connections throughout the Plan area and new overnight camping opportunities, and ensure that sufficient support facilities are provided, to readily serve the existing and growing demand for public access and recreation in the Santa Monica Mountains and Malibu coastal area, and to increase accessibility to parklands for all people.
- Develop a continuous inland public access trail system that provides unique and spectacular views of the coast and ocean and, wherever feasible, complete linkages for the Coastal Slope Trail, the Beach to Backbone Trail, from the beach to Malibu Bluffs, and other connector trails to access the coastal mountains and the shoreline.
- Facilitate the California Coastal Trail vision to “Create linkages to other trail systems and to units of the State Park system, and use the Coastal Trail system to increase accessibility to coastal resources from urban population centers.” (Completing the California Coastal Trail, Coastal Conservancy 2003.)
- Secure trail easements and land purchases where necessary and feasible to connect Conservancy/MRCA-owned coastal parks and link with the regionally significant Coastal Slope Trail and Backbone Trail in the City of Malibu and unincorporated County of Los Angeles, and across National Park Service and State Park lands.
- Implement a Beach to Bluffs Trail plan, connecting Malibu Bluffs with existing shoreline access facilities.
- Provide public access to, and promote use of, coastal parks and trails by visitors outside of the City of Malibu, consistent with Coastal Act section 30223: "Upland areas necessary to support coastal recreational uses shall be reserved for such uses, where feasible."
- Provide low-impact and low-cost camping and trail facilities for all persons in the coastal zone, and specifically the Malibu coastal zone.
- Provide for public access and recreation uses and support facilities approved by the Coastal Commission (No. 4-98-334) at Ramirez Canyon Park.
- Provide public outreach at coastal parks and trails, including educational/interpretive/recreational programs, for visitors with diverse backgrounds, interests, ages, and abilities.
- Encourage non-vehicular circulation between park areas and the shoreline as a primary form of circulation.
- Protect and enhance, wherever feasible, sensitive habitats and water quality when developing park facility improvements and when establishing park uses and programs.
- Establish park uses consistent with resource protection policies applicable to specific park areas taking into consideration available support facilities, opportunities to develop new support facilities, accessibility, and protection of natural resources, public safety issues, and neighborhood compatibility.

Alternative Locations

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The EIR included the consideration and rejection of several alternative locations for the proposed project. These locations include public parklands at King Gillette Ranch (KGR), Charmlee Park, Tuna Canyon Park, and Solstice Canyon and Zuma/Trancas Canyon Park.

The EIR determined that the KGR is located at the northernmost, inland portion of the Coastal Zone. While the site is under public ownership and could accomplish some of the objectives of the Plan (including camping, trails, programs, and events), the recreational experiences provided would be different from the parks proposed as part of the subject PWP. KGR would not provide any camping or hiking opportunities in the “Malibu front country”, nor would it make use of several parks within the Malibu area which are currently under public ownership. In addition, no “blue water” views are available from KGR and there would not be any trail connectivity with the Malibu coastline. The EIR rejected this alternative site because KGR: “fails to fulfill many of the basic project objectives and its lack of providing a true blue-water coastal experience (where recreational demand is the greatest)”.

Charmlee Park is located in the City of Malibu and has many of the same qualities as the parklands included in the Plan. However, the EIR determined that: “...Charmlee Park is not a feasible alternative location because, in consultation with the Conservancy/ MRCA, the City has refused to entertain any camping uses within in the Park and only limited parking”. Because this park would not meet all of the project objectives, it was rejected as an alternative location.

Tuna Canyon Park was considered but rejected because of its relatively remote location and limited accessibility. This park area cannot be accessed by Tuna Canyon Road because this road is only one lane wide, outleting at Pacific Coast Highway. The access to the park is located several miles inland and as such, the park cannot provide access to shoreline area or similar connectivity to other parks in the PWP area.

The Solstice Canyon and Zuma/Trancas Canyon Parks are coastal parklands owned by the National Park Service (NPS) located in proximity to the parks in the PWP and have many of the same qualities as these parklands (in fact, portions of the planned trail system extend through the federal property at Solstice Canyon Park). However, the general management plan for these parks does not specifically allow for camping and it is uncertain whether modifications could feasibly be made to add camping to allowed uses. For this reason, the EIR rejected this alternative park location.

Alternative Projects

In addition to the CEQA-mandated consideration of the No Project Alternative, two additional on-site alternatives, the 2002 LCP Alternative and Redesign Alternative were developed as part of the Draft EIR. In response to both oral and written comments received on the Draft Environmental Impact Report (“DEIR”) for the PWP, the SMMC/MRCA revised one of the alternatives detailed in the DEIR to create the Modified

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Redesign Alternative (MRA). The MRA refined the Redesign Alternative Plan contained in the DEIR to reduce all significant and unavoidable impacts to a level of insignificance. The FEIR states that the SMMC/MRCA also created the MRA to further reduce those impacts deemed insignificant (with or without mitigation) in the DEIR, but that were of concern to the public. The intent was to make use of the comments received, and the analysis contained in the DEIR, to develop an alternative which was environmentally superior to the Proposed Plan analyzed in the DEIR.

