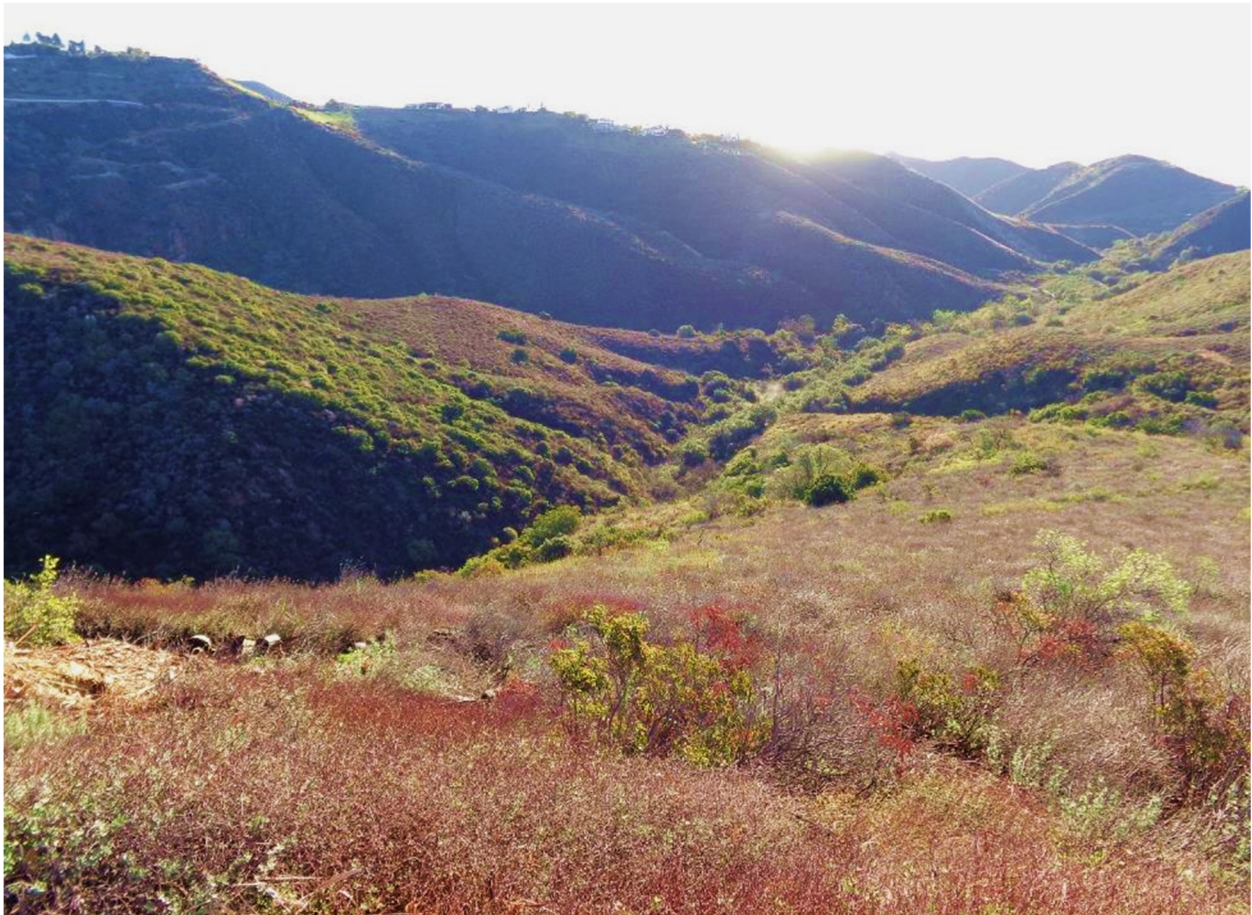




Draft Initial Study and Mitigated Negative Declaration Escondido Canyon Park to Murphy Way Connector Project

**CDP #16-074
MND #18-003**



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Mountains Recreation and
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Draft Initial Study, Environmental Checklist and Mitigated Negative Declaration

Escondido Canyon Park to Murphy Way Connector Project 5713 Murphy Way, Malibu, CA 90265

INTRODUCTION

This document is a tiered Initial Study/Mitigated Negative Declaration (IS/MND) to evaluate potential environmental effects resulting from implementation of the proposed Escondido Canyon Park to Murphy Way Connector Project (Project). The Project is subject to the guidelines and regulations of the California Environmental Quality Act (CEQA). Therefore, this document has been prepared in compliance with the relevant provisions of CEQA and the 2018 State CEQA Guidelines. As a tiered CEQA document, this IS/MND incorporates by reference the findings and mitigation measures of the Environmental Impact Report (EIR) prepared for the Malibu Parks Public Access Enhancement Plan–Public Works Plan (PWP). This IS/MND evaluates the potential direct, indirect, and cumulative environmental effects associated with the Project.

PURPOSE AND LEGAL AUTHORITY

Under CEQA (Public Resources Code Section 21000, et. Seq.) and the 2018 State CEQA Guidelines, the Mountains Recreation & Conservation Authority (MRCA), as Lead Agency, is required to analyze the potential environmental impacts of the Project.¹ Section 15152 of the State CEQA Guidelines allows the Lead Agency to “tier” the environmental analysis for separate but related projects. Per Section 15152(b) of the State CEQA Guidelines, tiering “can eliminate repetitive discussions of the same issues and focus the later EIR or negative declaration on the actual issues ripe for decision at each level of environmental review. Tiering is appropriate when the sequence of analysis is from an EIR prepared for a general plan, policy, or program to an EIR or negative declaration for another plan, policy, or program of lesser scope, or to a site-specific EIR or negative declaration.” Per Section 15152(d) of the State CEQA Guidelines, tiering “shall be limited to situations where the project is consistent with the general plan and zoning of the city or county in which the project is located, except that a project requiring a rezone to achieve or maintain conformity with a general plan may be subject to tiering.”

Section 15168 of the State CEQA Guidelines states that a Program EIR may be prepared when a series of actions that can be characterized as one Project and are related either: (1) geographically, (2) logical parts in the chain of contemplated actions, (3) in connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing

¹ Under Public Resources Code Section 21067, a Lead Agency is defined as a public agency which has the principal responsibility for carrying out or approving a project which may have a significant effect upon the environment. The MRCA is a local government public agency established in 1985 pursuant to the Joint Powers Act with authority to act as Lead Agency under CEQA.

program, or (4) as individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways.

The Santa Monica Mountains Conservancy (SMMC)/MRCA prepared a Program EIR (SCH # 2009091018) to evaluate the environmental impacts of implementing the Malibu Parks Public Access Enhancement Plan—Public Works Plan (PWP). The PWP identified three alternative trail alignments for the “Murphy Way Escondido Canyon Connector Trail (Escondido Canyon Park)”. Each of the three trail alignments descended the slope from Murphy Way (formerly De Butts Terrace) into Escondido Canyon Park, with all three alignments connecting to the existing Escondido Falls Trail. The trail connection named and evaluated as “trail alignment 4b” in the PWP is the most similar to the trail alignment analyzed further in this IS/MND. A Final EIR was certified by the MRCA on August 23, 2010 (Certified EIR).

Section 15168(c) of the State CEQA Guidelines allows subsequent activities identified in the Program EIR to be examined in light of the Program EIR to determine whether an additional environmental document must be prepared. Per Section 15168(c)(3), where “subsequent activities involve site specific operations, the agency should use a written checklist or similar device to document the evaluation of the site and the activity to determine whether the environmental effects of the operation were covered in the program EIR.”

This IS/MND has been prepared in accordance with Sections 15162 and 15168 of the State CEQA Guidelines. The final alignment of the Murphy Way Escondido Canyon Connector Trail identified in the PWP and evaluated in the Certified EIR (now titled the Escondido Canyon Park to Murphy Way Connector Project) is the subject of this IS/MND, which builds on the impact findings of the Certified EIR to further analyze the site-specific impacts of the final trail alignment. Where applicable, the analysis and mitigation measures identified in the Certified EIR are incorporated by reference into this IS/MND.

Based on the analysis presented in this IS/MND, the MRCA has determined there are no new significant impacts resulting from the final trail alignment after incorporation of mitigation, nor is there any substantial increase in the severity of any previously identified significant environmental impacts. In addition, the changes with respect to the trail alignment are within the scope of the project defined in the Certified EIR. As such, a tiered IS/MND is the appropriate environmental documentation for the Escondido Canyon Park to Murphy Way Connector Project.

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Appendix F: Traffic Study
Appendix G: Applicable Mitigations of the Prior Certified Environmental Impact Report

Mountains Recreation and Conservation Authority
Initial Study, Environmental Checklist

1. Project Title: Escondido Canyon Park to Murphy Way Connector Project
2. Project Location: 5713 Murphy Way
Malibu, CA 90265
3. Application: Coastal Development Permit No. 16-074
Variance No. 18-020
Sign Permit No. 18-006
Initial Study/Mitigated
Negative Declaration No. 18-003
4. Lead Agency Name and Address: Mountains Recreation and Conservation Authority
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Los Angeles, CA 90065
(323) 221-9944
5. Contact Person and Phone Number: Jessica Nguyen
Project Analyst
26800 Mulholland Highway
Calabasas, CA 91302
(310) 589-3230 ext. 125
6. Project Applicant Name and Address: Mountains Recreation and Conservation Authority
570 West Avenue 26, Suite 100
Los Angeles, CA 90065
(323) 221-9944
7. Property Owner: Mountains Recreation and Conservation Authority
570 West Avenue 26, Suite 100
Los Angeles, CA 90065
(323) 221-9944
8. Responsible Agencies: City of Malibu
23825 Stuart Ranch Road
Malibu, CA 90265
(310) 456-2486
8. General Plan and Local Coastal Program Land Use Designations: APN 4467-003-900: Rural Residential (RR10)
APN 4460-002-902: Public Open Space (POS)
9. Malibu Municipal Code Zoning and LCP Zoning: APN 4467-003-900: Rural Residential (RR10)
APN 4460-002-902: Public Open Space (POS)

10. Surrounding Land Uses and Setting:

North: Water tank owned by the County of Los Angeles Waterworks District No. 29 and undeveloped land within the unincorporated County of Los Angeles. Further north, undeveloped land of the Santa Monica Mountains National Recreation Area.

East: Public Open Space and the Escondido Canyon hiking trail within the City of Malibu.

South: Developed and undeveloped land designated for low-density single-family housing development within the City of Malibu.

West: Undeveloped land and low-density single-family housing within the City of Malibu. Further west, Ramirez Canyon Park, owned by the Santa Monica Mountains Conservancy and operated by the Mountains Recreation and Conservation Authority, property owned by the National Park Service.

1.0 Project Introduction

The Escondido Canyon Park to Murphy Way Connector Project (Project) would construct a 3,900-foot (0.74-mile) long multi-purpose trail within a portion of the Santa Monica Mountains National Recreation Area (SMMNRA), located entirely within the City of Malibu (City) and the Santa Monica Mountains Coastal Zone (Table 1). The proposed multi-use trail would connect Murphy Way to the west with the existing Escondido Falls Trail to the east, to provide additional access to Escondido Canyon Park. The entire segment of the proposed trail would be designed as a multi-use trail, 3 feet in width and with stability and grade sufficient to provide safe use for a variety of users, including walkers, hikers, bikers, and equestrians. The proposed trail's design, construction, and maintenance would be funded by the Santa Monica Mountains Conservancy (SMMC) and Mountains Recreation & Conservation Authority (MRCA).

Table 1: Project Summary

Project Feature/Action	Total
Finished Trail Length	3,900 feet (0.74 mile)
Finished Trail Tread Width	3 feet
Total Onsite Area	0.36 acre
Total Area of Disturbance ¹	0.54 acre
Estimated Total Cut and Fill	326 cubic yards (cy)
Estimated Net Export	290 cy

Notes: cy = cubic yard

¹ *Total Area of Disturbance includes total estimated area of construction ground disturbance, including area of erosion control features, sign installation, and estimated average width of construction work area along the trail (6 feet).*

On November 8, 2018, a destructive wildfire burned through 96,949 acres in the counties of Ventura and Los Angeles and much of the SMMNRA. The Woolsey Fire, which destroyed nearly 1,500 structures and damaged 341 structures, burned through the Project site and surrounding area before being successfully extinguished by fire crews on November 21, 2018. The following discussion of the proposed Project, existing physical site conditions, and potential impacts on the environment are based upon pre-fire conditions observed in spring-summer of 2018 and supplemented with details regarding post-fire conditions where appropriate. This approach is appropriate as the habitats affected by the fire are anticipated to generally return to pre-fire conditions within a relatively short time from (e.g., 5 years). Similarly, homes and structures affected by the fire are also anticipated to be repaired or rebuilt with a similar time frame. Therefore, the pre-fire description of the existing setting, as supplemented by post fire descriptions, remains an accurate description of existing conditions and the discussion below accurately describes conditions of the Project site.

2.0 Existing Conditions

2.1 Project Location and Existing Uses

The Project is located within the SMMNRA, a United States (U.S.) National Recreation Area and unit of the U.S. National Parks Service (NPS). The Project lies north (inland) of the Pacific Coast Highway (PCH) along the coastal foothills of the Santa Monica Mountains in the City, 1.3 miles inland from the coast of the Pacific Ocean and approximately 15.5 miles west of the City of Santa Monica along the PCH (Figure 1).

The proposed trail would traverse two parcels which are surrounded by undeveloped lands within the County of Los Angeles to the north and public park lands of Escondido Canyon Park and low-density single-family residential development to the east. To the south and west within the City lie both vacant and developed parcels designated for low-density single-family uses. Further to the west within Ramirez Canyon Park, several parcels are owned by both the SMMC and MRCA, and managed by the MRCA. NPS-managed park lands located within the vicinity of the Project include large portions of Ramirez Canyon to the west and Solstice Canyon to the east.

The SMMNRA encompasses approximately 156,671 acres of federal, state, county, city, and other local parklands and is jointly owned and managed by the NPS, the California Department of Parks and Recreation (CDPR), the MRCA, and the SMMC. The MRCA manages the park and recreation areas within the City of Malibu and the Santa Monica Mountains Coastal Zone that are owned by the MRCA and the SMMC.