Following is a brief description of the four project alternatives considered in the FEIR.

Alternative 1: No Project Alternative

CEQA Guidelines Section 15126.6(e) states that the No Project Alternative should examine what would be reasonably expected to occur in the foreseeable future if the Plan were not approved, based on current plans and consistent with available infrastructure and community services. When the project is the revision of an existing land use or regulatory plan, policy, or ongoing operation, the “no project” alternative would be the continuation of the existing plan, policy, or operation into the future.

The No Project Alternative assumes continuation of the existing park operations at Escondido Canyon Park, Corral Canyon Park and the Malibu Bluffs Conservancy Property. With respect to Latigo Trailhead, the No Project Alternative assumes that the property would remain vacant open space for the foreseeable future. With respect to Ramirez Canyon Park, the No Project Alternative assumes that the park property would be closed and all existing uses discontinued. No new development would occur at any of the parklands other than the proposed Ramirez Canyon Creek Enhancement/Restoration Plan, which would be implemented according to proposed project plans, and continued fuel modification activities as mandated by fire agencies. The proposed Fire Protection Plan (that was part of the originally proposed PWP) would not be implemented at any of the park sites and road improvements to facilitate emergency ingress/egress on Delaplane, Ramirez Canyon Road, and Via Acero would not be constructed.

Alternative 2: 2002 LCP Alternative Plan (Reduced Project)

The 2002 LCP “Reduced” Plan Alternative would maintain many of the goals, policies, and objectives of the originally proposed PWP, but was designed to be generally consistent with original 2002 LCP (with amendments), that was in effect prior to the certification of City of Malibu LCP Amendment 1-08 that added the Malibu Parks Public Access Enhancement Plan Overlay. The 2002 LCP Project would have a total of 49 campsites and 96 parking spaces, which would be an approximate 30% reduction in the camp sites and a 11% reduction (Existing + Proposed Spaces) in the parking spaces when compared to the originally proposed PWP. With respect to camping and related facilities, because the 2002 LCP did not originally allow for ESHA impacts for these activities/ structures, camping sites and restroom facilities were eliminated from a

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number of locations when compared to the proposed Plan. Campsites have largely been replaced with picnic tables at these locations. Under this alternative, the secondary access to Ramirez Canyon Park associated with the originally proposed PWP would no longer be facilitated by an extension of Via Acero to Kanan Dume, but would instead utilize the Lauber property (AIN 4467-002-068 and 4467-002-067), which the Conservancy/ MRCA has determined may be available for purchase and which has already been largely graded and re-contoured in preparation for residential development.

Alternative 3: Redesign Alternative Plan

The Redesign Alternative Plan would maintain all of the goals, policies, and objectives of the originally proposed PWP, but has been designed to minimize Class I and Class II environmental impacts associated with the originally proposed PWP. The Redesign Alternative Project would have a total of 54 campsites and 106 parking spaces, which would be an approximate 24% reduction in the camp sites and a 14% reduction (Existing + Proposed Spaces) in the parking spaces when compared to the originally proposed PWP. The Redesign Alternative would utilize the Lauber property (AIN 4467-002-068 and 4467-002-067), for secondary access to Ramirez Canyon Park. A 20-foot wide access road/ trail would be installed/ improved from the Lauber property's western-most extent at Kanan Dume Road to its eastern connection down in the canyon below at Ramirez Canyon Road. With respect to camping and related facilities, to avoid and/or minimize geologic and ESHA impacts related to the originally proposed PWP, camping sites and restroom facilities have either been eliminated or re-located at a number of locations when compared to the proposed Plan. Similar to the 2002 LCP Alternative, the Redesign Alternative would reduce the number of camp sites and restroom facilities at specific Parks. Campsites, in some cases, have been replaced with picnic tables.

Alternative 4: Modified Redesign Alternative Plan

The Modified Redesign Alternative would maintain all of the goals, policies, and objectives of the originally proposed PWP, but has been designed (as a modification of the Redesign Alternative) to avoid Class I and minimize Class II environmental impacts associated with the originally proposed PWP and address the concerns raised during the public review period. The Modified Redesign Alternative would have a total of 54 campsites and 73 new parking spaces, which would have an approximate 24% reduction in camp sites and a 22% reduction (Existing + Proposed) in parking spaces when compared to the originally proposed PWP. With respect to camping, in summary, the Modified Redesign Alternative consists of clustered camping primarily at two park locations along the bluffs overlooking the ocean, close to Pacific Coast Highway in Corral Canyon Park and Malibu Bluffs Conservancy Property. It should be noted that in comparison to the originally proposed PWP, no campsites at Corral Canyon Park would be located along the creek as in the original originally proposed PWP. Under this alternative, no camping is proposed at Escondido Canyon Park or Latigo Trailhead.