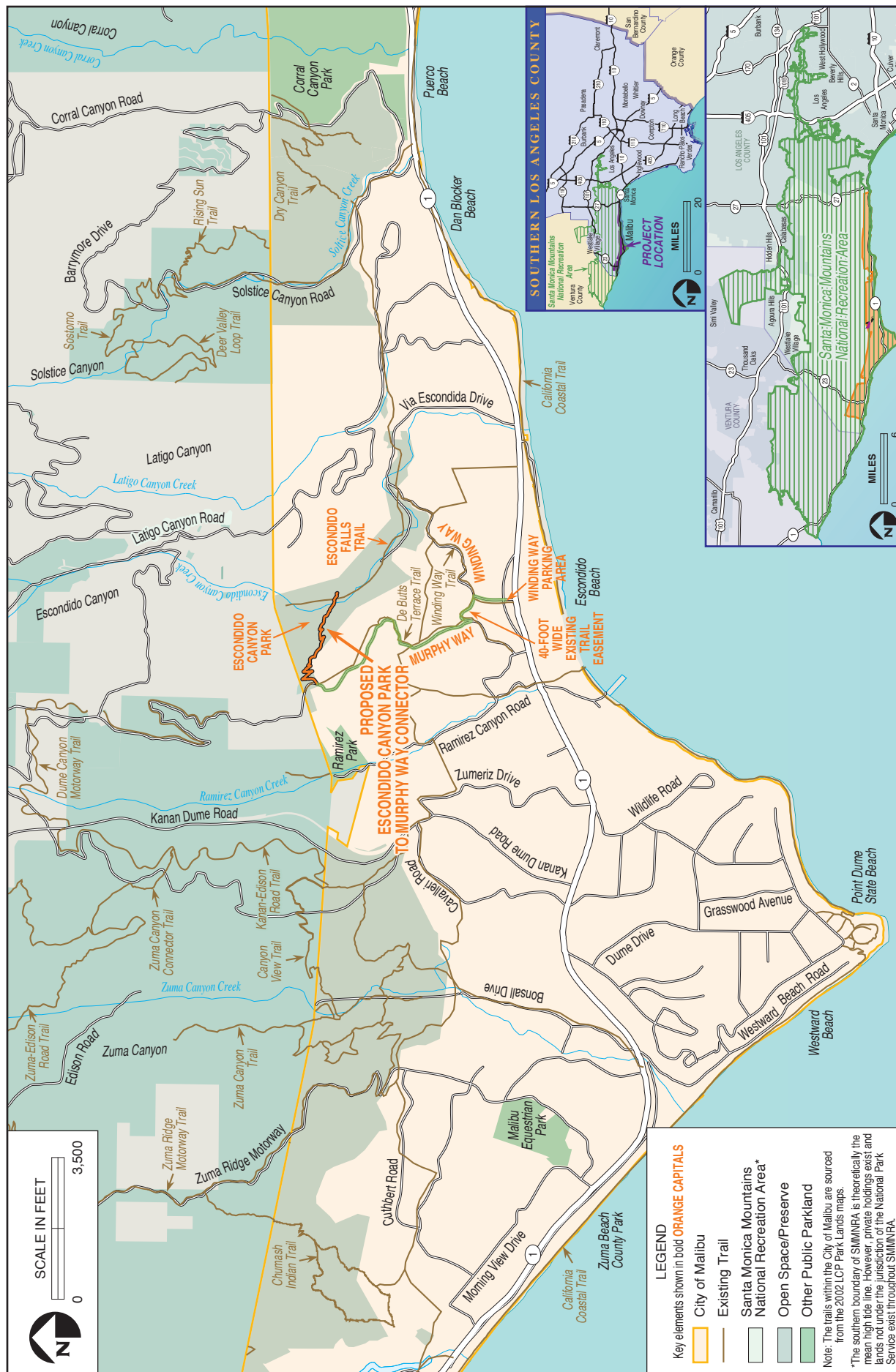


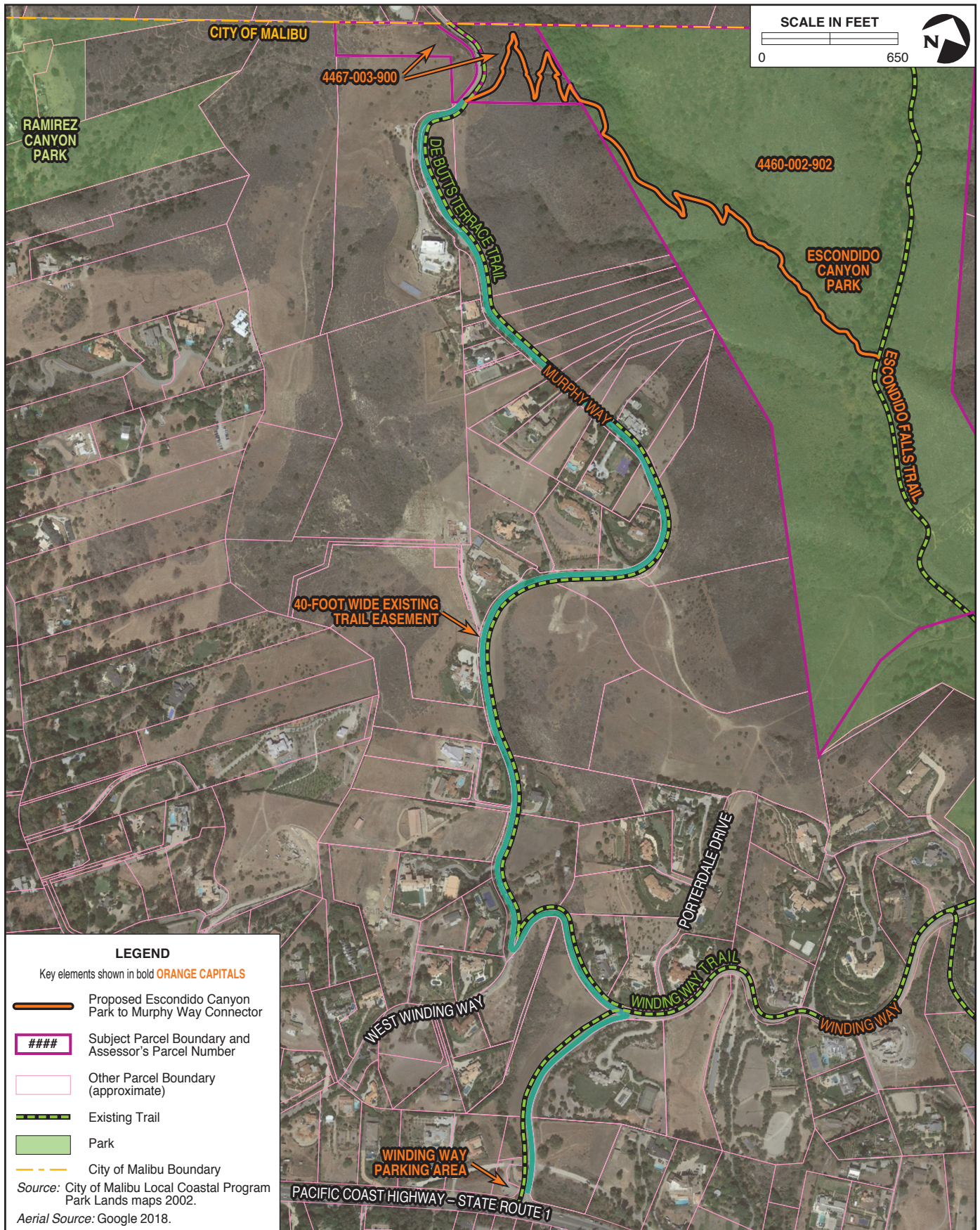
FIGURE 1

The SMMC is a state agency enacted in 1979 under Assembly Bill (AB) 1312 based on the recommendations of the Santa Monica Mountains Comprehensive Planning Commission, for the purpose of securing, preserving, and improving parkland in both wilderness and urban settings throughout Southern California. The MRCA, established in 1985, is a local public agency exercising joint powers of the SMMC, the Conejo Recreation and Park District, and the Rancho Simi Recreation and Park District pursuant to Section 6500 *et seq.* of the Government Code. The MRCA is dedicated to the preservation and management of local open space and parklands, watershed lands, trails, and wildlife habitat across more than 75,000 acres of public lands and parks in Southern California, particularly within Los Angeles County and Ventura County. The MRCA manages trails and recreational access and provides ranger services as well as comprehensive educational and interpretation programs for the public. In addition, the MRCA provides natural resource and scientific expertise, critical regional planning services, park construction services, park operations, and fire prevention services.

The proposed multi-use trail would traverse two contiguous MRCA-owned and managed parcels located along the northern boundary of the City. These parcels include a 5.99-acre parcel (Assessor's Parcel Number [APN] 4467-003-900) which is bisected by Murphy Way, and an 89.73-acre parcel (APN 4460-002-902) which encompasses the northern end of 140.8-acre Escondido Canyon Park and the popular Escondido Falls Trail (Figure 1). The 5.99-acre parcel spanning Murphy Way is currently undeveloped and designated as Rural Residential (RR10)—less than 1 dwelling unit per 10 acres—under the City General Plan and Local Coastal Program (LCP). The property is zoned Rural Residential (RR) under the Malibu Municipal Code (MMC) and LCP. The 89.73-acre parcel is designated as Public Open Space (POS) under the LCP and is similarly zoned Open Space (OS) under the MMC.

The proposed trail would link an existing public trail easement over Murphy Way held by the SMMC with the Escondido Falls Trail within Escondido Canyon Park. Murphy Way (previously named De Butts Terrace) is a paved road averaging 15 to 20 feet in width that provides access to adjacent residential development (Figure 2). Murphy Way is located within the 40-foot-wide public hiking and riding trail easement, also known as De Butts Terrace Trail, established over the road and unimproved road shoulders.

The existing Escondido Falls Trail is located within Escondido Canyon Park approximately one mile east of Kanan Dume Road and four miles west of Pepperdine University, entirely within the City limits. Escondido Canyon Park was acquired in parts by the MRCA and SMMC in the 1990s. The Escondido Falls Trail is the primary public trail within Escondido Canyon Park and allows for use by pedestrians, hikers, dogs (on-leash), bikers, and equestrians. The Escondido Falls Trail is located at the park entrance, which is connected to the mile-long Winding Way Trail located along Winding Way. The Winding Way Trail begins at the public parking lot located at the northwest corner of PCH and East Winding Way. The Winding Way parking lot is a paid public lot with a daily parking fee. From this parking lot, the southern 0.7-mile segment of the Winding Way Trail consists of an approximately 5-foot-wide improved trail located along the Winding Way road shoulder. A formal trailhead with signage is located approximately one mile up Winding Way from the parking lot, where the Winding Way Trail separates from the road and becomes a 3- to 5-foot-wide earthen multi-use trail leading onto the Escondido Falls Trail within the park.



Murphy Way Corridor

**FIGURE
2**



The 15- to 20-foot-wide Murphy Way provides access to low-density single-family residences in the Project vicinity, within the foothills of the Santa Monica Mountains; this road is located within an existing 40-foot-wide public trail easement (De Butts Terrace Trail) that allows for on-road or road shoulder public trail-related uses (e.g., hiking, biking, equestrian).

The Escondido Falls Trail initially descends downslope into Escondido Canyon, where the trail then gently climbs up the alignment of Escondido Creek for approximately 1.3 miles to the base of the Escondido Falls within Escondido Canyon Park. The existing Escondido Falls Trail is one of the most popular trails managed by the MRCA.

There are no structures located on the parcels that would be traversed by the proposed trail alignment. No existing structures or infrastructure (roads, utilities, existing trails, etc.) are proposed to be altered by the Project.

In November 2018, the Woolsey Fire burned through the entire Project site and much of the surrounding area, leaving the slopes of Escondido Canyon and its tributary canyons almost entirely bare of vegetation. In addition, the wildfire resulted in the destruction of four residential structures on Murphy Way near the proposed trail terminus, the destruction of Rancho Del Cielo at the northern terminus of Murphy Way near the proposed trailhead, and damaged at least three other residential structures on Murphy Way. Much of the vegetation along the road shoulders and side slopes east and west of Murphy Way was also burned. However, like all wildfire events, it is anticipated that these structures would be repaired or rebuilt, and vegetation would reestablish itself within the area over time.



Damage from the Woolsey Fire of November 2018 resulted in the burning of all vegetation within the Project site, Escondido Canyon Park, and much of the surrounding area. This includes damage to or loss of several residential structures as the wildfire spread down and in close proximity to Murphy Way from the Santa Monica Mountains towards the Pacific Ocean.

3.0 Project Description

The western terminus of the proposed trail alignment would be constructed from the east shoulder of Murphy Way. From there, the western 1,400 feet of the trail would traverse a series of five switchbacks descending a steep slope to a ridgeline that forms the northern slope of an unnamed tributary canyon to Escondido Creek. The central 1,400 feet of the trail would then follow this ridgeline before traversing four more switchbacks and steeper trail segments to the bottom of the unnamed intermittent tributary canyon. The eastern 1,000 feet of the trail would then parallel the tributary until the trail links with the existing Escondido Falls Trail in Escondido Canyon Park (Figure 3).



The proposed trail would link with the existing Escondido Falls Trail after crossing Escondido Creek (location of trail connection pictured).

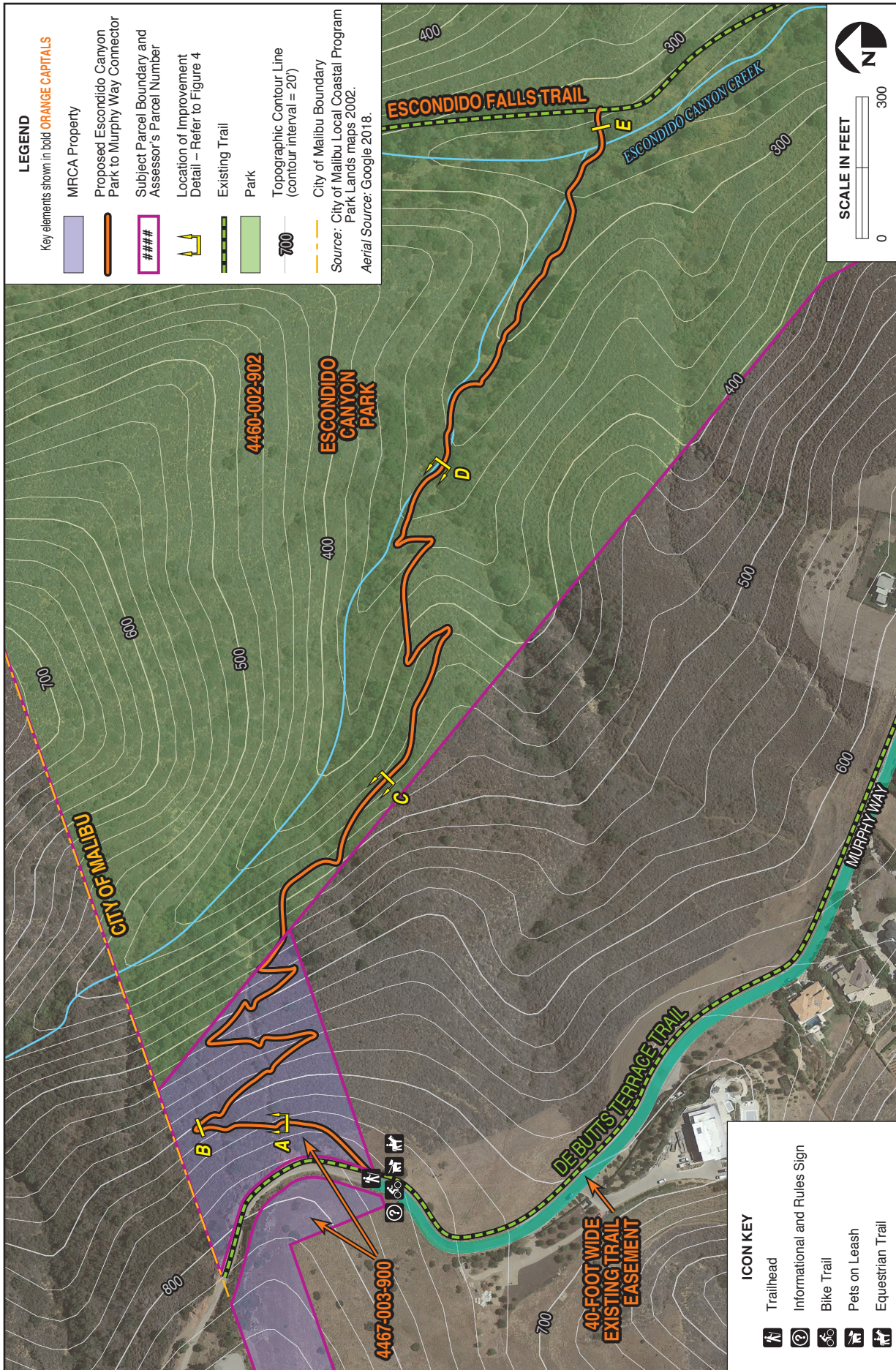


FIGURE 3

Project Site

Trail construction would occur within an average 6-foot-wide corridor to accommodate the installation of slope-stabilization and erosion-control features, including rock and timber walls (Figure 4). Trail construction would require approximately 326 cy of cut and fill and an estimated 290 cy of exported material within a roughly 0.54-acre corridor of ground-disturbing activity.² The final trail corridor, including slope protection features, would encompass an area of approximately 0.36 acre.

3.1 Proposed Trail Design

As mentioned above, the proposed trail's western and central sections would traverse a series of switchbacks and steeper trail segments, with a slope ranging from approximately 12 to 23 percent in grade. The proposed trail's eastern section would run along the bottom of the Escondido Creek tributary to the existing Escondido Falls Trail and would generally be more level, with a slope ranging from approximately 6 to 9 percent in grade. The proposed trail is anticipated to cross gullies on the upper slope near Murphy Way and the unnamed tributary at up to nine locations and cross Escondido Creek at one location.

Project implementation would include the installation of signs at the proposed trail's western terminus on Murphy Way. These informational signs would include a trail marking arrow, a hiker marker, MRCA rules and information such as prohibition of smoking, fires, and alcoholic beverages, as well as a dog leash requirement. In addition, "no parking" signs would be placed along Murphy Way and at the western terminus of the proposed trail on Murphy Way.

Trail Access and Use

Public access to the proposed trail would be provided by one of two options:

- Paid public parking would be available at the existing East Winding Way public parking lot and substantial areas for free parking is available along the PCH; no vehicle access or parking would be provided along Murphy Way and no further parking is proposed. Signs would be posted indicating no vehicle access for trail use is allowed and no parking signs would be posted, with enforcement by MRCA rangers.
- Trail users would proceed uphill north for approximately 1,050 feet (0.2 mile) on Winding Way to an unpaved connector road, then proceed approximately 900 feet west to Murphy Way; then,
- Trail users would proceed uphill north for roughly 5,000 feet (0.9 mile) to the new Escondido Canyon Park to Murphy Way Connector Trail; OR,
- Trail users would proceed uphill north and east along the existing Winding Way Trail for approximately 3,850 feet (0.7 mile) to Escondido Canyon Park; then,
- Trail users would proceed north along Escondido Falls Trail for approximately 3,500 feet (0.7 mile) to the new Escondido Canyon Park to Murphy Way Connector Trail.

² The proposed trail is based on high-resolution aerial photography and GPS data. As such, the final trail alignment may vary slightly from the alignment described throughout this IS/MND to allow for the recommendations of trail construction crews familiar with trail design guidelines. However, it is assumed the final alignment would not meaningfully deviate from the proposed alignment.

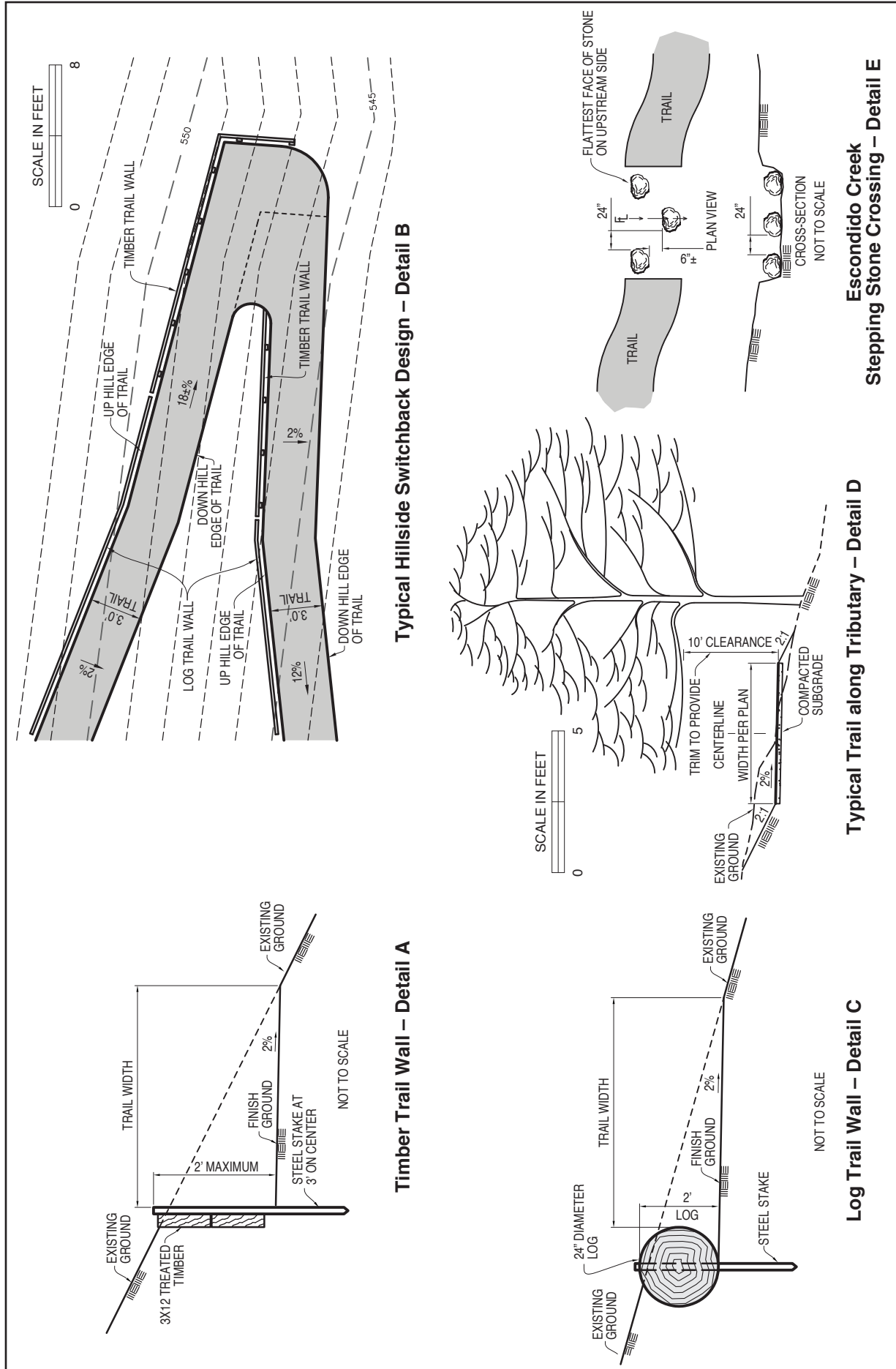


FIGURE 4

Proposed Trail Cross-Section and Typical Trail Features

Trail users would also have the option of doing an approximately 3.5-mile-long loop using the existing Winding Way Trail, Escondido Falls Trail, Escondido Canyon Park to Murphy Way Connector Trail, and the existing trail easement on Murphy Way. Future users of the proposed trail are anticipated to access the trail by both routes and may continue from either direction in a loop back to public parking areas located at the parking lot on Winding Way or along PCH. However, instead of completing the full loop, most users would likely proceed back along the trail because this route is shorter, less strenuous, and provides a more comfortable (e.g., shaded) experience than the exposed roadway. As such, the proposed trail is anticipated to provide an optional route or loop for the Escondido Falls Trail, but is not anticipated to substantially increase the use of or visitation to the Escondido Falls Trail or Escondido Canyon Park. Once completed, the proposed trail would be open for use seven days per week, 30 minutes before sunrise to 30 minutes after sunset.

Trail Construction

Project construction would require clearing of native vegetation and grading within an average trail corridor of 6 feet to allow for trail construction, including the installation of slope stabilization and erosion-control features adjacent to the proposed trail. Due to cost and time efficiency, small mechanized equipment and hand tools would be used to construct the trail. The small mechanized equipment would likely include a trail dozer, Bobcat® loader, and 4x4 all-terrain vehicle (ATV), while the hand tools would include shovels, pickaxes, mattocks, machetes, hand tampers, chain saws, loppers, wheel barrows, and other standard trail construction and maintenance equipment. This equipment would also be used for installation of wooden post mounted trail signs, which would be supported by concrete foundations installed to a depth of 2.5 feet below ground surface.

A trail dozer or Bobcat® loader would be used to make the initial trail cut along the identified route to cut and fill soil that would be used to fill in specific trail sections. In areas of heavy vegetation, a masticator or flail mower attached to the front of the trail dozer or Bobcat® loader would first clear the route. Chain saws and machetes may also be used to clear vegetation where sensitive biological resources are present. Hand tools would be used to establish erosion control step overs, rolling grade dips, and water diversions, and to help with installation of slope stabilization structures. Another pass of the trail would be made by the trail dozer or Bobcat® loader to groom the upslope and downslope transitions of the trail along the switchbacks. A roller would then be pulled along the trail by a 4x4 ATV or dozer to help compact soils to reduce erosion and dust until full compaction of the trail by users or rainfall would occur.³ A portion of the excess soil and rock would be used to repair areas of erosion in the vicinity of the trail and to stabilize slopes along the trail. The estimated net excess 290 cy of cut soil and rock from trail construction would be exported off-site to the Calabasas Landfill located in the City of Agoura Hills, approximately 16 miles from the Project. Small rubber-tired or tracked equipment would be



A trail dozer or Bobcat loader would be used to make an initial trail cut due to their small size, maneuverability, and ability to avoid native habitat and biological resources.

³ Full compaction of the trail would not occur until disturbed soils could be watered, either by seasonal rainfall or by water imported to the site via truck.

used to haul net excess soil and rock out of the work area and into haul trucks for shipment to the landfill.

Where the proposed trail crosses gullies and drainages such as Escondido Creek and the unnamed tributary, stepping stones would be placed across the low-flow channel to permit dry crossings and water passage. Up to eight stepping stones would be embedded within each channel to provide a level and stable stepping platform. Stones would be placed to minimize impacts to surrounding vegetation (Figure 4). Each stone would be embedded approximately one foot into the streambed, with the most angular face of each stone facing downstream and/or parallel to the stream flow. Approximately 42 square feet of Escondido Creek and 102 square feet of the intermittent tributaries would be affected by the stepping stones. The proposed stepping stones may occasionally require replacement following heavy storm events.

Construction of the proposed trail would require disturbance and removal of native vegetation, and the potential trimming of mature trees to provide a minimum 10 feet of vertical clearance for equestrians (Figure 4). No protected native trees or mature trees would be removed. Several best management practices (BMPs) would be employed during trail construction to reduce or avoid removal or loss of vegetation and tree specimens or avoid the spread of nonnative invasive plant species. These measures include but are not limited to the following:

- Highly invasive species shall be removed before, where possible, and during stone placement activities. If thistle or castor bean are in seed, the seeds shall be removed first and bagged, and then the remainder of the plant. Seeds that have fallen on the ground shall also be collected and bagged.
- Care shall be taken to thoroughly clean all tools, equipment, and clothing of personnel working in these areas to avoid carrying propagules (seeds, stem pieces) of these weeds into undisturbed scrub and woodland habitats. All plant parts and seeds shall be taken to an appropriate landfill site.

Construction methods for slope protection walls would vary depending on the steepness of grade. The final type and length of slope protection and retaining wall structures would be determined during construction of the proposed trail. Generally, where slope protection walls would be less than two feet in height, they would be constructed of treated timbers, and those of 2 to 3 feet in height would be constructed of stacked rocks. Based on initial grading plans and slope profiles, slope protection walls would be constructed along approximately 560 linear feet of the trail (less than 15 percent of trail length). No slope protection wall would exceed three feet in height. At the trail's nine switchbacks, railroad tie steps anchored with rebar would be utilized to protect the trail's slope, and railroad tie steps would be installed in areas of steeper grade.

To minimize runoff and erosion during construction, temporary silt fencing would be installed along the trail corridor where sheet flows could occur downhill from construction areas.⁴ To minimize erosion following construction, permanent rolling grade dips and biodegradable sediment control features (coir rolls) would be constructed along the entire length of the proposed trail at intervals of approximately 200 feet. These features would be constructed perpendicular to the trail such that the top of the coir roll is at a constant elevation and secured in place. Half of the diameter of the coir roll would be embedded into the trail and secured with steel pins and washers.

⁴ Silt fencing would be installed to limit the size of the drainage area to no more than 0.25 acre per 100 linear feet of the silt fence, so the maximum flow path length above the barrier is 100 feet and the maximum flow gradient ratio above the barrier is 2:1.

All construction equipment and materials used for trail construction would be transported from off-site staging areas located at the Winding Way public parking lot and along the road shoulders of Murphy Way and Winding Way where safely feasible. No overnight storage of equipment or materials would occur along road shoulders. No source of stone material is located within the proposed trail corridor, and all construction materials would be imported from off-site. To support construction of slope-stabilization and erosion-control features, it is estimated that the Project would require 36 – 4-foot-long railroad ties for steps, 40 – 3-inch x 12-inch x 10-foot timber boards for retaining walls, 90 tons of 14-inch diameter rocks for retaining walls, 10 tons of 16-inch dimension rocks for stepping stones, 2 cy of riprap stones for rolling grade dips, and additional materials required for construction support such as steel stakes for the timber walls, rebar for the railroad tie steps, and the erosion control materials. Materials would be delivered to the Winding Way public parking lot staging area, requiring approximately 8 truck trips by 10-cy haul trucks for the rock material, 3 flatbed truck trips for the timber materials, and 10 pickup truck trips for miscellaneous support and erosion control materials. Additional truck trips are required to transport materials, equipment, and tools to the work area. Construction materials and equipment would then be transported to the trailhead and conveyed along the proposed trail with small mechanized equipment (e.g., trail dozer, Bobcat® loader, 4x4 ATV), or manually with wheelbarrows.

Trail construction is proposed to be accomplished by a 6- to 10-person work crew consisting of MRCA employees and potentially supplemented by volunteers. Overall construction duration would be subject to environmental factors and working conditions (e.g., weather events, fire hazard conditions). Given the length of the proposed trail and conditions present at the site (e.g., steep slopes, vegetation cover), Project construction is anticipated to occur over a period of 5 to 7 weeks. All noise-generating construction activities would be limited to the hours of 7:00 A.M. to 5:00 P.M., Monday through Friday, and construction equipment maintenance would be limited to the same hours. Stationary construction equipment which generates noise in excess of 65 decibel average (dBA) at the project boundaries would be shielded and located at a minimum of 50 feet from occupied residences (the nearest residence is located approximately 680 feet from proposed activities). Further, the majority of vegetation debris generated from trail construction would be placed near the trail corridor to help stabilize slopes and minimize erosion.

Trail Maintenance and Enforcement

Trail maintenance would occur during both regular maintenance and periodic repairs to damaged trail segments and trailheads as needed. MRCA rangers and park maintenance staff would identify any areas of maintenance deficiency. This information could then be used to modify the maintenance schedule for the proposed trail to redirect efforts or apply more work hours. During trail maintenance and repair, trail crews would typically perform ongoing maintenance using hand tools or power equipment such as chainsaws and weed whackers to keep vegetation overgrowth and fallen trees from obstructing the trail. No herbicides would be used for vegetation management on trails and no mules would be used for routine maintenance activities. Mules may be used in cases where major repairs are needed for major trail failures. In addition, to repair major erosion or damage, mechanized equipment such as trail dozers, Bobcat® loaders, or 4x4 ATVs may be used.

The MRCA would be responsible for all trail maintenance activities for the proposed trail. Trail maintenance would be performed by experienced trail crews, potentially supplemented by volunteers. Work would be performed during daytime hours or between 7:00 A.M. to 5:00 P.M. This IS/MND estimates that Park Rangers would patrol the proposed trail alignment based on current patrol schedules and calls for service. In emergency situations such as wildfires or lost individuals, work by MRCA employees after these hours may be required. Larger maintenance

activities and repairs such as fire clearance work may be subcontracted to private competitive contractors approved by the MRCA.

The MRCA currently employs park rangers, who are sworn California Peace Officers with the authority to issue citations and make arrests. MRCA park rangers enforce the MRCA Park Ordinance along with other State and local laws. Park rangers patrol park facilities based on needs, season, weather, fire danger, and calls for service. MRCA park maintenance employees have scheduled route service that provides for increased public use over weekends. Currently the MRCA has resident park rangers living at King Gillette Ranch and Charmlee Wilderness Park. MRCA maintenance personnel and the MRCA's fire division are also based at King Gillette Ranch. Additionally, a resident member of the MRCA fire division currently lives in MRCA parkland in Carbon Canyon (Mellone Trailhead). A combination of MRCA ranger, maintenance, and fire division staff would provide enforcement, patrol, and maintenance for the proposed trail.

Following initial completion and operation of the trail, MRCA proposes to frequently notify/remind users via social media of parking and vehicle restrictions along Murphy Way. Park Rangers will conduct patrols along Murphy Way to enforce such parking restrictions and discourage future violations.

In addition to security and public safety responsibilities, MRCA ranger/maintenance staff are responsible for the overall maintenance (including trash/litter disposal, graffiti removal) and inspection of trails and trail conditions. In addition to park rangers and maintenance staff, the MRCA also employs full-time, paid call, volunteer, and cadet trained wildland fire fighters certified to the same standards as the U.S. Forest Service and the California Department of Forestry and Fire Protection (CAL FIRE). The MRCA deploys its own fire-fighting equipment, including four-wheel-drive Type 3 fire engines, Type 1 tactical water tenders, mobile command units, crew busses, and Type 4 fire patrol vehicles equipped with a minimum of 200 gallons of water. Wildland firefighters assess each park property and trail for fire risks and hazards. MRCA wildland fire staff maintain constant communication with local jurisdictions, including California State Parks and NPS, to promote cooperative efforts to prevent and defend against wildfire (MRCA 2018).

Annual fuel modification would not be required for the proposed Project. However, fuel loading would be managed along the trail alignment as part of routine regular maintenance. MRCA staff would inspect the trail annually following the natural drying of grasses and fine fuels, between the months of April and June. Dead and dying materials would be removed from the trail alignment and plants that establish or are introduced to the trail alignment that are not on the approved plant list would be periodically removed. In addition, brush would be periodically cleared along the trail corridor.

3.2 Project Best Management Practices and Design Measures

In addition to those listed for management of vegetation and weed species above, the Project would include the following BMPs and implementation measures during Project construction and operation which would serve to reduce adverse effects from construction of the trail:

- Installation of erosion control measures, including:
 - a. Construction of silt fencing to control erosion and runoff on the downslope portions of the trail to protect adjacent properties or waters of the United States, such that:
 - i. the size of the drainage is no more than 0.25-acre per 100 linear feet of silt fence,

- ii. the maximum flow path length above the barrier is 100 feet, and
 - iii. the maximum flow gradient above the barrier is 2:1.
- b. Construction of erosion control blanket over cut slopes.
- c. Scatter of native seed mix of soil prior to installation of erosion control blanket.
- d. Construct rolling grade dips and biodegradable sediment control coir rolls at approximately 200-foot intervals along the trail, approximately perpendicular to the trail.
- e. Scatter native seed mix to the disturbed area at the conclusion of grading operations.
- Preservation of existing vegetation to the extent feasible that is adjacent to the area to be graded.
- Stone placement activities shall take place only in the dry season between July 1 and September 30.
- The proposed stepping stones shall be strategically placed in a manner that will avoid native vegetation removal to the maximum extent feasible. If native vegetation removal cannot be avoided, the stepping stones shall be placed in a manner that will minimize native vegetation removal to the maximum extent feasible.
- The proposed stepping stones shall be secured into place using in-situ sediment that shall be compacted around each stone in a manner that will minimize suspension of sediment during flow events.
- The proposed stepping stones shall be sited so that protected trees are not removed and that encroachment and removal of major limbs is reduced to the practicable extent possible.

3.3 Project Objectives

Section 15124(b) of the California Environmental Quality Act (CEQA) Guidelines requires a statement of a Project's objectives and that the statement of objectives includes the underlying purpose of the Project. The underlying purpose of the Project is to provide secondary access into Escondido Canyon Park and the existing Escondido Falls Trail from Murphy Way. Major objectives of the Project include:

- Balance the needs and concerns of private residents adjacent to public recreational lands and primary recreational access routes with the need to promote and enhance public access and recreation opportunities in the Santa Monica Mountains Coastal Zone for all visitors and user groups.
- Construct a critical section of a continuous inland public access trail system that provides unique and spectacular views of the coast and ocean and, wherever feasible, complete linkages for connector trails to access the coastal mountains and 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."
- Disperse usage impacts on the Winding Way Trail and Escondido Canyon Park by providing an alternate route to the heavily used Winding Way Trail.

3.4 Project Review and Approval

The Project would overlap the appeals jurisdiction of the California Coastal Commission (CCC) as depicted on the City LCP Post-Certification Permit and Appeal Jurisdiction Map. The Project is therefore subject to CCC appeal pursuant to Public Resources Code (PRC) Section 30603 and subject to the policies and regulations of the City LCP. Given the Project would involve development of lands within the jurisdiction of the City, the Project is subject to the policies and regulations of the City's MMC and General Plan, along with additional City permitting requirements. Approvals and permits required to implement the Project may include:

- City review and approval of a Coastal Development Permit (or CCC review and approval of a Coastal Development Permit on appeal);
- City review and approval of a variance for construction of the trail on slopes steeper than 2.5 to 1; and
- City review and approval of a sign permit for the installation of parking signs and informational and directional trail signs.