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Latigo Trailhead would be improved as a trailhead/ day-use facility only (e.g., parking, restrooms, trails, picnic areas, etc.), while activity at Escondido Canyon Park would be limited to trails. Only two accessible campsites are proposed at Ramirez Canyon Park as part of Phase 2 development. The Modified Redesign Alternative’s campsites are considered “clustered” because they are focused primarily on only two park locations (when compared to the Proposed Plan), and within each of those two parks, the campsites would be located within relatively close proximity to each other in order to facilitate the active monitoring and patrolling of campsite activity by MRCA Rangers, camp hosts, and staff.

Following is a summary of the number of campsites that are part of each alternative for each of the five parks within the PWP area.

NUMBER OF CAMPSITES PER PARK						
	Ramirez	Escondido	Latigo	Corral	Bluffs	Total
Original Proposal	5	13	5	16	32	71
2002 LCP Alternative	1	4	0	11	33	49
Redesign Alternative	3	4	3	11	33	54
Adopted PWP (MRA)	2	0	0	17	35	54

Section 15126.6 (e)(2) of the State CEQA Guidelines requires that an Environmentally Superior Alternative be identified among the selected alternatives (excluding the No Project alternative). The SMMC/MRCA determined that the Modified Redesign Alternative is the Environmentally Superior Alternative because it is the only alternative that reduces both of the originally proposed PWP’s unavoidable environmental impacts, to a level that is significant but mitigatable. The Modified Redesign Alternative also provides more of the park and recreational amenities than the other alternatives and comes closest to fully achieving the project objectives of the four alternatives. In addition, the Modified Redesign Alternative includes a number of features designed to address community concerns, which are not included in the other alternatives. As a result of the detailed analysis of alternatives carried out as part of the FEIR, the SMMC/MRCA determined that as the environmentally superior alternative, the Modified Redesign Alternative would be adopted as the Malibu Parks Public Access Enhancement Plan Public Works Plan and submitted to the Commission for certification.

2. Commission Consideration of Alternatives

Alternative Locations

In addition to the project objectives identified by the SMMC/MRCA in the FEIR, the Commission finds that in terms of Coastal Act and Malibu LCP goals and policies, the

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project objectives are also to ensure maximum public access to coastal areas for all the people, to reserve upland areas necessary to support coastal recreational uses, to provide lower cost visitor and recreational facilities, and to distribute public recreational facilities, throughout the area so as to mitigate against the impacts, social and otherwise, of overcrowding or overuse by the public of any single area.

With regard to alternative locations for the facilities that are part of the proposed PWP, the Commission finds that Charmlee Park and the Solstice Canyon and Zuma/Trancas Canyon Parks are not feasible alternatives because the full complement of recreational uses proposed by the PWP could not be provided at any of these parks. In particular, lower cost visitor accommodations such as camping would not be allowed. Tuna Canyon Park would not avoid or reduce significant environmental impacts given the remote location, difficulty of accessing the site and rugged terrain. If this location were used for camping facilities, emergency evacuation would be much more difficult than the proposed locations at Corral Canyon and Bluffs Park that are directly adjacent to Pacific Coast Highway. With regard to KGR, it is clear that this park could accommodate many of the uses proposed in the PWP, including camping. Hopefully, additional recreational uses will be developed at KGR in the future but this should complement, not replace the uses proposed for the PWP area. Selection of this alternative location would result in the concentration of recreational facilities in one location. This would not be consistent with the goal of distributing facilities throughout the coastal zone area in order to avoid overcrowding or overuse of any one area. Additionally, the Commission finds that KGR would not provide the same range of recreational experiences in that it is several miles from the coast. As such, camping provided at this site would not provide lower cost visitor accommodations where visitors could readily access the coast.

Project Alternatives

The Commission has considered the proposed Malibu Parks Public Access Enhancement Plan PWP (which was previously identified as the "Modified Redesign Alternative" in the FEIR). As described in detail above, the Commission finds that the proposed PWP, if modified as suggested, is consistent with the Malibu LCP (for the areas within the City) and with the Coastal Act with the Los Angeles County LUP policies for guidance (for the unincorporated areas).

Nonetheless, the Commission has also considered project alternatives to determine if there is any alternative that can meet the project objectives while avoiding or reducing significant impacts to coastal resources. In addition to the project objectives identified in the FEIR, the Commission finds that the project objectives identified by the Coastal Act and Malibu LCP goals and policies are to ensure maximum public access to coastal areas for all the people, to reserve upland areas necessary to support coastal recreational uses, to provide lower cost visitor and recreational facilities, and to distribute public recreational facilities, throughout the area so as to mitigate against the impacts, social and otherwise, of overcrowding or overuse by the public of any single area.

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The alternatives considered by the Commission include those considered in the FEIR, namely the No Project Alternative, 2002 LCP Alternative, and the Redesign Alternative. Additionally, since the “Proposed Project” (originally proposed PWP) considered in the FEIR was not adopted, the Commission analyzed that project as an alternative to the PWP adopted by the SMMC/MRCA and considered for certification herein.

Another obvious project modification would be to delete camping uses from the parks in the PWP area. An alternative project that would not implement any campsites within the plan area would reduce environmental impacts. However, such an alternative would not meet the objectives of the project. Although the proposed campsites will have environmental impacts, they have been sited and designed to avoid or minimize impacts to ESHA and other coastal resources to the maximum extent feasible and mitigation measures are required to further reduce impacts, as described in detail above. Additionally, the type of low-impact campsites proposed in the PWP is considered a resource dependent use that is allowable in ESHA pursuant to the policies of the Malibu LCP. An alternative PWP that does not include camping could not meet the objective of providing maximum public access to coastal areas for all the people. In particular, such an alternative would not provide lower cost overnight accommodations that are so critical in providing access and recreation opportunities to the public and that are rare in this area of the coast. The Commission finds that this potential alternative must be rejected because such an alternative PWP that does not include any camping could not meet the project objectives.

No Project Alternative

Under the No Project Alternative, no new park uses or recreation improvements would occur. Existing facilities, including parking lots, trails, etc. would remain in place. Recreational uses of the parks within the PWP area would continue. This alternative would avoid all impacts to coastal resources from the proposed project.

However, the Commission finds that while the No Project Alternative would substantially lessen any significant adverse environmental effects that the proposal would otherwise have on the environment, it would not meet any of the project objectives. This alternative would not provide for a full range of access and recreational opportunities, particularly it would not provide any lower cost visitor accommodations.

Original PWP Proposal

The Malibu Parks Public Access Enhancement Plan PWP that was originally proposed was considered as the “Proposed Project” in the DEIR. The Commission considers it here as an alternative to the PWP adopted on August 23, 2010.

Many of the facilities considered would be the same in this alternative as in the proposed project. For instance, the proposed trail alignments remain the same and both

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projects include the potential improvements to Via Acero as a secondary emergency access to Ramirez Canyon Park (although the proposed project includes phased development at Ramirez related to completion of secondary access, if required by the appropriate fire agency). This alternative includes a total of 71 campsites with camping at each of the five parks in the Plan area, compared with 54 total campsites in the proposed project. This alternative would increase recreational opportunities. In addition to the greater number of campsites, there would also be a parking lot and support facilities at Escondido Canyon Park. These additional facilities, along with those at Latigo Trailhead would allow for greater public use than the proposed project.

In this case, there would be one less campsite at Corral and 3 fewer campsites at Bluffs Parks compared to the proposed PWP. This would result in a minimal reduction in ESHA impacts associated with these campsites. However, the proposal includes 5 campsites at Ramirez Canyon Park, 13 campsites at Escondido, and 5 campsites at Latigo Trailhead. While these facilities were sited and designed to minimize impacts to ESHA, the impacts would nonetheless be greater than the adopted PWP which includes only 2 campsites at Ramirez Canyon Park (in Phase II) and no campsites at Escondido Park or Latigo Trailhead.

This alternative would not include on-site camp host facilities. Escondido Canyon and Latigo Trailhead are not directly adjacent to Pacific Coast Highway for emergency evacuation. As such, the camping uses at Escondido Canyon and Latigo Trailhead in this alternative could present more risks from fire hazard than the proposed project. Further, a portion of the Latigo Trailhead site is affected by a landslide and the development proposed in this alternative would result in unavoidable impacts from geologic hazards that are significantly reduced in the proposed project.

So, the Commission finds that while the project originally considered by the SMMC/MRCA would meet the project objectives and even provide more recreational opportunities than the proposed project, it would not substantially lessen any significant adverse environmental effects that the proposal would otherwise have on the environment.

2002 LCP Alternative Plan

Many of the facilities considered would be the same in this alternative as in the proposed project. For instance, the proposed trail alignments remain the same. This alternative includes a total of 49 campsites with camping at four of the five parks (no camping would be provided at Latigo Trailhead) in the Plan area, compared with 54 total campsites in the proposed project. This alternative would decrease lower cost visitor accommodations overall. On the other hand, there would be a small increase in the number of campsites as well as a parking lot and support facilities at Escondido Canyon Park, thereby increasing recreational opportunities at this park as part of this alternative.

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This would be reduction in total campsites from the proposed project, with the reduction from 2 to 1 campsite at Ramirez Canyon Park, an increase from zero to 4 campsites at Escondido Canyon, reduction from 17 to 11 campsites at Corral Canyon and reduction of 35 to 33 campsites at Malibu Bluffs. The overall reduction in number of campsites would result in a minor reduction in impacts to ESHA that would be balanced against an increase in ESHA impacts at Escondido resulting from the four proposed campsites. Additionally, this alternative includes the construction of an extension to the existing road on the Lauber property to provide a secondary emergency access to Ramirez Canyon Park. Although a substantial portion of the road was already constructed as part of a residential project, the remaining portion that would need to be constructed would be located on steep terrain and would require a greater amount of grading and impacts to ESHA than the improvements to Via Acero that are part of the proposed project.

This alternative would not include on-site camp host facilities. Escondido Canyon Park is not directly adjacent to Pacific Coast Highway for emergency evacuation. As such, the camping uses at Escondido Canyon in this alternative could present more risks from fire hazard than the proposed project.

So, the Commission finds that while the 2002 LCP Alternative would meet some of the project objectives, it would provide fewer recreational opportunities than the proposed project (with the exception of the addition of camping and parking lot at Escondido Canyon Park). Further, this alternative would not substantially lessen any significant adverse environmental effects that the proposal would otherwise have on the environment.