In advance of the CEQA process, on May 10, 2017, MRCA submitted an application with Project design plans to CDFW for a lake and streambed alternation agreement (Fish and Game Code Section 1602). On July 12, 2017, CDFW responded to MRCA's application with a Final Determination authorizing MRCA to proceed with the Project without the need for an agreement. No further agency permits are anticipated to be required for the Project.

4.0 Potentially Significant Effects Checklist

The following checklist indicates the potential level of impact and is defined as follows:

Potentially Significant Impact: A fair argument can be made, based on the substantial evidence in the file, that an effect may be significant.

Less Than Significant Impact with Mitigation: Incorporation of mitigation measures has reduced an effect from a Potentially Significant Impact to a Less Than Significant Impact.

Less Than Significant Impact: An impact is considered adverse but does not trigger a significance threshold.

No Impact: There is adequate support that the referenced information sources show that the impact simply does not apply to the subject project.

Reviewed Under Previous Document: The analysis contained in a previously adopted/certified environmental document addresses this issue adequately for use in the current case and is summarized in the discussion below. The discussion should include reference to the previous documents, a citation of the page(s) where the information is found, and identification of mitigation measures incorporated from the previous documents.

4.1 Aesthetics/Visual Resources

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Existing Setting

Important visual resources are those that are visible from public areas such as highways, public beaches, vista points, hiking trails, parks, and scenic roads designated under the City's LCP. Scenic resources in the City include views of the Pacific Ocean, Santa Monica Mountains, trees, and vegetation. The Malibu coastline offers consistent ocean views and associated scenic vistas from PCH and local roads. Panoramic vistas of both steep canyon slopes and ridgelines covered with native vegetation and the Pacific Ocean are available from multiple public viewing points. Significant ridgelines are located throughout Malibu and the Santa Monica Mountains and are defined as those ridgelines that silhouette the sky or the ocean, and are clearly visible from public roads (City of Malibu 1995).

Many roads in the City provide scenic views, but only PCH has been officially designated as an eligible scenic highway (California Department of Transportation 2011). The proposed trail alignment is not within an identified scenic vista in the City's General Plan or LCP, and is generally not visible from PCH or nearby public beach areas. The proposed trail alignment is visible from a limited number of public vantage points, including from Murphy Way to the west. Views from Escondido Canyon Park to the east are mostly obstructed by vegetation. Distant views, often through mature trees, across the trail alignment are of the Santa Monica Mountains, steep slopes, ridgelines, and open sky above. Rural residential homes also line the ridgeline atop Murphy Way. Views of and across the trail alignment from Murphy Way are of the Pacific Ocean, ridgelines, and panoramic vistas of both steep canyon slopes covered with native vegetation and limited development. Zuma Canyon, Solstice Canyon, and Castro Crest are other notable viewing locations that are proximate to the proposed trail area, however the proposed trail corridor is not visible from these areas.

Views of these features also define the visual character of the Project vicinity. Development is limited to a rural community of residential homes and paved residential roads often along ridgelines, such as Murphy Way. The Project vicinity also supports views of undeveloped canyons, native oak and riparian woodlands, and coastal sage scrub habitats interspersed among areas of grassland and landscaping surrounding homes. While the majority of these habitats burned in the recent Woolsey Fire, such habitats are adapted to fire and relatively rapid regrowth

over the next 5 years is anticipated. In the interim, the area is currently characterized by burned vegetation, bare or blackened slopes, and with damaged or burned structures visible.

The proposed trail corridor does not contain any designated historic buildings or rock outcroppings, such as those present further east in the Santa Monica Mountains. The corridor is not visible from a state scenic highway.

The proposed trail alignment is located within the central southern extent of SMMNRA, along a steep hillside, ridgeline, and canyon bottom. The proposed alignment supports no sources of light or glare that affect day or nighttime views in the area, although nearby single-family homes have night lighting.

Impact Discussion

The Certified EIR concluded that potential impacts to scenic vistas and change in visual character due to Escondido Canyon Park and trail connection improvements would be less than significant.

a & b. Less than Significant. Depending on the timing of construction, the Project would include clearing of vegetation and/ or grading of burned over soils within an average trail corridor of 6 feet to allow for trail construction. Project components would not be visible from PCH, a designated scenic highway. However, trail segments on the steep hillside and ridgeline would be visible from Murphy Way, with more distant occasional views through trees from Escondido Canyon Park. Over the long-term where visible, the trail would appear as a narrow, winding path through the native vegetation of the canyon. The trail has been designed to maintain topography and vegetation along the proposed alignment, requiring the installation of only minor slope stabilization and erosion-control features. All mature trees in the canyon bottom would be retained. Thus, where visible, the trail would be a subordinate feature of the visual landscape. The proposed trail would not obstruct or adversely affect scenic vistas, such as those of the Pacific Ocean. Rather, the upper segment of the proposed trail would introduce a new public viewing point of scenic vistas, including panoramic views of the Pacific Ocean, coastline, and Santa Monica Mountains. No scenic resources or scenic vistas would be substantially affected by the Project. Therefore, implementation of the Project would result in a *less than significant* impact.

c. Less than Significant. The Project would alter the existing visual character of the project vicinity by introducing a narrow winding path to an undisturbed tributary canyon, but would not substantially degrade the existing visual character or quality of the project site and its surroundings. The change in visual character would occur in two parts: (1) short-term exposure of soils during grading/construction and storage of equipment onsite during construction, and (2) an overall change from an undisturbed tributary canyon to a narrow recreational trail. Depending on the time of construction, grading of burned over soils would leave a more visible scar over the short-term until vegetation begins regrowth in the first 1-2 years. The total area of disturbance would include roughly 0.54 acre along the proposed trail corridor.

Construction

Project construction is anticipated to occur over a period of 5 to 7 weeks. Short-term construction effects that could be considered obtrusive or out of character with the area include the presence of construction equipment and stockpiled materials. During construction, motorists and pedestrians along Murphy Way and/or trail users within Escondido Canyon Park could potentially view the proposed trail area, including grading activities against the slope. Views could include exposed dirt, construction equipment, construction material laydown areas, and staging areas. While this impact could be adverse, it would be short-term and temporary, involve limited

disturbed areas, and would be seen by a limited number of viewers from public viewing locations; thus, impacts would be *less than significant*, and no mitigation is recommended.

Operation

The proposed trail would be consistent with the existing visual character of the area. Trail improvements would use similar materials as surrounding recreational areas (e.g., rock and timber walls, earthen toned stones, regulatory signs) and would be lower in profile than nearby residential homes. Project implementation would not substantially affect the natural and rural open space character of the Project vicinity. Where visible, the trail would be a subordinate feature of the visual landscape, being set into the existing topography to the extent practicable and requiring the installation of only minor slope stabilization and erosion-control features. Further, even after the first 1-2 years of regrowth of burned vegetation, the trail alignment would be surrounded by dense native vegetation and would retain all mature trees. The Project would alter the visual appearance of the project site, but the trail would be a subordinate feature designed with materials that complements the existing visual character of the Project vicinity. The proposed trail alignment would not substantially degrade the visual character or quality of the site or introduce any aesthetic elements incompatible with the surrounding land uses. Therefore, the existing visual character would be maintained, and implementation of the Project would result in a *less than significant* impact.

d. No Impact. The Project does not include the construction of structures or additional sources of lighting. Project construction would not produce a significant source of lighting or glare, and operation of the trail would limit use to daytime hours (30 minutes before sunrise to 30 minutes after sunset). Light may be generated from the vehicles of trail users nearing the sunset hours of the day, but these sources of light would be limited to the public parking lot on Winding Way and public parking on PCH and would not generate a significant amount of light or glare. Therefore, the Project would not generate glare or substantial night lighting, and the Project would have *no impact*.

Required Mitigation Measures

The Certified EIR identified no required mitigation measures (MMs) for implementation of trail alignment 4b. No significant impacts have been identified for the final trail alignment proposed under the Project. Therefore, no mitigation is required.

Residual Impacts

Residual impacts to aesthetic and visual resources would remain *less than significant*.

4.2 Agricultural and Forestry Resources

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997), prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.				
Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Existing Setting

The California Department of Conservation lists Prime Farmland, Unique Farmland, and Farmland of Statewide Importance under the general category of "Important Farmland." According to the Farmland Mapping and Monitoring Program, the proposed trail alignment and surrounding vicinity is classified as Other Land (Department of Conservation 2016). The Project vicinity is not zoned for agricultural use and/or under a Williamson contract, and is zoned by the City for Rural Residential (RR) and Public Open Space (POS). The proposed trail is not located near or within an area that is zoned for timberland production (as defined by PRC section 4526).

Impact Discussion

The Certified EIR concluded that all of the parks and associated trail and other facility improvement sites would not occur on or adjacent to lands that support agricultural activities or

that are designated for agricultural use. Therefore, potential impacts related to agricultural resources would be less than significant.

a, b, c, d, & e. No Impact. No changes have occurred to the existing setting that would affect this impact finding. The proposed trail alignment and surrounding vicinity is not zoned for agricultural use and/or under a Williamson contract. The Project would not convert farmland to nonagricultural uses. Further, the Project vicinity is not located near or within an area that is zoned for timberland production. *No impacts* would occur.

Required Mitigation Measures

The Certified EIR identified no required MMs for implementation of trail alignment 4b. No significant impacts have been identified for the final trail alignment proposed under the Project. Therefore, mitigation is not necessary.

Residual Impacts

Implementation of the Project would result in *no impact* with regard to agricultural and forestry resources.

4.3 Air Quality

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.				
Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Existing Setting

To protect the public health and welfare, the federal and state governments have identified six criteria air pollutants and a range of air toxics, and established ambient air quality standards through the federal Clean Air Act and the California Clean Air Act. Federal and state criteria air pollutants include carbon monoxide (CO), lead (Pb), nitrogen oxides (NO_x), ozone (O₃), particulate matter less than 10 microns in diameter (PM₁₀), fine particulate matter less than 2.5 microns in diameter (PM_{2.5}), and sulfur dioxide (SO₂).

The Project is located in the South Coast Air Basin (Basin), which covers the non-desert portions of Los Angeles, San Bernardino, and Riverside Counties, as well as Orange County. The South Coast Air Quality Management District (SCAQMD) monitors and regulates the local air quality in the Basin and manages the Air Quality Management Plan (AQMP). The SCAQMD has divided the region into 38 source receptor areas (SRAs) in which 32 monitoring stations operate. The project site is located within SRA 2, which covers the western Santa Monica Mountains and Malibu area. Section 5.3.2 of the AQMP identifies the SCAQMD ambient air quality standards for relevant air pollutants.

The proposed trail alignment traverses undeveloped open space, which is not associated with any air pollutant emissions. The surrounding vicinity includes single-family rural homes, Escondido Canyon Park and Escondido Falls Trail, Rancho del Cielo (a wedding venue located on Murphy Way north of the proposed beginning of the trail connection; 5591 Murphy Way; destroyed in the November 2018 Woolsey Fire), and undeveloped open space. The closest sensitive receptors to air quality emissions are the single-family rural homes along Murphy Way, the nearest of which is located approximately 680 feet downslope and south of the western trail terminus. Although the fire largely burned existing vegetation and exposed bare soils, vegetative regrowth is anticipated to cover most bare soils within 1-2 years.

Emissions Thresholds

Air quality impacts are assessed by comparing impacts to baseline air quality levels and applicable ambient air quality standards. Federal and state air quality standards have been established for criteria air pollutants. Standards are levels of air quality considered safe from a regulatory perspective, including an adequate margin of safety, to protect public health and welfare.

Regional Construction Emissions

The SCAQMD currently recommends that projects with construction emissions that exceed any of the following emissions thresholds should be considered potentially significant.

- 75 pounds per day (lbs/day) of volatile organic compounds (VOC)
- 100 lbs/day of NO_x
- 150 lbs/day of PM₁₀
- 55 lbs/day of PM_{2.5}

Localized Construction Emissions

Localized significance thresholds (LSTs) were developed in response to the SCAQMD Governing Board's Environmental Justice Enhancement Initiative (I-4). LSTs represent the maximum emissions from a project that will not cause or contribute to an air quality exceedance of the most stringent applicable federal or state ambient air quality standard, taking into consideration ambient concentrations in each SRA, project size, and distance to the sensitive receptor, etc. LSTs are only applicable for emissions of CO, NO_x, PM₁₀, and PM_{2.5}. LSTs do not apply to emissions from mobile sources such as automobile traffic or public transport (SCAQMD 2014).

SCAQMD's LST Methodology includes screening tables that can be used for projects less than 5 acres in size to determine the maximum allowable daily emissions that would satisfy the LSTs (e.g., not cause an exceedance of the applicable concentration limits). SCAQMD provides lookup tables for project sites that are one, two, or five acres. The allowable emission rates depend on (1) the SRA in which the project is located, (2) the size of the project site, and (3) the distance between the project site and the nearest sensitive receptor. For this Project, which comprises approximately 0.54 acre and is located approximately 680 feet (207 meters) from the nearest sensitive receptor within SRA 2, the conservative project site area of 1 acre at 25 meters was utilized for this analysis. The following allowable emission thresholds are estimated for construction LSTs from this Project:

- 562 lbs/day of CO
- 103 lbs/day of NO_x
- 4 lbs/day of PM₁₀
- 3 lbs/day of PM_{2.5}

Regional Operational Emissions

The SCAQMD currently recommends that projects with operational emissions that exceed any of the following emissions thresholds should be considered potentially significant.

- 550 lbs/day of CO
- 55 lbs/day of VOC

- 55 lbs/day of NO_x
- 150 lbs/day of SO_x
- 150 lbs/day of PM₁₀
- 55 lbs/day of PM_{2.5}

Impact Discussion

The Certified EIR estimated that construction of improvements at Escondido Canyon Park, including the installation of trail segment 4b, would result in an estimated maximum daily emission of 9.98 pounds (lbs) of VOC, 65.98 lbs of NO_x, 41.56 lbs of CO, 0.01 lbs of SO₂, 5.95 lbs of PM₁₀, and 4.18 lbs of PM_{2.5}.

With regard to regional emissions thresholds, the Certified EIR found that the construction of the proposed improvements at each individual location (Escondido Canyon Park was one of eight identified locations) would not exceed regional emissions thresholds. However, the Certified EIR conservatively found that if the proposed improvements at all eight locations were constructed simultaneously, the total construction emissions would exceed regional emissions thresholds for NO_x. Thus, impacts were determined to be potentially significant. MMs AQ-1.1 through AQ-1.3 — requiring that park improvement components be implemented one-at-a-time, outlined restrictions on size and number of construction equipment, and required compliance with SCAQMD Rule 403 — were identified to reduce impacts to a *less than significant* level.

With regard to localized emissions thresholds, the Certified EIR did not consider simultaneous construction of the proposed improvements at all eight locations because localized thresholds are meant to analyze local air quality impacts. The construction of improvements proposed at Escondido Canyon Park in the Certified EIR were determined to exceed the most stringent LSTs for PM₁₀ and PM_{2.5}, resulting in a potentially significant impact. MM AQ-2, which would prohibit construction activities within 50 meters (150 feet) of sensitive receptors or require installation of diesel particulate filters on equipment would reduce impacts to a *less than significant* level.

Air quality emissions associated with operation of all proposed improvements in the Certified EIR, generation of odors, potential for the generation of a CO “hot spot,” and potential to conflict with or obstruct the AQMP for the Basin were determined to be *less than significant*.

a. Less than Significant with Mitigation Incorporated. The Project would not result in significant population or employment growth, or increase currently established regional population projections. Even despite post-fire conditions and the increased potential for generation of fugitive dust caused by disturbance of burned, blackened, or scarred soils, given the limited extent of grading, trail construction is not anticipated to generate substantial fugitive dust. Potential for increased generation of fugitive dust would also decrease in time as vegetation regrows and soils stabilize. Nevertheless, construction activities would be required to comply with SCAQMD Rule 403 to control fugitive dust, consistent with Certified EIR MM AQ-1.3. Additionally, the Project would comply with the California Air Resources Board (CARB) requirements to minimize idling emissions from diesel-fueled vehicles (i.e., diesel-powered vehicles are not permitted to idle for a period of more than 5 minutes). As such, the Project would not conflict with or obstruct implementation of the applicable AQMP and impacts would be *less than significant with mitigation*.

b. Less than Significant with Mitigation Incorporated. Trail construction would involve use of trail dozers, Bobcat® loaders, or 4x4 ATVs, as well as trucks and private vehicles for the transport of equipment and materials, and other small construction equipment (e.g., chainsaws). Project-

related construction activities would require grading that has been minimized to follow the natural topography within the canyon and avoid removal of vegetation to the maximum extent feasible. As previously discussed, the Certified EIR estimated that maximum daily construction emissions associated with the proposed improvements for Escondido Canyon Park in the Certified EIR would not exceed established regional emissions thresholds. Since the Project represents only a small portion of the overall emissions estimated for the Escondido Canyon Park improvements as proposed in the Certified EIR, construction emissions from this Project would be within or below those total emissions estimated in the Certified EIR. Thus, Project construction impacts on regional emissions thresholds would also be *less than significant*.