Redesign Alternative

Many of the facilities considered would be the same in this alternative as in the proposed project. For instance, the proposed trail alignments remain the same. This alternative includes a total of 54 campsites with camping at each of the five parks in the Plan area. As such, lower cost visitor accommodations would retain the same number overall. On the other hand, there would be a small increase in the number of campsites as well as a parking lot and support facilities at Escondido Canyon Park, thereby increasing recreational opportunities at this park as part of this alternative.

In this case, there would be six fewer campsites at Corral, two fewer campsites at Bluffs Parks compared to the proposed PWP. This would result in a minimal reduction in ESHA impacts associated with these campsites. However, the proposal includes one additional campsite at Ramirez Canyon Park, 4 campsites at Escondido, and 3 campsites at Latigo Trailhead. While these facilities were sited and designed to minimize impacts to ESHA, the impacts would nonetheless be greater than the adopted PWP which includes only 2 campsites at Ramirez Canyon Park (in Phase II) and no campsites at Escondido Park or Latigo Trailhead.

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This alternative would not include permanent on-site camp host facilities. Escondido Canyon and Latigo Trailhead are not directly adjacent to Pacific Coast Highway for emergency evacuation. As such, the camping uses at Escondido Canyon and Latigo Trailhead in this alternative could present more risks from fire hazard than the proposed project. Further, a portion of the Latigo Trailhead site is affected by a landslide and the development proposed in this alternative would result in unavoidable impacts from geologic hazards that are significantly reduced in the proposed project.

Additionally, this alternative includes the construction of an extension to the existing road on the Lauber property to provide a secondary emergency access to Ramirez Canyon Park. Although a substantial portion of the road was already constructed as part of a residential project, the remaining portion that would need to be constructed would be located on steep terrain and would require a greater amount of grading and impacts to ESHA than the improvements to Via Acero that are part of the proposed project.

The Commission finds that while the Redesign Alternative would meet most of the project objectives, it would not substantially lessen any significant adverse environmental effects that the proposal would otherwise have on the environment.

F. RESPONSE TO COMMENTS

1. Donald Nierlich, L.A. County Coordinator for Coastwalk California, submitted a letter on October 6, 2010 in support of the proposed PWP and the staff recommendation. This letter is attached as part of Exhibit 21.
2. David Brown, Conservation Chair of the Angeles Chapter of the Sierra Club, submitted a letter on October 7, 2010 in support of the proposed PWP and the staff recommendation. This letter is attached as part of Exhibit 21.
3. Edith Morgan, a resident at 25377 Malibu Road, submitted a letter on October 11, 2010 in opposition to camping in the area. This letter is attached as part of Exhibit 21.
4. On October 11, 2010, staff received a letter from Una Glass, Executive Director of Coastwalk California, in support of the proposed PWP and the staff recommendation. This letter is attached as part of Exhibit 21.
5. On October 7, 2010, staff received a letter from Vic Peterson, Community Development Director of the City of Malibu. This letter is attached as part of Exhibit 21. The City expresses opposition to the PWP being considered by the Commission at the October hearing for the following stated reasons.
 - a. The City asserts that there has not been adequate time to review and respond to the staff recommendation.

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Response:

Pursuant to 14 CCR Section 13357(a)(2)-(3), Commission consultation with the affected local government must be initiated at least 10 working days prior to the first public hearing on a proposed PWP. Consistent with this regulation, Commission staff consulted with the City of Malibu and requested input on the PWP submittal on September 14, 2010, which is nearly 30 days before the first scheduled public hearing. The Commission staff report was then published on September 29, 2010 and available on-line for public viewing on September 30, 2010. Adequate notice was provided to all affected and interested parties via written notice and newspaper publication notice at least 10 days prior to the public hearing, consistent with 14 CCR Sections 13059 and 13063. In addition, pursuant to California Code of Regulations Sections 13356 and 13357, public works plans must be scheduled for a public hearing within 60 days of filing of the plan. The 60th day after filing the plan is November 1, 2010.

- b. The City asserts that the staff report was not circulated for at least 30 days, as required by CEQA.

Response:

An EIR was prepared for the proposed PWP, properly circulated as required by law, and certified by the co-lead agencies, the Santa Monica Mountains Conservancy and the Mountains Recreation and Conservation Authority. The Coastal Commission was a responsible agency, not a lead agency, in the EIR process. As a responsible agency, the Commission must rely on the lead agency's EIR and is not required to prepare and circulate an EIR pursuant to CEQA. And as discussed above, the California Code of Regulations require the Commission to consult with the affected local government, schedule public works plan applications for hearing within 60 days of filing, and provide notice. The Commission has followed the procedural requirements for circulation and notice consistent with our agencies specific regulations.

- c. The City asserts that the proposed employee housing at Malibu Bluffs and Corral Canyon Park are considered single-family residences with associated wastewater treatment systems that have not been adequately analyzed and are not an allowed use in the Malibu Parks Public Access Enhancement Plan Overlay and the Public Open Space zone of the Malibu LCP.