As identified in the Certified EIR, based on the LST methodology adopted by SCAQMD, anticipated construction emissions associated with Escondido Canyon Park would exceed localized emissions thresholds for PM₁₀ and PM_{2.5} if construction were to occur within 25 meters (82 feet) of a sensitive receptor, such as a residence. Construction of the Project would involve a smaller area, involve less intensive construction schedules and activities, and would require much less equipment than a typical 1-acre project. For instance, a typical 1-acre project located as close as 25 meters from a sensitive receptor could involve construction of a 40,000-square-foot structure constructed over the shortest (more equipment intensive) duration feasible, and would not exceed the most stringent LSTs. In comparison, the Project would involve only a few pieces of small mechanized equipment smaller than those utilized for typical projects and construction of only 0.54 acre. Therefore, the Project is not anticipated to exceed localized emissions thresholds. Although trucks would periodically pass residences on Murphy Way when trail construction is occurring near the western trail terminus, the nearest distance project construction activities would occur to a sensitive receptor would be approximately 680 feet (207 meters), which far exceeds the 50-meter separation required of Certified EIR MM AQ-2 to reduce localized emissions to a less than significant level. As also required by Certified EIR MM AQ-2, any heavy-duty diesel-powered construction equipment would be equipped with a Level 3 diesel particulate filter. Therefore, trail construction would not exceed regional emissions thresholds and impacts would be *less than significant with mitigation*.

With regard to operational emissions, the Project is not anticipated to substantially increase the use of Escondido Falls Trail or Escondido Canyon Park, and the number of vehicle trips to and from the trail public parking area would be materially the same as under existing conditions (see Section 4.15, *Recreation*, and Section 4.16, *Transportation and Traffic*). Vehicles would be the primary source of emissions during operation, as trail users travel to and from the paid public parking lot on Winding Way or along the PCH by car prior to hiking to the proposed trail alignment. However, the number of visitors would not meaningfully increase under the Project. Therefore, operation of the Project would be *less than significant*.

c. Less than Significant with Mitigation Incorporated. SCAQMD's *CEQA Air Quality Handbook* identifies methodologies to determine the cumulative significance of land use projects based on performance standards and emission reduction targets necessary to attain the federal and state air quality standards identified in the AQMP. According to SCAQMD's *CEQA Air Quality Handbook*, projects that are within the identified emission thresholds for construction and operation should be considered less than significant on a cumulative basis (SCAQMD 1993). As discussed under Impact Discussion (a) and (b) above, emissions associated with construction and operation of the Project are not anticipated to exceed adopted thresholds with implementation of MM AQ-1.1, MM AQ-1.3, and MM AQ-2, and therefore would not cause a cumulatively considerable net increase in any criteria pollutant. Therefore, impacts are *less than significant with mitigation*.

d. Less than Significant with Mitigation Incorporated. The Project would not generate emissions proximate to sensitive receptors given that Project emissions are not anticipated to reach or exceed the most stringent LSTs. Further, the Project would be located a considerable distance (approximately 680 feet) from the nearest sensitive receptor (private residence). Given that the Project would be located in the Santa Monica Mountains nearby the Pacific Ocean and prevailing winds, combined with the relatively small size of the Project and area of ground disturbance, it is not expected that nearby sensitive receptors would be exposed to substantial or adverse pollutant concentrations. In addition, the Project is not anticipated to generate substantial changes in existing trail use and traffic and would not increase vehicle traffic at a congested intersection; thus, the Project would not result in substantial localized CO emissions concentrations (i.e., “hotspot”). As indicated above, localized emissions would be less than significant, with the highest emissions occurring during construction. Implementation of required mitigation would further reduce impacts and pollutant emissions during trail construction and operation. Therefore, impacts are considered *less than significant with mitigation*.

e. No Impact. The Project would not result in new surface paving or other sources of objectionable odors during construction of the new connector trail. Additionally, the Project would not result in the generation of smoke or ash during construction or operation of the trail. Project implementation would permit equestrian use along the proposed trail, which may result in potential generation of equestrian-related odors. Odors associated with trail use by equestrians would not result in a significant impact to sensitive receptors as the Project area is not within the vicinity of a substantial number of people and the nearest home is approximately 680 feet from the trail. Given that no established road shoulder paths exist along Murphy Way, it is not anticipated that equestrians would access the trail from Murphy Way where residences are located adjacent, and equestrians would continue to access the route from the Escondido Falls Trail. Further, trash receptacles provided at the trailheads would continue to be emptied routinely by MRCA staff. Therefore, the Project would have *no impact* to objectionable odors.

Required Mitigation Measures

The Certified EIR identified requirement of MMs AQ-1.1 through AQ-1.3 and MM AQ-2 to reduce air quality impacts of proposed recreational improvements. For convenience, the applicable mitigation measures of the Certified EIR are restated below. However, no other significant impacts have been identified for implementation of the final trail alignment proposed under the Project. Therefore, additional mitigation is not necessary.

MM AQ-1.1 Construction Timing. *The Certified EIR requires that no more than one Park site or other improvement area be developed at a single time in order to ensure that construction emissions would not exceed the 100 lb/day NOx threshold.*

Plan Requirements and Timing: Prior to the start of construction, the MRCA shall ensure that no improvements previously proposed under the Certified EIR are simultaneously scheduled for construction.

Monitoring: The MRCA shall monitor construction timelines for any improvement previously proposed under the Certified EIR.

MM AQ-1.3 SCAQMD Rule 403. *Consistent with SCAQMD Rule 403, it is recommended that fugitive dust generated by grading and construction activities be kept to a minimum with a goal of retaining dust on the site, by following the dust control measures listed below:*

- a) *During clearing, grading, earth moving, excavation, or transportation of cut or fill materials, water trucks or sprinkler systems shall be used to prevent dust from leaving the site and to create a crust after each day's activities cease.*
- b) *During construction, water truck or sprinkler systems shall be used to keep all areas of vehicle movement damp enough to prevent dust from leaving the site. At a minimum, this would include wetting down such areas later in the morning and after work is completed for the day and whenever winds exceed 15 miles per hour.*
- c) *Soil stockpiled for more than two days shall be covered, kept moist, or treated with soil binders to prevent dust generation.*
- d) *Vehicle speeds on unpaved roads shall be less than 15 miles per hour.*
- e) *All grading and excavation operations shall be ceased when wind speeds exceed 25 miles per hour.*
- f) *Dirt and debris spilled onto paved surfaces at the construction site and on the adjacent roadways shall be swept, vacuumed, and/ or washed at the end of each workday.*
- g) *All trucks hauling dirt, sand, soil, or other loose material to and from the construction site shall be tarped and maintain a minimum two feet of freeboard.*
- h) *i) Review and comply with any additional requirements of SCAQMD Rule 403.*

Plant Requirements and Timing: The above measures shall be integrated into the final project construction plans prior to construction activity. Implementation of the measures should be an on-going obligation of the project.

Monitoring: Prior to construction activity, MRCA staff shall review and approve all construction plans to ensure consistency with the above measures. During construction efforts and prior to project sign-off, MRCA staff shall verify implementation of applicable portions of the above measures.

MM AQ-2 ***Trail Grading.** The following measure shall be adhered to during grading and construction to reduce PM₁₀ and PM_{2.5} impacts to sensitive receptors from fugitive dust and construction equipment:*

- a) *All construction shall either (1) be prohibited within 50 meters of a sensitive receptor, including but not limited to residential units or (2) heavy-duty diesel-powered construction equipment shall be equipped with a Level 3 diesel particulate filter verified by the California Air Resources Board or U.S. Environmental Protection Agency for the make, model, and model year of the equipment being used.*

Plant Requirements and Timing: Mitigation measure AQ-2 shall be integrated into the final project construction plan, prior to construction activity. Implementation of the measures should be an on-going obligation of the project.

Monitoring: Prior to construction activity, MRCA staff shall review and approve all construction plans to ensure consistency with the above measures. During construction efforts and prior to project sign-off, MRCA staff shall verify implementation of applicable portions of the above measures.

Residual Impacts

With implementation of above mitigation identified in the Certified EIR, residual impacts to air quality would be reduced to *less than significant with mitigation*.

4.4 Biological Resources

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial adverse effect on federally protected wetlands, as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal wetlands, etc.), through direct removal, filling, hydrological interruption or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Information regarding biological resources was derived from the associated technical reports prepared for the Certified EIR, along with the biological technical reports prepared by Forde Biological Consultants for the Project and contained in Appendix B. As discussed in Section 1.0, *Project Introduction*, the following discussion largely describes pre-fire conditions within the Project area and has been supplemented with discussion of post-fire conditions where appropriate to describe potential impacts of the Project under post-fire conditions.

Existing Setting

The Project site is located in the south-facing coastal foothills and drainages of the Santa Monica Mountains. In the Project vicinity, the Santa Monica Mountains support diverse habitats, including chaparral, oak and riparian woodlands, wetlands, and grasslands intermixed with rural residential development. Downstream coastal and marine habitats also support sensitive resources. The

proposed trail would cross two undeveloped parcels within an area designated as an Environmentally Sensitive Habitat Area (ESHA) under the City LIP ESHA Overlay Map and confirmed by Forde Biological Consultants. Forde Biological Consultants conducted a Rare Plant Survey, reconnaissance level wildlife survey and raptor surveys in April and May of 2016. Forde also conducted a wetland delineation and follow-up botanical surveys in May 2018. The results of these findings are summarized in a Biological Assessment that also provides the primary source of information for this analysis (Appendix B). The Biological Assessment was peer reviewed by Wood Environment & Infrastructure Solutions, Inc. (Wood) biologists in April and June 2018. The City General Plan Conservation Element Figure CO-2D maps the Project within the Escondido Canyon Watershed, a designated significant watershed (Figure 5). This significant watershed supports environmentally sensitive riparian and woodland habitat from which runoff could impact particularly sensitive marine resource areas (City of Malibu 1995). Consistent with Section 30240 of the California Coastal Act, significant watersheds are considered necessary to ensure protection of sensitive resource areas and associated species.

Flora

The proposed trail alignment is located within the Immediate Coast (Coastal Sage Scrub) Environmental Region for the SMMNRA (CDFW 2006). Vegetation communities within Escondido Canyon Park, including along the three tentative trail alignments evaluated in the Certified EIR, have been identified as ESHA habitat, consisting of the following vegetation communities (SMMC/MRCA Certified EIR 2010):

- Ashleaf Buckwheat
- Coast Live Oak/Toyon – Poison Oak
- Coast Live Oak
- California Sagebrush Scrub – Black sage
- Poison Oak Scrub
- Purple sage – California Sagebrush

The Biological Assessment identified two vegetation communities along the proposed trail alignment: the *Salvia leucophylla* (purple sage) Shrubland Alliance and the *Quercus agrifolia* (California live oak) Woodland Alliance. Pre-fire, the purple sage vegetation community dominates the east-facing slope east of Murphy Way. This vegetation community is dominated by sagebrush species such as purple sage, black sage (*Salvia mellifera*), and poison oak (*Toxicodendron diversilobum*) in the lower slope areas, and some annual grasses. The California live oak vegetation community was present along the channels of the tributary canyon. This vegetation community supported a healthy understory of riparian species such as poison oak, bush monkey flower (*Mimulus aurantiacus*), arroyo willow (*Salix lasiolepis*), California coffeeberry (*Frangula californica*), and climbing penstemon (*Keckiela californica*). Invasive species present along the trail alignment and Escondido Creek included, but are not limited to: maltese star thistle (*Centaurea melitensis*); milk thistle (*Silybum marianum*); castor bean (*Ricinus communis*); english ivy (*Hedera helix*); and Brazilian pepper tree (*Schinus terebinthifolius*) (Appendix B). Although the fire largely burned existing vegetation and exposed bare soils, vegetative regrowth is anticipated to cover most bare soils within 1-2 years.

The Rare Plant Surveys identified only non-special-status plant species along the trail alignment (Appendix B). However, a review of the California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDB) and the California Native Plant Society's (CNPS) Inventory of Rare and Endangered Plants (IREP) for 12 U.S. Geological Survey (USGS)

quadrangles identified a low to moderate potential for occurrence of special-status plant species in the Project vicinity (Table 2).

Table 2. Special-Status Plant Species with Potential to Occur within the Project Vicinity

Common Name	Species Name	Federal Status	State Status	CNPS Rank	Potential to Occur
Braunton's milk-vetch	<i>Astragalus brauntonii</i>	E	--	1B.1	Low
Coulter's saltbush	<i>Atriplex coulteri</i>	--	--	1B.2	Moderate
Davidson's saltscale	<i>Atriplex serenana</i> var. <i>davidsonii</i>	--	--	1B.2	Low
Perry's spineflower	<i>Chorizanthe perryi</i> , var. <i>parryi</i>	--	--	1B.1	Moderate
Blochman's dudleya	<i>Dudleya blochmaniae</i> ssp. <i>blochmaniae</i>	--	--	1B.1	Low
Many-stemmed dudleya	<i>Dudleya multicaulis</i>	--	--	1B.2	Low
Mesa horkelia	<i>Horkelia cuneate</i> var. <i>puberula</i>	--	--	1B.1	Moderate
Decumbent goldenbush	<i>Isocoma menziessii</i> var. <i>decumbens</i>	--	--	1B.2	Low
White-veined monardella	<i>Monardella hypoleuca</i> ssp. <i>hypoleuca</i>	--	--	1B.3	Moderate
Southern curly-leaved monardella	<i>Monardella sinuate</i> ssp. <i>sinuate</i>	--	--	1B.2	Low
Ojai navarretia	<i>Navarretia ojaiensis</i>	--	--	1B.1	Low
Chaparral ragwort	<i>Senecio apbanactis</i>	--	--	2B.2	Moderate
Salt spring checkerbloom	<i>Sidalcea neomexicana</i>	--	--	2B.2	Low
Notes:		CNPS:			
Federal Status		Rank 1A: Plants presumed Extinct in California			
E: Endangered = Danger of extinction throughout range		Rank 1B: Plants Rare, Threatened, or Endangered in California and elsewhere			
T: Threatened = Likely to become endangered in foreseeable future throughout range		Rank 2: Plants Rare, Threatened, or Endangered in California, but more common elsewhere			
State Status:		Rank 3: Plants about which we need more information			
E: Endangered = Applies to a species whose survival and reproduction in the wild are in immediate jeopardy from one or more causes		Rank 4: Plants of limited distribution			
T: Threatened = Applies to a species that is existing in small numbers throughout all or a significant portion of its range that it may become endangered		.1 – Seriously threatened in California			
Refer to Appendix B for a full list of all special-status plant species identified and a statement of the reasoning for their potential to occur along the trail alignment.		.2 – Fairly threatened in California			
		.3 – Not very threatened in California			

Source: Forde Biological Consultants 2018; Appendix B.

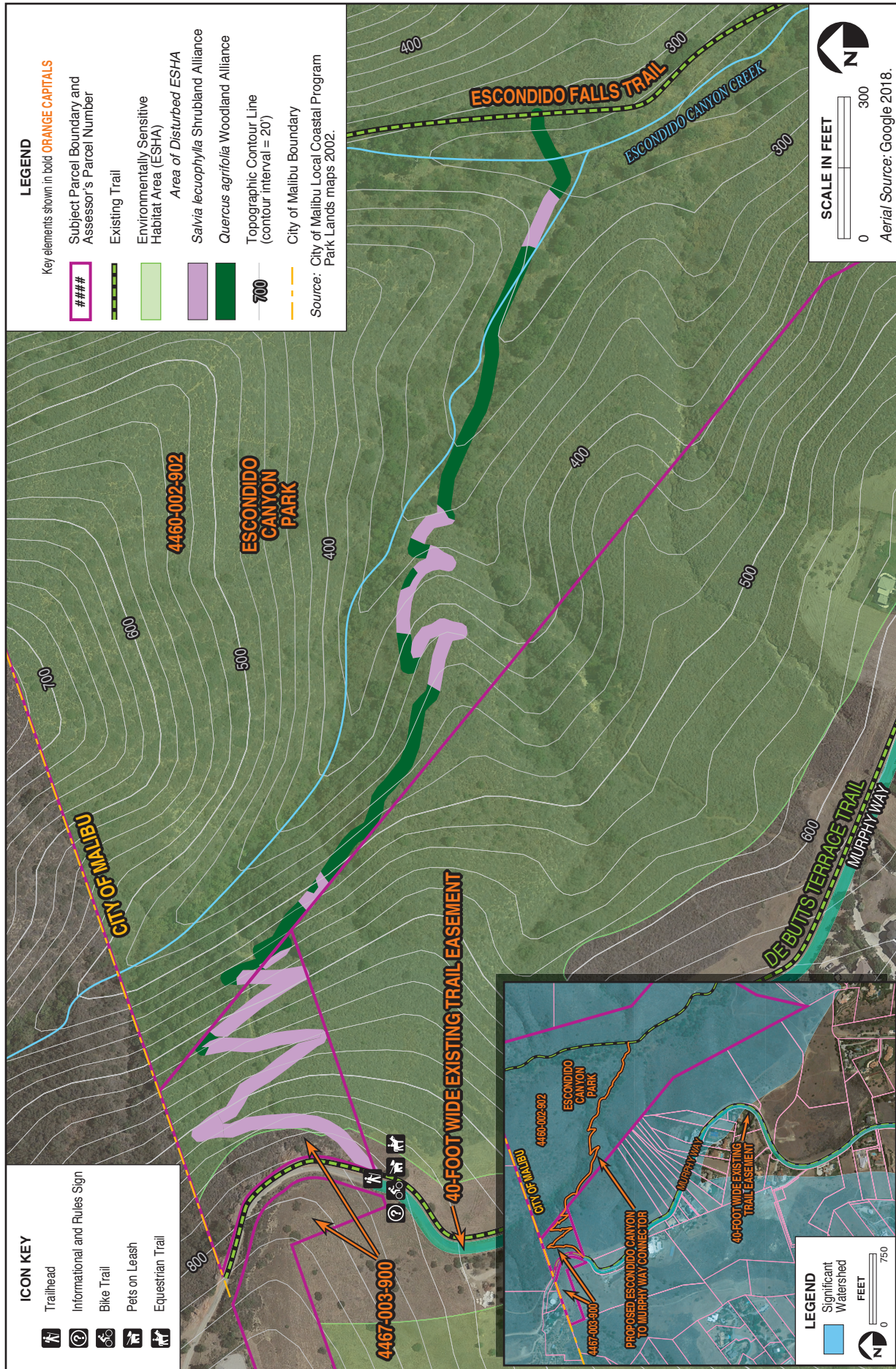


FIGURE 5

Biological Constraints

Protected Native Trees

The City's Native Tree Protection Ordinance (LCP, Chapter 5 of the LIP) protects native trees including alder (*Alnus rhombifolia*), California walnut (*Juglans californica*), oak (*Quercus agrifolia*), toyon (*Heteromeles arbutifolia*), and California sycamore (*Platanus racemosa*). Trees protected by this ordinance must have at least one trunk with a diameter measuring 6 inches or more or a combination of two trunks with diameters totaling 8 inches or more as measured 4.5 feet above natural ground. Most of the live oak, California sycamore, and California black walnut that occur within the tributary to Escondido Creek along the proposed trail meet the definition of a protected tree. The Woolsey Fire of November 2018 resulted in damage to many of these trees, and the extent of such damage cannot accurately be determined at this time. However, for the sake of this analysis, these trees are considered to remain healthy and protected under the City's Native Tree Protection Ordinance. It is likely that limb or stump re-sprouting of damaged or fire scarred trees would occur.