Response:

Park Administration/Employee Quarters buildings are proposed at the two primary camping sites, Corral Canyon Park and Malibu Bluffs Property, to

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station and to provide over-night accommodations for MRCA rangers and/or wildland fire-trained specialists who would be patrolling and supervising the parks when camping is permitted. The buildings are modestly sized and minimally equipped. The building at Corral Canyon Park is proposed to be a maximum of 600 sq. ft. The two buildings at Malibu Bluffs are proposed to be a maximum of 400 sq. ft. each. The Park Administration/Employee Quarters would have simple amenities, including a sink and shower. Gray water generated from the sink and shower would be captured in an on-site underground holding tank (2,000-gal maximum capacity) that would be periodically pumped and taken off-site. Self-contained vault restrooms for ranger/employee use are proposed adjacent to the employee quarters buildings. The self-contained restrooms would also be regularly pumped and taken off-site. As such, the proposed Park Administration/Employee Quarters buildings are not designed, sized, or used for single-family residential use and are not associated with a septic treatment system. The buildings have been sited and designed to avoid adverse impacts to coastal resources. In addition, Malibu LCP Policy 5.71 states that ranger/maintenance supervisor housing and administrative personnel facilities related to public parkland operation and maintenance are considered support facilities that are permitted in the Malibu Parks Public Access Enhancement Overlay. The Corral Canyon Park and Malibu Bluffs Conservancy Property are situated within the Malibu Parks Public Access Enhancement Overlay where the type of housing proposed is allowed.

- d. The City asserts that the proposed campsites and employee housing at Malibu Bluffs have not been clustered to the maximum extent feasible in order to minimize impacts to ESHA. Less development at this park would be less environmentally damaging. In addition, the City asserts that a determination has not been made regarding whether the disturbed vegetation areas at Malibu Bluffs where development is proposed was legally or illegally removed or degraded. Areas that were illegally degraded should be afforded ESHA protections.

Response:

Of all of the parkland included in the public works plan area, proposed campsites have been clustered into two primary areas—Corral Canyon Park and Malibu Bluffs. Camping was not proposed at Escondido Canyon Park or Latigo Trailhead property. At Malibu Bluffs, the Plan includes a total of 35 campsites situated within four areas. The park property is of a size that is capable of accommodating the proposed type and level of park use. Proposed improvements have been sited and designed to locate new facilities within previously disturbed and level areas of the property to the maximum extent feasible. Only 0.07 acre of ESHA will be impacted by the

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proposed improvements. Consistent with relevant ESHA and water quality protection policies of the Malibu LCP, the proposed improvements that will minimally impact ESHA are considered resource dependent uses and allowed in ESHA. And the proposed resource dependent improvements have been sited and clustered to minimize disturbance into sensitive habitat areas to the maximum extent feasible. Further clustering or a reduction in improvements would not result in any significant reduction in impacts. In addition, there is no evidence that the disturbed areas of the Malibu Bluffs property were disturbed/degraded illegally. In reviewing the Draft EIR and the proposed PWP, Commission staff had reviewed aerial photographs from 1972 to present of the Malibu Bluffs property and found that the areas mapped as disturbed/non-ESHA in the EIR were within the areas of vegetation disturbance evident in the aerial photos beginning with 1972 (prior to the effective date of the Coastal Act), and through to the present.

- e. The City of Malibu comments that the PWP's proposed notification procedure is inconsistent with coastal development permit noticing requirements. It further stated that the NOID process should be modified to require notice be provided to the City of Malibu as soon as the NOID is provided to the Commission and that neighboring property owners be noticed consistent with LCP requirements for coastal development permits.

Section 30606 of the Coastal Act establishes the noticing requirements for PWP notices of impending development. Section 30606 states that:

Prior to the commencement of any development pursuant to Section 30605, the public agency proposing the public works project, or state university or college or private university, shall notify the commission and other interested persons, organizations, and governmental agencies of the impending development and provide data to show that it is consistent with the certified public works plan or long-range development plan. No development shall take place within 30 working days after the notice.

This requirement is discussed in Section 2.4.1 of the proposed PWP. Further, Section 4.1.1 of the proposed PWP details the NOID procedures and Section 4.1.3 provides requirements for NOID sites to be posted to provide notice of the impending development. While these NOID procedures require that the SMMC/MRCA submit to the Commission a mailing list identifying the agencies and people to whom a copy of the NOID was provided, as well as require that notices be posted within a certain time frame, there is no specific requirement regarding the timing of notices or to whom notice must be provided.

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In order to ensure that the noticing requirement for NOIDs is clear, the Commission recommends adding Suggested Modification No. 54 to add specific language in Section 4.1.1 of the PWP. In this instance, it is clear that the applicable local government agency would be interested in impending development so this is suggested as part of the modification. Other interested individuals or groups will vary with the location and type of development. To ensure that a person, organization, or government agency is notified, they should communicate their interest with the SMMC/MRCA and request that they be notified.