Wetlands and Jurisdictional Bodies

The proposed trail is located entirely within the Escondido Canyon Watershed. The USFWS National Wetland Inventory depicts several drainages in the vicinity of the proposed trail. The proposed trail would cross four of these drainages. Forde biologists delineated the extent of these drainages in May 2018; the drainages were found to be as follows (see Appendix D of the Forde Biological Assessment Report for more detail). All or most vegetation within these drainages was burned during the Woolsey Fire but is anticipated to regrow and recovery over the next 5 years. It should be noted that winter rains will likely deposit added sediments over the next 1-3 years within these drainages from erosion on recently burned slopes.

Drainage 1 (Escondido Creek)

Escondido Creek is the main drainage conveying water to the Pacific Ocean in the 2,300-acre Escondido Canyon watershed. Escondido Creek is an intermittent drainage approximately 14 feet wide between the tops of its banks and approximately 10 feet wide between its ordinary high-water marks. The *Quercus agrifolia* Woodland Alliance dominates the drainage where the trail crossing is proposed. California sycamore, California black walnut, and arroyo willow also occur. The limit of CDFW jurisdiction extends to the outer edge of any contiguous riparian *Quercus agrifolia* Woodland Alliance.

Drainage 2

Drainage 2 is an intermittent tributary to Escondido Creek that is approximately 12 feet wide between the tops of its banks and approximately 10 feet wide between its ordinary high-water marks. *Quercus agrifolia* Woodland Alliance dominates the entire length of the drainage. California sycamore, California black walnut, and arroyo willow also occur. The limit of CDFW jurisdiction extends to the outer edge of any contiguous *Quercus agrifolia* Woodland Alliance.

Drainage 3

Drainage 3 is an intermittent tributary to Drainage 2 that is approximately 5 feet wide from top of bank to top of bank along the majority of its length and about 6 feet where it meets Drainage 2. It is approximately 3 feet wide between the ordinary high-water marks. The *Quercus agrifolia* Woodland Alliance dominates its banks on the Project site where it meets Drainage 2 and where the trail will cross it. The limit of CDFW jurisdiction extends to the outer edge of any contiguous *Quercus agrifolia* Woodland Alliance.

Drainage 4

Drainage 4 is an ephemeral tributary to Drainage 2 that is approximately 4 feet wide from top of bank to top of bank along most of its length but ranges between 3–6 feet in some areas. The distance between ordinary high-water marks is approximately 2 feet wide. The *Salvia leucophylla* Shrubland Alliance dominates its banks. *Quercus agrifolia* Woodland Alliance dominates its banks where it meets Drainage 2. The limit of CDFW jurisdiction is limited to the area between the tops of banks; adjacent plant communities are not under CDFW jurisdiction.

Fauna

Pre-fire, most of the Project vicinity supported high value wildlife habitat, excluding limited disturbed or developed lands, which are generally confined to road corridors that offer little to no habitat value, such as Murphy Way. Coastal Sagebrush Scrub provides habitat to a variety of wildlife species for food and cover. Riparian and woodland communities provide food, water, thermal cover, escape, nesting, and migration and dispersal corridors for an abundance of wildlife. Disturbed areas or bare ground provide relatively little value to most wildlife species because these areas are devoid of vegetation or are vegetated with annual weedy plant species of limited food, water, and cover value. These areas can also fragment habitat or support human activity that discourages the presence of wildlife.

Threatened or endangered special-status wildlife species known to occur, or with potential to occur, along the proposed trail alignment include four reptile species, one amphibian, nine bird species and four mammals, several of which were observed and/or have a high potential to occur (Table 3; Appendix B). Such species include, but are not limited to: coast horned lizard (*Phrynosoma blainvillii*); San Diego mountain kingsnake (*Lampropeltis zonata pulchra*); San Diego desert woodrat (*Neotoma lepida intermedia*); Santa Monica grasshopper (*Trimerotropis occidentiloides*); and southern shoulderband snail (*Helminthoglypta tudiculata convicta*). Reptile and amphibian species have a moderate to high potential to occur along the trail alignment, while most bird species are thought to use the site for foraging or during flyovers. For mammal species, desert woodrat is known to be present while the pallid bat is expected to be present. Other wildlife species have low to moderate potential to occur (Table 3). In post-fire conditions, high-value wildlife habitat is scarce, and wildlife is less likely to be present due to the lack of ground cover, foraging habitat, abundance of prey species, etc. However, most species native to the Southern California chaparral environment are well adapted to fire and post-fire conditions. With the reestablishment of fire-adapted vegetation, it is likely that wildlife would soon begin to reestablish within the Project site within 1-2 years following the fire. Therefore, the above identified wildlife are expected to be present following, or potentially before Project construction.

Wildlife Movement

The NPS, CDFW, and SMMC have expressed concerns about the adverse effects of urbanization on wildlife, particularly the fragmentation of habitat areas, which prevents the freedom of movement that many species need. Within the SMMNRA, undeveloped public lands or park lands support the preservation of habitat linkages between large blocks of core habitat.⁵ There are essentially two types of linkages: 1) Landscape Linkages, and 2) Connectivity Choke Point Corridors. A Landscape Linkage may or may not be constricted, but it is essential to maintain the connectivity function of a particular region. A Connectivity Choke Point Corridor is a narrow, often short, and impacted corridor between blocks of habitat. This type of linkage typically requires that wildlife move through a choke point structure, such as a culvert, underpass, overpass, or tunnel.

⁵ A linkage is a feature that connects at least two blocks of habitat. The assumed function of a linkage is to facilitate dispersal of individuals between blocks of habitat, allowing for long-term genetic interchange and for re-colonization of blocks of habitat from which populations have been locally extirpated.

Escondido Creek and its tributaries remain relatively undeveloped and support highly valuable natural habitat. Urban development and larger transportation corridors (primarily the PCH) located to the east, west, and south of the canyon can create barriers to dispersal for terrestrial wildlife, especially for medium and large carnivores. Small mammals, particularly those well adapted to the urban-rural interface, may be less hindered or affected by rural development within the vicinity. However, in other cases, a minimal degree of development or disruption of the natural habitat can pose as a barrier to the movement of some species of wildlife.

Impact Discussion

a. Less than Significant with Mitigation Incorporated. The Certified EIR concluded that trail alignment 4b would result in a less than significant impact to special-status species with the incorporation of MMs BIO-1.11 through BIO-1.19 and BIO-4.1 through BIO-4.5. These MMs from the Certified EIR require avoidance of nesting birds, pre-construction surveys, limitations on construction operations, incorporation of standard BMPs, and compensatory replacement of disturbed habitat.

Table 3. Special-Status Wildlife Species with Potential to Occur within the Vicinity of the Project

Common Name	Species Name	Federal Status	State Status	CNPS Rank	Potential to Occur
Reptiles					
Coast horned lizard	<i>Phrynosoma blainvilli</i>	--	--	SSC	Moderate
Southern California legless lizard	<i>Anniella stebbensi</i>	--	--	SSC	Expected
Coast patch-nose snake	<i>Salvadora hexalepis virgultea</i>	--	--	SSC	High
San Diego mountain kingsnake	<i>Lampropeltis zonata pulchra</i>	--	--	SSC	Moderate
Amphibians					
Coast Range newt	<i>Taricha torosa torosa</i>	--	--	SSC	High
Birds					
Sharp-shinned hawk	<i>Accipiter striatus</i>	--	--	WL	May Forage During Migration & Winter
Cooper's hawk	<i>Accipiter cooperii</i>	--	--	WL	Observed
Merlin	<i>Falco columbaris</i>	--	--	WL	May Forage During Migration & Winter
Long-eared owl	<i>Asio otis</i>	--	--	SSC	Expected
Short-eared owl	<i>Asio flammeus</i>	--	--	SSC	May Fly Over During Migration & Winter
Vaux's swift	<i>Chaetura vauxi</i>	--	--	SSC	May Forage/Fly Over During Migration
Black swift	<i>Cypseloides niger</i>	--	--	SSC	May Forage/Fly Over During Migration
Loggerhead shrike	<i>Lanius ludovicianus</i>	--	--	SSC	Low
Bank swallow	<i>Riparia riparia</i>	--	E	--	May Forage/Fly Over During Migration

Table 3 (Continued). Special-Status Wildlife Species with Potential to Occur within the Vicinity of the Project

Common Name	Species Name	Federal Status	State Status	CNPS Rank	Potential to Occur
Mammals					
Pallid bat	<i>Antrozous pallidus</i>	--	--	SSC	Expected – Potential Roost Sites Present
Western red bat	<i>Lasiurus blossevilli</i>	--	--	SSC	Low – Potential Roost Sites Present
Ringtail	<i>Bassariscus astutus</i>	--	--	FP	Moderate – Potential Den Sites Present
San Diego desert woodrat	<i>Neotoma lepida intermedia</i>	--	--	SSC	High – Woodrat Houses Present

Notes:

Federal Status:

E: Endangered = Danger of extinction throughout range

T: Threatened = Likely to become endangered in foreseeable future throughout range

State Status:

E: Endangered = Applies to a species whose survival and reproduction in the wild are in immediate jeopardy from one or more causes

T: Threatened = Applies to a species that is existing in small numbers throughout all or a significant portion of its range that it may become endangered

Refer to Appendix B for a full list of all special-status plant species identified and a statement of the reasoning for their potential to occur within the vicinity of the Project.

CDFW:

SSC: Species of Special Concern

WL: Watchlist Species

FP: Fully Protected = Fully protected under the California Department of Fish and Game Code

Source: Forde Biological Consultants 2018; Appendix B

Depending on the timing of trail construction post-fire, trail construction would result in the disturbance of up to approximately 0.54 acre of *Salvia leucophylla* Shrubland Alliance and *Quercus agrifolia* Woodland Alliance as burned vegetation regrows, with the majority of disturbance occurring in the Shrubland Alliance vegetation community. These vegetation communities can provide habitat for a number of special-status species, although none were observed in the limited site surveys of the proposed trail alignment (Table 2 and Table 3). Project-created habitat disturbance would include up to approximately 144 square feet of USACE jurisdictional waters and 101 square feet of CDFW jurisdictional waters due to the placement of large stones for creek crossings along Escondido Creek and tributaries. Trail construction would not result in a permanent disturbance to CDFW riparian habitat because native vegetation at, and upland of, the crossings would only be cut and trimmed as necessary. No protected trees would be removed to accommodate the trail, including those comprising the riparian woodland along the affected streams. While Project-created disturbance to native habitat would be limited to less than one acre, potentially significant impacts to special-status species could occur. Further, construction within 100 feet of active bird nests could disrupt breeding and nesting of native or migratory bird species, and the removal of large tree limbs may affect bat roosts if present.

Implementation of the BMPs listed in Section 3.2, *Project Best Management Practices*, would help to reduce adverse effects to sensitive biological resources. However, even with implementation

of these BMPs, implementation of the Project would continue to have a potentially significant impact to special-status species if present on the unsurveyed portion of the trail alignment particularly dependent on the timing of trail construction post-fire, or if active bird nests are encountered. Implementation of **MM BIO-1** through **MM BIO-6** would ensure sensitive special-status species are appropriately avoided, relocated, or protected during construction of the Project and that the potential to adversely affect special-status species would be reduced. Consequently, Project construction impacts to designated special-status species would be reduced to *less than significant with mitigation*.

Operation of the proposed trail connection would not result in direct adverse effects to special-status species. Due to the potential presence of deterrent species (poison oak) along the canyon bottom near the creek corridor within Escondido Canyon and steep slopes of the canyon sides, trail users would be generally restricted to use of the trail path, where special-status species are less likely to be present. Public use and maintenance of the trail may result in disturbance or agitation of special-status species residing or resting in the area immediately adjacent to the trail; however, these species would typically relocate within the immediate vicinity, then return once disturbance (noise from trail users) has ceased. Therefore, operation of the trail over the long term would not result in the direct disturbance to or harm of any special-status species, and impacts are considered to be *less than significant*.

b. Less than Significant with Mitigation Incorporated. The Certified EIR concluded that trail alignment 4b would result in a less than significant impact to sensitive natural communities with the incorporation of MMs BIO-1.1 through BIO-1.19, BIO-2.1, BIO-2.2, and BIO-3. These measures from the Certified EIR to reduce impacts require avoidance of known special-status species and habitat, pre-construction surveys, incorporation of standard BMPs, and compensatory replacement of disturbed habitat.

Depending on the timing of trail construction post-fire, trail construction would disturb up to approximately 0.30 acre of the existing *Quercus agrifolia* Woodland Alliance and 0.24 acre of the existing *Salvia leucophylla* Shrubland Alliance, for a total construction disturbance of 0.54 acre of designated ESHA. The Project would include reseeded of approximately 0.18 acre of the disturbed area, adjacent to the completed footpath, with native vegetation following construction (see BMPs in Section 3.2). Consequently, Project implementation would result in a permanent disturbance of up to 0.36 acre of ESHA. The disturbance of ESHA habitat would be considered significant if a project's proposed use compromises the overall function of the ESHA. Per City Local Implementation Plan (LIP) Section 4.5.3, trails are a permitted use within the ESHA Overlay because of their limited potential to affect ESHA habitat. The City Biologist approved the trail alignment on April 25, 2017, finding that impacts to ESHA habitat would be less than significant. The City approval noted that the trail would cross jurisdictional waters (Escondido Creek and its tributaries), thus requiring a CDFW Streambed Alteration Notification package to address impacts to these jurisdictional drainages. CDFW approved the Project on July 12, 2017 (No. 1600-2017-0014-R5), finding that the proposed trail would not result in significant impacts to jurisdictional waters or riparian habitat, provided that any rare plant species identified during construction be protected in place until an appropriate relocation and mitigation plan is developed and implemented. This approval memorializes the Project's BMPs and identifies MMs to reduce harm to Escondido Creek and its affected tributaries. Similarly, trail construction would not result in a permanent disturbance to riparian vegetation because native vegetation at, and upland of, the crossings would only be cut and trimmed as necessary. No protected trees would be removed to accommodate the trail, including those comprising the riparian woodland adjacent to the onsite drainages, and substantive encroachment into the protected zones of native trees is not anticipated.