6. On October 11, 2010, staff received a letter from the Corral Canyon Fire Safety Alliance expressing concern regarding fire safety and the overnight camping element of the proposed PWP, and requesting that the Commission incorporate the following conditions of plan approval:
 - i. SMMC should conduct weather study of the canyon area
 - ii. SMMC should meet with the Alliance to discuss methods for mitigating fire risk
 - iii. All plans obtain final approval by CALFIRE and LACFD.

This letter is attached as part of Exhibit 21.

Response:

Fire risk throughout the plan area was extensively studied as part of the August 2010 Fire Protection Plan by Dudek and the EIR. Analysis of fire hazards and associated mitigation/implementation measures to minimize fire hazards are discussed in the Hazards section of this staff report. As such, the concerns raised have been addressed.

7. On October 11, 2010, staff received correspondence from Steve Amerikaner of Brownstein Hyatt Farber Schreck and Diane Matsinger, Esq. who are representing the residents of Ramirez Canyon (Ramirez Canyon Preservation Fund). On October 12, 2010, staff received errata to the letter that corrects several misidentified references in the letter. The correspondence and errata is attached as part of Exhibit 21. The letter expresses opposition to the proposed PWP and the staff recommendation and asserts that it is inconsistent with the Coastal Act and Malibu LCP.

Response:

The Ramirez Canyon Preservation Fund correspondence states that an adequate and timely comment period was not provided to the public on this item. This comment is addressed above in response to City of Malibu comments.

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The Ramirez Canyon Preservation Fund correspondence states that proposed administrative and event uses at Ramirez Canyon Park are unlawful for inclusion in a public works plan because the uses are not directly related to recreation and the plan's recreational facilities. The Commission disagrees. The proposed administrative and event uses at Ramirez Canyon Park support the SMMC public access and recreation programs throughout the plan area and are appropriate for inclusion in the plan. The Ramirez Canyon Preservation Fund correspondence also states that proposed uses at Ramirez Canyon Park are incompatible with the surrounding private residential uses in the area. The uses at Ramirez Canyon Park have been analyzed in this staff report and found consistent with the applicable policies of the Coastal Act and Malibu LCP.

The Ramirez Canyon Preservation Fund correspondence states that the PWP submittal is inconsistent with the information requirements of PRC Section 13353 as it did not include specific enough information about the type of activities proposed related to Ramirez Canyon Park and that there have been unpermitted improvements to structures within the park that were not analyzed. The proposed PWP submittal included specific information regarding the proposed facilities and activities that met the information requirements of PRC Section 13353 and allowed sufficient analysis of all environmental impacts. In addition, the commenter did not provide any evidence to support the assertion that unpermitted structural improvements had occurred at Ramirez Canyon Park. Staff is not aware of any evidence of any unpermitted development at Ramirez that was not addressed in the Commission's September 29, 2010 staff report.

The Ramirez Canyon Preservation Fund correspondence states that for portions of the proposed trail network, the SMMC/MRCA does not presently possess development rights and that these trail segments cannot properly be included in the plan. Staff would note that the proposed PWP defines the proposed trail alignments and at the time a specific trail project included in the plan is proposed for implementation as part of a Notice of Impending Development, the SMMC/MRCA would have to demonstrate their legal ability to undertake the project. The Ramirez Canyon Preservation Fund correspondence also states that the proposed PWP Trails Map is not consistent with the Malibu Parks Public Access Enhancement Plan Overlay Trails Map of the Malibu LCP. Staff would note that although there are some minor differences in trail alignment between the two maps, the PWP trails map is a refinement of the Overlay Trails Map general depiction of the trail alignments and the differences between them are insignificant.

The Ramirez Canyon Preservation Fund correspondence states that the proposed widening of Ramirez Canyon Road would result in adverse impacts to visual resources and ESHA that had not been adequately analyzed. Staff would note that the proposed road widening along Ramirez Canyon Road and associated impacts to native and non-native trees would not result in degradation of visual resources because the area is not visible from any public viewing areas and the development

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would not significantly alter the character of the area. In addition, Ramirez Canyon Road is a substantially developed residential corridor and the proposed road widening would not impact areas that are considered ESHA. Analysis of impacts to ESHA as a result of the Ramirez Canyon Road widening is discussed in the ESHA section of this staff report.

The Ramirez Canyon Preservation Fund correspondence states that areas mapped as ESHA in the Malibu LCP cannot be undesignated by the Commission without going through a map change process that is approved by the City and the Commission. Commission staff would note that the Malibu LCP (LIP Section 4.3) states that the physical extent of habitat on a project site that meets the definition of ESHA must be determined by a site-specific biological assessment. If an area is not determined to be ESHA then the ESHA protection policies of the LCP would not apply. An official ESHA map change is not required to be made prior to permitting development.

The Ramirez Canyon Preservation Fund correspondence states that access to Ramirez Canyon Park should be accomplished by a direct connection to a public road and that the Lauber site analyzed as an alternative in the EIR is a feasible and environmentally preferred alternative for providing park access. However, Ramirez Canyon Road is currently the only means for accessing the park and is specifically contemplated in the Malibu LCP. The proposed Via Acero roadway is only a means for secondary emergency access, and as discussed in the staff report, proposed improvements to Via Acero Road would involve less grading and impacts to ESHA than the Lauber road would. As such, the Via Acero Road is the environmentally less damaging alternative to provide for secondary emergency access.