Previously identified Certified EIR MMs to reduce potential impacts to biological resources have been adjusted to mitigate Project site-specific impacts through implementation of **MM BIO-1** through **MM BIO-3**. These measures would ensure that trail construction is monitored by a qualified biologist and that sensitive vegetation is avoided to the maximum extent feasible. If rare plants are encountered and cannot be avoided, these measures would also require the preparation of a relocation and mitigation plan as required by the CDFW. Therefore, Project impacts to ESHA habitat and riparian habitat would be reduced to *less than significant with mitigation*.

c. Less than Significant. The Certified EIR concluded that trail alignment 4b and other improvements in Escondido Canyon would not directly or indirectly impact wetlands or wetland habitat, and impacts were therefore considered to be less than significant. As for the Project, trail construction would place stepping stones at trail creek crossings that would affect an estimated 101 square feet (less than 0.01 ac) of USACE jurisdictional waters and 144 square feet (less than 0.01 ac) of CDFW jurisdictional waters. Trail construction would not result in a permanent disturbance to riparian habitat because native vegetation at, and upland of, the crossings would only be cut and trimmed as necessary. No trees would be removed to accommodate the trail, including those comprising the riparian woodland along the onsite streams. The placement of up to eight stones at each crossing would largely mimic natural conditions, where stones are present in the streams, and would not interrupt stream flows. Because temporary and permanent impacts to jurisdictional waters are less than 0.10 acre and do not result in the “take” of a species protected under the federal Endangered Species Act, the Project would have a less than significant impact to jurisdictional waters and a Pre-Construction Notification is not required to be submitted to the Los Angeles Regional Water Quality Control Board (LARWQCB). Nonetheless, the Project would implement the BMPs identified in Section 3.2 to ensure that sediment and debris do not enter protected waters during construction and operation. Compliance with Chapter 8.4 of the City LIP, requiring the prohibition of earthmoving activities during the rainy season, would also apply to ensure Project construction does not significantly adversely affect wetland resources or instream habitat from erosion or sedimentation. Impacts of the Project on wetland resources are therefore considered to be *less than significant*.

d. Less than Significant. The Certified EIR concluded that trail alignment 4b would temporarily hinder wildlife movement from construction activities. However, this impediment was determined to only temporarily affect wildlife species, and those species would soon return to the area immediately following construction, thus resulting in a less than significant impact. For the Project, the two parcels on which the trail is proposed are not part of any identified landscape linkage and the Project site is not a choke point to the movement of any wildlife. While temporary construction activities would introduce new sources of disturbance that might disrupt the movement of any wildlife (e.g., construction and/or mechanical noise, concentrated work activities), construction would occur over a short period of time and would not present a long-term interference with wildlife movement. In addition, the Project would not involve the construction of any new structures that would affect the movement of any wildlife, either as a direct barrier to their movement, or as a choke point. Silt fencing would be intermittently installed along segments of the trail during construction to reduce runoff and erosion. This fencing would be a minimum of 2 feet in height, and would provide for the movement of wildlife either over or around the fencing. Operation of the trail would not pose a substantial threat to the movement of any wildlife. Trails are often proposed within areas supporting valuable and sometimes undisturbed biological habitat, and are not considered to pose a significant threat to the movement of any biological species. Given that construction and operation of the trail would not introduce substantial new barriers to the movement of wildlife, impacts are considered to be *less than significant*.

e. Less than Significant with Mitigation Incorporated. The Certified EIR concluded that implementation of trail alignment 4b would result in impacts to a total of 28 Coast live oak specimen trees, resulting in a potentially significant impact as a result of conflicts with the City's Native Tree Protection Ordinance. The Certified EIR therefore included the requirement for MMs BIO-1.1 through BIO-1.14, which would reduce impacts to a less than significant degree. As for the Project, construction of the trail would require disturbance and removal of native vegetation, and the potential trimming of and/or encroachment on an undetermined number of mature trees protected under the City's Native Tree Protection Ordinance. Despite fire damage caused to those trees within the Project site and along the proposed trail alignment, these trees are considered to be remaining intact and likely to regrow and return through sprouting of damaged limbs or stumps. However, no trees protected under the City's Native Tree Protection Ordinance would be removed under the Project. While some flexibility in the final trail alignment would be provided to avoid the direct removal of trees, the possibility of tree loss would remain if the trail alignment requires construction activities in tree root zones that result in impaired health and indirect loss of a protected tree. Under the City LIP Section 5.6.1, *Trees with Encroachments*, mitigation is required should any trees "be lost or suffer worsened health or vigor as a result of the proposed development." Therefore, **MM BIO-7** is required to ensure that all trees with encroachment are protected and appropriately mitigated with respect to tree trunk, canopy, and root zone, consistent with the City's Native Tree Protection Ordinance. Therefore, potential impacts to protected native tree species resulting from Project implementation would be reduced to *less than significant with mitigation*.

f. Less than Significant. The Certified EIR concluded that no adopted Habitat Conservation Plans, Natural Community Conservation Plans, or other approved habitat conservation plans exist which would regulate the area. Associated impacts were therefore considered to be less than significant. Similarly, the Project is not located within any approved local, regional, or state Habitat Conservation Plan or Community Conservation Plan. Plans and policies contained in the City General Plan and LIP are specifically protective of ESHA and sensitive resources in the Project area. Impacts to ESHA and sensitive biological resources are addressed in impact discussions above. However, aside from these plans and policies, there are no applicable adopted habitat conservation plans. Therefore, a *less than significant* impact would occur with respect to consistency with local, regional, or state adopted habitat conservation plans.

Required Mitigation Measures

The Certified EIR identified MMs BIO-1.1 through BIO-1.19, BIO-2.1 through BIO-2.2, BIO-3, and BIO-4.1 through BIO-4.5, which would apply to reduce impacts associated with implementation of trail alignment 4b and other proposed improvements. The Project incorporates these MMs, as modified to reflect Project site-specific impacts of the final trail alignment and to better mitigate associated impacts. The following MMs would reduce the Project's biological resource impacts to a less than significant level:

MM BIO-1 ***Trail Construction and Monitoring.** The Mountains Recreation & Conservation Authority (MRCA) shall retain a qualified biologist to conduct a daily pre-construction survey of activities occurring within proximity to protected trees and areas with slopes greater than 20 percent. The qualified biologist shall make recommendations for avoidance of sensitive biological resources, and where necessary, capture and relocate wildlife. Laborers shall use hand held tools to remove initial vegetation to allow common and special-status wildlife a chance to escape and reduce potential for disturbance or harm by heavy machinery, and*

allow the biologist additional opportunity to survey and avoid special-status species and active nests. Heavy machinery is only to be used after the initial vegetation has been cleared or at the discretion of the monitoring biologist.

Plan Requirements and Timing: All requirements shall be included on final grading plans. Trail construction crews must adhere to the recommendations of the qualified biologist to the extent feasible during trail construction. The MRCA must submit final grading plans to the City for review and approval prior to issuance of a grading permit. The MRCA shall submit to City permitting staff the name and contact information for the approved biologist prior to commencement of construction activities. The monitoring biologist must discuss any restrictions with trail crews and MRCA staff during trail construction.

Monitoring: The qualified biologist shall conduct pre-construction surveys prior to vegetation clearance and trail grading activities. During the pre-construction surveys, the qualified biologist should make note of the previous day's construction activities and implement any recommendations as necessary. City permit compliance monitoring staff shall inspect the site as appropriate.

- MM BIO-2** ***Special-Status Plant Species Surveys and Restoration.** The proposed trail alignment has been designed so as to avoid disturbance of special-status plant species. However, if trail construction is proposed to occur during the peak blooming period of any of the rare or special-status plant species expected to occur, a qualified biologist shall be required to conduct pre-construction surveys to identify any individual special-status plant species located within the proposed area of disturbance. If rare or special-status plants are found during these surveys and determined to be vulnerable, the qualified biologist shall make recommendations so that the individuals are avoided. Avoidance may include partial re-routing of the trail. If avoidance is not feasible, then potentially affected individuals or populations of special-status plants shall be recorded and replaced under an appropriate relocation and mitigation plan. The relocation and mitigation plan shall include, at a minimum, the following components:*
- a) Description of the Project/impact site (i.e., location, responsible parties, areas to be impacted, type and number of potentially affected special-status plant species);*
 - b) Goal(s) of the compensatory mitigation project [type(s) and location(s) of specimens to be relocated, restored, replaced, and/or preserved];*
 - c) Description of the proposed compensatory mitigation site (location and size, ownership status, existing functions and values);*
 - d) Implementation plan for the compensatory mitigation site (rationale for expecting implementation success, responsible parties, schedule, site preparation, planting plan);*
 - e) Maintenance activities during the monitoring period, including weed removal as appropriate (activities, responsible parties, schedule);*
 - f) Monitoring plan for the compensatory mitigation site, including no less than quarterly monitoring for the first year (performance standards, target functions and values, target acreages to be established, restored, enhanced, and/or preserved, annual monitoring reports);*

- g) *Success criteria based on the goals and measurable objectives; said criteria to be, at a minimum, at least 80 percent survival of container plants and 30 percent relative cover by vegetation type;*
- h) *An adaptive management program and remedial measures to address any shortcomings in meeting success criteria;*
- i) *Notification of completion of compensatory mitigation and agency confirmation;*
- j) *Contingency measures (initiating procedures, alternative locations for contingency compensatory mitigation, funding mechanism); and,*
- k) *Compensatory replacement of individual specimens or populations shall require seed and/or plant salvage from onsite or local populations, and reestablishment of any equivalent area occupied by the plant either on- or off-site, to be preserved and managed in perpetuity.*

Plan Requirements and Timing: All requirements shall be included on final grading plans. Trail construction crews must adhere to the recommendations of the qualified biologist to the extent feasible for construction of the trail. Any relocation and mitigation plans developed by the qualified biologist shall be submitted to the MRCA and the City for review and approval.

Monitoring: The MRCA shall submit to City permitting staff the name and contact information for the qualified biologist prior to commencement of construction activities. The qualified biologist must discuss any restrictions with trail crews and MRCA staff during trail construction. City permit compliance monitoring staff shall inspect the site as appropriate.

MM BIO-3 ***Worker Environmental Awareness Program.*** *Prior to initiation of construction activities (including staging and mobilization), all personnel associated with Project construction shall attend Worker Environmental Awareness Program (WEAP) training, conducted by a qualified biologist, to aid workers in recognizing special status resources that may occur in the Project area.*

- *The WEAP shall include identification of the sensitive species and habitats, a description of the regulatory status and general ecological characteristics of sensitive resources, and review of the limits of construction and mitigation measures required to reduce impacts to biological resources within the work area. A fact sheet conveying this information shall also be prepared for distribution to all contractors, their employers, and other personnel involved with construction of the Project.*
- *All employees shall sign a form documenting that they have attended the WEAP and understand the information presented to them. The form shall be submitted to the appropriate local jurisdiction for document compliance.*

Plan Requirements and Timing: The WEAP shall be submitted for review by the City biologist and held by the qualified biologist prior to the start of construction.

Monitoring: MRCA staff must attend WEAP trainings and shall document compliance to City permitting staff.

MM BIO-4 ***Woodrat Survey, Avoidance, and Relocation.*** *At the time of vegetation clearance and trail cut, in areas where construction activities have high potential*

to disrupt eligible woodrat habitat, a qualified biologist shall conduct daily pre-construction surveys for the chance of woodrat houses. The surveys shall be conducted within the proposed limits of disturbance of the trail route where woodrat nests are most likely to occur. Woodrat houses that cannot be avoided shall be dismantled and the sticks of each placed in a pile away from the area of proposed disturbance. This will reduce the potential for direct mortality upon woodrat, including San Diego desert woodrat, if present, by providing them a chance to escape and a source of sticks that they could potentially use to rebuild their house.

Plan Requirements and Timing: All requirements shall be included on final grading plans.

Monitoring: The MRCA shall review findings of the surveys submitted by the qualified biologist and demonstrate compliance to City permitting staff. The MRCA shall also ensure compliance with Sections 3505 and 3503.1 of the Fish and Game Code of California.

MM BIO-5 ***Nesting Bird Survey and Protection Plan.** During the initial trail cut, if initiated during the nesting bird season (February 1 to August 30), a qualified biologist shall perform a daily pre-construction nesting bird survey to determine if any nests or nesting activity is occurring at or near the area of work. This survey will reduce the potential for trail construction activities to adversely affect nesting birds.*

- a) The biologist must be familiar with nesting ecology and chronology of southern California species, must have a proven track record for actually finding nests, and must be approved by CDFW and/or preferably holds permits that allow them to survey for nests, including those of rare, threatened, and/or endangered species that are expected to occur in the vicinity.*
- b) If the biologist determines that there are active nests within or adjacent to the trail alignment, they should establish an appropriate buffer for each and clearly mark the areas in the field where the buffers overlap the site.*
- c) Use of heavy machinery and activities that generate high noise levels will not be allowed within nest buffers under any circumstance. Only hand-held tools shall be used within nest buffers. All work occurring within buffers shall be at the discretion of the monitoring biologist.*

Plan Requirements and Timing: If initiated during the nesting bird season, the nesting bird survey shall be completed daily prior to the initial trail cut.

Monitoring: The qualified biologist will provide documentation of survey activities and findings/recommendations to MRCA staff.

MM BIO-6 ***Bat Protection Plan.** If branches greater than 8-inches in diameter or any with significant amounts of peeling bark are to be removed from any of the protected native trees that occur within the Quercus agrifolia Woodland Alliance, a qualified biologist shall inspect them to determine if there are cavities that could be used by bats before removal occurs (the qualified biologist should also check for bird nests). If the qualified biologist finds suitable cavities, they shall conduct an emergence survey to determine if they are actually being used and will use ultrasonic detectors to record and ultimately analyze and determine species. If common bats are discovered using any cavities, removal of the branch shall be*

avoided. If avoidance is not possible, the bats shall be excluded before branch removal occurs. If special-status bats are using any of the cavities, they too shall also be avoided. If avoidance is not possible, the applicant will enter discussions with CDFW to determine appropriate mitigation. Placement of rock near basal cavities shall be positioned in a manner so that it will not block or interfere with flight patterns of bats that may be using them. This placement of rock will reduce the potential for direct adverse effects on bats including silver-haired bat, pallid bat, western small-footed myotis, and Yuma myotis. Hoary bat and western red bat are unlikely to be affected by branch removal, as they roost high up in the foliage of trees.

Plan Requirements and Timing: All requirements shall be included on final grading plans. The qualified biologist shall conduct a pre-construction survey for cavities if a branch greater than 8 inches in diameter is to be removed.

Monitoring: The qualified biologist will provide documentation of survey activities and findings/recommendations to MRCA staff.

MM BIO-7 ***Native Tree Protection.*** *To ensure protection of native protected trees with respect to the tree trunk, canopy, and root zone, the MRCA shall hire a certified arborist to conduct a daily, pre-construction survey of all activities to occur within the protected zones of protected trees, with additional investigation of trees that appear fire stressed, and shall make recommendations for avoidance, and for any necessary remedial work to ensure the health and safety of any trees that are encroached, and any measures necessary to reduce and/or remove potential safety hazards posed by any of these trees. Following construction of the trail, the health of affected trees shall be monitored by the certified arborist as required by LIP Section 5.6.1 (Trees with Encroachments) for up to 10 years, if necessary and determined at the discretion of the City.*

While no substantive encroachments into the protected zones of native trees are anticipated, Should Project activities result in the worsened health of native trees resulting from encroachment, the MRCA shall submit a native tree replacement planting program consistent with LIP Chapter 5, prepared by a certified arborist which specifies replacement tree locations, tree or seedling size, planting specifications, and a monitoring program to ensure that the replacement planting program is successful, including performance standards for determining whether replacement trees are healthy and growing normally, and procedures for periodic monitoring and implementation of corrective measures in the event that the health of replacement trees declines.

Where the worsened health of a tree results in the loss of individuals of protected tree species, mitigation measures in the native tree replacement program shall include, at a minimum, the planting of replacement trees on the Project parcels, if suitable area exists, at a ratio of no less than 10:1. The MRCA shall plant seedlings, less than one year old on an area of the Project parcels where there is suitable habitat. In the case of oak trees, the seedlings shall be grown from acorns collected in the area.

Where onsite mitigation through planting replacement trees is not feasible, mitigation shall be provided by one of the following methods:

- a) *Off-site mitigation shall be provided by planting no less than 10:1, at a suitable site that is restricted from development or is public parkland. The MRCA shall plant seedlings less than one year old in an area where there is suitable habitat. In the case of oak trees, the seedlings shall be grown from acorns collected in the area; or*
- b) *An in-lieu fee shall be provided to the City for the unavoidable impacts of the loss of native tree habitat. The fee shall be based on the type, size and age of the tree(s) removed.*

Plan Requirements and Timing: All requirements shall be included on final grading plans. The certified arborist shall monitor for the health of trees during and following construction activities, for a period of up to 10 years if determined necessary by the City. In-lieu fees, if necessary shall be paid to the City.

Monitoring: The certified arborist shall monitor construction activities, and if necessary, periodically monitor the replacement planting program. MRCA staff shall monitor the health of potentially affected individuals to determine compliance and further need for mitigation.

Residual Impacts

, Implementation of the Project may result in short-term, construction-related impacts and long-term operational impacts due to the permanent loss of habitat dependent on the timing and status of recovery of post-fire conditions; however, with implementation of **MM BIO-1** through **MM BIO-7**, which would require sensitive species surveys, habitat and species compensation and restoration, Project oversight by a qualified biologist, avoidance of sensitive biological resources, and education of Project construction personnel through a WEAP, these impacts would be *less than significant*.

4.5 Cultural Resources

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site or unique geological feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Information regarding cultural resources was derived from the associated technical reports prepared for the Certified EIR, along with the Phase 1 Archaeological Survey Report (ASR) prepared by Wood for the Project and contained in Appendix C.

Existing Setting

Prehistory

There is documented evidence for human occupation of southern California mainland areas for at least 11,000 years. Archaeological investigations of the area of the Santa Monica Mountains has shown evidence of existing village sites, burial grounds, camps or food processing areas, quarries, rock art sites, and other cultural findings suggestive of pre-historic occupation of the region and existence of additional archaeological sites within the City (City of Malibu 1995). However, many ancient sites may have been lost, inundated, or deeply buried as a result of marine transgression, erosion, aggradations, and other natural forces. Approximately 3,000 years ago, a transfer from mobile populations to stationary groups began, bringing a change in subsistence strategies and specialized labor. Trade and technological advances altered the southern Californian Native American communities to resemble contemporary ethnographic populations encountered by the Spanish. The Chumash and Tongva were the primary populations established within the Malibu region.

The coastal bluffs and inland canyons and watershed along the Southern California coast have been occupied by humans dating back as far as 9,000 years. The earliest inhabitants of the region were the Native American group known as the Chumash, and archaeological investigations of the area of the Santa Monica Mountains have shown evidence of existing village sites, burial grounds, camps or food processing areas, quarries, rock art sites, and other cultural findings suggestive of pre-historic occupation of the region and existence of additional archaeological sites within the City (City of Malibu 1995).