8. On October 12, 2010 and October 13, 2010, staff received letters from the Santa Monica Mountains Conservancy that responds to the October 11, 2010 letter by Steve Amerikaner of Brownstein Hyatt Farber Schreck and Diane Matsinger, Esq. discussed above. These letters are attached as part of Exhibit 21.

G. CALIFORNIA ENVIRONMENTAL QUALITY ACT

Pursuant to Public Resources Code Section 21067 and Sections 15050 and 15051 of Title 14 of the California Code of Regulations, the Santa Monica Mountains Conservancy/Mountains Recreation and Conservation Authority is the lead agency for CEQA purposes, as it is the public agency with principal responsibility for carrying out the Malibu Parks Public Access Enhancement Public Works Plan. As the lead agency under CEQA, the Santa Monica Mountains Conservancy/Mountains Recreation and Conservation Authority certified an EIR for this plan in August 2010 and approved as the PWP, the Environmentally Superior Alternative, which was the Modified Redesign Alternative.

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As an agency with a certified regulatory program under CEQA section 21080.5, the Commission must consider alternatives and mitigation measures that would substantially lessen any significant adverse environmental effects that the proposal would otherwise have on the environment. Sections 13371 and 13356(b)(2) of Title 14 of the California Code of Regulations require that the Commission not approve or adopt a PWPA unless it can find that: "...there are no feasible alternatives, or feasible mitigation measures, ...available which would substantially lessen any significant adverse impact that the development... may have on the environment".

The Commission has considered the Final EIR for the PWP as prepared by the Lead Agency. The Commission incorporates its findings on Coastal Act consistency at this point as if set forth in full. These findings address and respond to all public comments regarding potential significant adverse environmental effects of the project that were received prior to preparation of the staff report. For the reasons discussed in this report, the PWP, if modified as suggested, is consistent with Coastal Act requirements. As modified, the PWP will not have any significant environmental effects. Change or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effects as identified in the Final EIR. There are no other feasible alternatives or mitigation measures available that would further lessen any significant adverse effect that the approval would have on the environment. The Commission has suggested modifications to the PWP to include such feasible measures as will reduce the environmental impacts of new development. As discussed above, the Commission's suggested modifications bring the PWP into conformity with the Coastal Act, if amended in accordance with the suggested modifications. The Commission further finds that the PWP, if modified as suggested herein, is consistent with CEQA.

H. LIST OF EXHIBITS

- Exhibit 1 Regional Location Map**
- Exhibit 2 Public Parkland Map**
- Exhibit 3 Proposed Trail and Park Resources Map**
- Exhibit 4 Proposed Public Works Plan (PWP)**
- Exhibit 5 PWP Concept Plans**
- Exhibit 6 Biological Resource Maps**
- Exhibit 7 Relevant Public Access and Recreation Policies**
- Exhibit 8 Relevant ESHA and Water Quality Policies**
- Exhibit 9 Relevant Hazard Policies**
- Exhibit 10 Relevant New Development Policies**
- Exhibit 11 Relevant Visual Resource Policies**
- Exhibit 12 Relevant Archaeological Resource Policies**
- Exhibit 13 Santa Monica Mountains Conservancy Resolution 10-41 approving the PWP and authorizing submission to the California Coastal Commission**
- Exhibit 14 Mountains Recreation and Conservation Authority Resolution 10-109 approving the PWP and authorizing submission to the California Coastal Commission**
- Exhibit 15 Santa Monica Mountains Conservancy Letter, dated September 22, 2010, Requesting Minor Clean-up Changes**
- Exhibit 16 City of Malibu Consultation Letter, dated September 13, 2010**
- Exhibit 17 Los Angeles County Fire Department Letters, dated June 2, 2009 and April 21, 2010**

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Exhibit 18 Biological Concept Mitigation/Restoration Plan by Dudek, dated July 26, 2010

Exhibit 19 Fire Protection Plan by Dudek, dated August 2010

Exhibit 20 Ex Parte Communications

Exhibit 21 Correspondence Received

- **Donald Nierlich, Coastwalk California, dated October 6, 2010**
- **David Brown, Sierra Club, dated October 6, 2010**
- **Edith Morgan, Malibu Road resident, dated October 5, 2010**
- **Corral Canyon Fire Alliance, dated October 5, 2010**
- **Una Glass, Coastwalk California, dated October 11, 2010**
- **City of Malibu, dated October 7, 2010**
- **Santa Monica Mountains Conservancy, response to City of Malibu, dated October 11, 2010**
- **Brownstein, Hyatt, Farber, Schreck, dated October 11, 2010, with Errata dated October 12, 2010**
- **Santa Monica Mountains Conservancy, response to Brownstein et al, dated October 12, 2010**
- **Santa Monica Mountains Conservancy/Dudek, part 2 response to Brownstein et al, dated October 13, 2010**