History

The historic occupation of southern California can be divided into three settlement periods: the Mission Period (A.D. 1769–1830); the Rancho Period (ca. A.D. 1830–1865); and the American Period (ca. A.D. 1865–1915). Construction of the missions altered both the physical and cultural

landscape of the region. The missions were the center of Spanish influence in the region and affected native patterns of settlement, culture, trade, industry, and agriculture. Secularization of lands and a focus on cattle raising marked the Rancho Period, where large land grants of Mission lands were ceded to wealthy, prominent Spanish families. Native Americans continued to work as laborers on ranchos during this period. With California statehood in 1850 and the advent of the American Period, farming and more intensive land uses steadily replaced cattle stock raising. Cattle ranching was substantially curtailed by a prolonged drought in the 1860s. Since statehood, major forces of regional change during the last 150 years have been railroads, maritime shipping, agribusiness concerns, the oil industry, college institutions, and the military (Appendix C).

An archaeological site records and literature search of the California Historical Resources Information System (CHRIS) South Central Coast Information Center (SCCIC) was conducted to identify all recorded archaeological sites and previous cultural resource surveys within 0.5-mile of the proposed trail alignment. Two prehistoric archaeological sites and one artifact isolate are recorded within the 0.5-mile radius; additionally, one historic-period archaeological site has been recorded within the 0.5-mile radius. However, no prehistoric or historic archaeological sites have been recorded within the trail corridor (Appendix C).

Impact Discussion

The Certified EIR concluded that impacts of trail alignment 4b associated with potential discovery of unknown cultural resources or deposits within areas of low archaeological sensitivity on steep slopes would be less than significant with implementation of MM CR-2. Additionally, construction of the proposed trail alignment would not disturb any human remains, including Native American burial remains, and impacts would be less than significant.

a & b. Less than Significant with Mitigation Incorporated. There is no potential for historic structures or resources to occur within the proposed trail corridor because it traverses two undeveloped parcels of open space area.

Regarding archeological resources, the proposed trail alignment is located within a region that has a history of habitation by the Chumash and Tongva populations and would include excavation into a steep hillside with limited potential to support archaeological cultural resources. The ASR completed for Project site-specific impacts included a records search and field survey of the trail alignment. From this investigation, development of the proposed trail is determined to have an unlikely impact on archeological resources due to the greater distance from the known sensitive resource sites; the extent of dense ground cover and steep slopes greater than 20 percent throughout the vast majority of the proposed trail alignment; and the limited amount of grading proposed for development of the proposed trail. It is likely that any habitation and activity area such as a temporary camp or hunting station, where stone tool maintenance or re-sharpening would have occurred, would reasonably be expected to occur on gentler slopes of less than 20 percent, as steeper topography would have not been comfortable and was easily avoided. Given the steepness of the slope and density of vegetation, it is unlikely that cultural resources would be found on the property, the ASR concluded that a less than significant impact to archeological resources is anticipated. Construction of the trail alignment would disturb native soils which may contain unanticipated archeological resources, and would occur in areas where archeological resources may have been obscured of dense vegetation. In the unlikely event that unanticipated resources are discovered, the procedures contained in the City LIP Chapter 11 and MMC Section 17.54.040(D)(4)(b), requiring immediate cease work of construction activities until a qualified archaeologist can assess the nature and significance of the resource, would apply to ensure the appropriate management of uncovered resources. Further, **MM CULT-1** is required to ensure that

areas of dense vegetation on slopes less than 20 percent are surveyed prior to the start of ground-disturbing activities. Therefore, the Project impacts to archeological resources would be *less than significant impact with mitigation*.

c. Less than Significant. The ASR did not identify any paleontological resources or unique geologic features within the Project vicinity. Development of the proposed trail is determined to have an unlikely impact on paleontological resources due to the extent of dense ground cover and steep slopes greater than 20 percent throughout the vast majority of the proposed trail alignment; and the limited amount of grading proposed for development of the proposed trail. Additionally, all development projects in the City must conform to the City's standard conditions of approval and LIP Chapter 11; therefore, as a result of the required adherence to standard conditions of approval, Project impacts to paleontological resources would be *less than significant*.

d. Less than Significant. As discussed in Checklist Question 4.5(a)(b) above, construction of the trail alignment is not expected to encounter archeological resources, which would include human remains, because of: the alignment's distance from known archaeological sites; the extent of dense ground cover and steep slopes greater than 20 percent throughout the vast majority of the proposed trail alignment; and the limited amount of grading proposed for development of the proposed trail. Therefore, the potential to encounter human remains is considered remote. Further, all development projects in the City must conform to the City's standard conditions of approval and LIP Chapter 11; therefore, as a result of the required adherence to standard conditions of approval, Project impacts would be reduced to a *less than significant* level.

Required Mitigation Measures

MM CULT-1 **Ground Disturbance in Areas of Dense Vegetation.** *Vegetation removal within trail corridor segments of less than 20 percent (excluding within drainage corridors) shall initially be cut and removed at the ground surface and shall avoid soil disturbances. After removal of the vegetation, these trail segments shall be resurveyed by a qualified archaeologist. In the event that no cultural resources are recorded, no further measures shall be required.*

If archaeological resources are discovered, work shall immediately cease until a qualified archaeologist can provide an evaluation of the nature and significance of the resources and until the Planning Director can review this information. Thereafter, the procedures contained in LIP Chapter 11 and those in Municipal Code Section 17.54.040(D)(4)(b) shall be followed.

If prehistoric cultural resources are identified during the survey and subsequent disturbances cannot be avoided through minor redesign, a Phase 3 mitigation data collection program shall be undertaken by a qualified archaeologist to adequately characterize the nature and research value of the resource, relative to City of Malibu Cultural Resource Guidelines. This may include a limited excavation, analysis, reporting, and curation of artifacts, as well as monitoring trail construction. Implementation of this measure would ensure that potential trail construction segments would be reduced to less than significant.

Requirements and Timing: A qualified archaeologist shall survey areas of dense vegetation after the vegetation is removed. If no unanticipated archeological resources are discovered, work may proceed. If unanticipated archeological resources are discovered, work must cease in that area. The qualified

archaeologist shall prepare and submit an evaluation to the Planning Director prior to work proceeding.

Monitoring: The qualified archaeologist shall survey areas of dense vegetation after the vegetation is removed and before ground-disturbing activities commence.

Residual Impacts

Implementation of the Project may result in significant impacts if unanticipated archaeological resources are encountered during construction; however, with implementation of **MM CULT-1**, which would require that areas of dense vegetation on slopes less than 20 percent be surveyed prior to the start of ground-disturbing activities, impacts would be *less than significant*.

4.6 Geology and Soils

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death, involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Existing Setting

The geologic setting of the Project site is based on existing reports and maps, including the City's General Plan, USGS and California Geological Survey (CGS) maps; and other available technical documents. The discussion of the geologic setting and impact analysis is primarily based on the results of the *Reconnaissance of Engineering Geologic Constraints for Proposed Park, Parking and Trail Improvements in Ramirez Canyon, Escondido Canyon, Corral Canyon, along Latigo Canyon Road and at Malibu Bluff State Park* (Geologic Constraints Report) prepared for the Certified EIR in September 2009 by Southwestern Engineering Geology, and the *Reconnaissance and Geotechnical Update Report* (Geotechnical Update Report) prepared for trail improvements between Murphy Way and Escondido Canyon in June 2016 by Southwestern Engineering Geology for the Project (both in Appendix D). The Project-specific Geotechnical Update Report was prepared in conformance with the recommended guidelines of the 2009 Geologic Constraints Report. As discussed above, the following discussion largely describes pre-fire conditions within the Project area and has been supplemented with discussion of post-fire conditions where

appropriate to describe potential impacts of the Project. The primary change is that formerly heavily vegetated slopes has been largely or completely burned and denuded of vegetation, increasing the potential for soil slumping, landslides and erosion until vegetation regrows over the next 1-2 years, when most barren areas are anticipated to again have vegetative cover.

The proposed trail alignment is located in the western Transverse Ranges geomorphic province of California, in the coastal Malibu area, on the southern side of the Santa Monica Mountains. The Santa Monica Mountains consist of metamorphic and crystalline Jurassic and Cretaceous rocks overlain by a sequence of Miocene-aged marine and non-marine sedimentary rocks (Appendix D). The proposed trail alignment traverses slopes of the Escondido Creek watershed located between north and south components of the Malibu Coast Fault, within the Upper Topanga Formation or "Topanga Group," per Figure S-1 of the City's General Plan Safety and Health Element containing generalized geologic map sections of the south-central Santa Monica Mountains and Figure S-3 indicating offshore geology and faults (City of Malibu 1995). The Topanga Group includes a thick stratigraphic section primarily of marine sandstone, siltstone, clay shale and volcanic materials. Sedimentary units are expected to be most prevalent along the proposed trail alignment. Near-surface bedrock is expected to be highly fractured and degraded to a texture of clay shale fragments in a matrix of sandy clay to clayey sand (Appendix D).

Geological hazards present in the vicinity of the trail include steep slopes, expansive soils, fault rupture or ground shaking, and landslides (debris flow, rockfall, slope creep). Landslides along the California coast are a common phenomenon, especially along the coastal terrace platforms and coastal foothills, such as those of the Santa Monica Mountains. Further, landslides and debris flows are more common or frequent in areas recently affected by wildfire. The Woolsey Fire burned all or most vegetation and reduced ability of water to penetrate into soils due to high temperatures which can fuse soils, limiting percolation. These conditions, when combined with high-intensity rainfall events, can result in increased risk to slope instability, landslides, or debris flows. For instance, shortly after the Woolsey Fire burned through the Project site, a landslide occurred on November 30, 2018 in the vicinity of the Escondido Falls in the northern-most extent of the Escondido Falls Trail.

In addition, the proposed trail alignment would cross several gullies and drainages during its descent into Escondido Canyon Park from Murphy Way. These gullies and drainage channels may be subject to high amounts of erosion and may result in infrequent washout of the trail at the proposed crossings. Following post-fire conditions, burned areas and slopes may be even more subject to erosion until such a time that vegetation can reestablish, and slope stability improve. At the eastern limits of the slope descending from Murphy Way, the proposed trail alignment would descend along the nose of a ridge across a series of broad switchbacks to the bottom of the unnamed tributary canyon, and then southeastward along the bottom of the wash to where it meets the existing Escondido Falls Trail. The proposed trail alignment joins the drainage near the toe of a mapped landslide.

Impact Discussion

The Certified EIR concluded that impacts related to the previously proposed improvements within Escondido Canyon Park concerning fault rupture, strong ground shaking, landslides (soil creep), soil erosion and loss of topsoil, and soil hazards (i.e., compression, expansion, lateral spreading, collapse) would be potentially significant. However, impacts relating to implementation of trail improvements, including installation of trail alignment 4b, would not have a significant impact related to these hazards and resources. The Certified EIR did, however, include MMs G-1.9, G-2, G-3.6, G-4.3, all of which would ensure adherence to best practices for trail design, reducing

impacts associated with trail improvements to a less than significant degree. All other impacts to geologic and soil resources or hazards associated with trail improvements at Escondido Canyon Park were determined to be less than significant.

a. Less than Significant. The proposed trail alignment is not within any Alquist Priolo hazard zones, nor is the proposed trail in the immediate vicinity of any active faults (CGS 2002). As discussed in the Geologic Constraints Report and Geotechnical Update Report, no known fault passes or extends toward the proposed trail alignment, and threat of seismic rupture is considered low (Appendix D). As the Project is located within the seismically active Southern California region, there is a possibility that there could be (a) trace(s) of (a) previously unidentified fault(s) somewhere onsite. A trace of the Malibu Coast fault is located within the west edge of Escondido Canyon Park. However, the potential for ground rupture along the Malibu Coast fault is generally considered quite low (Appendix D). The proposed trail is not located within an area of potential liquefaction (CGS 2002); however, seismic-related ground failure may still occur. Although the Project is located within an area that is susceptible to seismic and geologic hazards, the proposed trail would not involve any paving or structures which may expose persons to additional threat from seismic or geologic hazards.

The Project is designed to comply with the California Building Code (CBC) (as adopted by the City in the Municipal Code Section 15.04.010) to employ design standards that consider seismically active areas in order to safeguard against major structural failures or loss of life. Therefore, while the Project area would be subject to ground shaking during future seismic events (as are most structures within the Southern California area), the incorporation of proper engineering measures in accordance with existing regulations, building codes, and the application of the engineering recommendations provided in the geological reports, risks to life and property would be minimized. According to the Geotechnical Update Report (Appendix D), the mapped landslide is not anticipated to have any significant impact on the proposed trail construction, nor is the construction anticipated to impact the landslide. Compliance with the City's standard conditions of approval for clearing, grading, erosion control, and drainage requirements would help to ensure that the existing landslide would not cause a substantial impact throughout Project construction and operation. However, the Project vicinity supports steep slopes potentially prone to slope failure such as landslides and mudslides, especially following a wild fire. It is not likely that visitors using the trail would be present during conditions that result in slope failure (e.g., heavy rain events following a wildfire).

Regardless, with adherence to applicable building codes and the recommendations of the Project-specific geological report, impacts associated with the exposure of people or structures to potential substantial adverse effects, including the risk of loss of life, injury, or death would be *less than significant*.

b. Less than Significant. Trail construction would require approximately 326 cy of cut and fill, and an estimated 290 cy of export. As identified in the Geotechnical Update Report (Appendix D), the proposed trail alignment traverses easterly and northeasterly facing slopes inclined at a gradient up to about 1.75:1 before traversing an east-facing slope inclined at a gradient slightly gentler than 1.5:1. The proposed trail alignment descends approximately 75 to 100 feet along the steep, downward slope eastward of Murphy Way to a gently sloping eastward draining tributary of Escondido Canyon. The trail's western and central sections would be comprised of a series of switchbacks and steeper trail segments, with a slope ranging from approximately 12 to 23 percent in grade. The trail's eastern section would parallel a dry wash to the existing Escondido Falls Trail and generally be more level, with a slope ranging from approximately 6 to 9 percent in grade.

Grading operations would be required to comply with the City's standard conditions of approval for clearing, grading, erosion control, and drainage requirements.

In accordance with the City's standard conditions of approval and the Project's design plans, temporary silt fencing would be installed along the trail corridor where sheet flows would occur downhill from construction areas to minimize runoff and erosion during construction, particularly in areas of burned or scarred soils.⁶ To minimize erosion following construction, permanent rolling grade dips and biodegradable sediment control features (coir rolls) would be constructed along the entire length of the proposed trail at an approximate interval of every 200 feet. These features would be constructed perpendicular to the trail such that the top of the coir roll is at a constant elevation and secure in place. Half of the diameter of the coir roll would be embedded into the trail and secured with steel pins and washers.

Per the City's standard conditions of approval, clearing, excavation, and grading would be prohibited during the rainy season (November 1 to March 31) because the trail alignment occurs within a designated ESHA. Further, Project construction would be required to implement a Local Storm Water Pollution Prevention Plan (SWPPP) and Erosion and Sediment Control Plan pursuant to LIP Section 17.4.1. These plans shall identify BMPs during the construction phase to minimize or prevent construction-related pollutant runoff. BMPs include practices such as installing sandbag barriers, silt fencing, dust controls, employee training, and other general good housekeeping practices that help prevent water quality contamination. While erosion of the slope may be more likely depending on post-fire conditions and the timing of Project construction, the implementation of BMPs during Project construction would ensure that erosion and sediment transport are minimized throughout construction and impacts would be *less than significant*.

c. Less than Significant. Potential impacts with regard to liquefaction and landslide potential are evaluated above. The Project would be constructed in conformance with the CBC, the requirements of the Public Works Department, and the Project-specific recommendations of the Geotechnical Update Report and the City's standard conditions of approval, which include maintaining uniform moisture conditions during construction by directing stormwater flows away from trail construction areas and during operations by preventing ponding and other conditions which may lead to the unexpected collapse of slope stabilization or erosion-control features. Construction of the trail in conformance with the Project-specific recommendations of the Geotechnical Update Report would address impacts associated with geologic hazards previously identified in the Certified EIR. Those Certified EIR MMs for trail improvements have therefore been incorporated as part of this Project and are no longer required. Therefore, compliance with these codes and requirements would assure impacts related to unstable soils would be *less than significant*.

Given post-fire conditions within the Project area, potential for increased erosion, soil slumping or even landslide and debris flow can be significantly increased during construction activities, particularly when combined with periods of intense rainfall. However, with implementation of the above referenced measures and BMPs, impacts associated with increased risk of landslide or slope failure are considered to remain *less than significant* and would be further reduced overtime with reestablishment of vegetation and natural slope stabilizing features. Similarly, potential for landslide or slope instability would return to pre-fire conditions such as those described as part of the existing setting over time with recovery of vegetation.

⁶ Silt fencing would be installed to limit the size of the drainage area to no more than 0.25 acre per 100 linear feet of the silt fence, so the maximum flow path length above the barrier is 100 feet, and so the maximum flow gradient above the barrier is 2:1.

d. Less than Significant. Highly expansive soils are commonly found in Malibu, and surface soils in the vicinity of previously proposed improvement areas in the Certified EIR were noted to be characterized by networks of large ground cracks; these suggest that the surface soils are expansive (Appendix D). The Project would be designed and constructed in conformance with the CBC, requirements of the Malibu Public Works Department, and the Project-specific recommendations of the Geotechnical Update Report. Compliance with these codes and requirements would assure impacts related to expansive soils would be *less than significant*.

e. No Impact. The Project would not involve septic tanks or wastewater disposal systems. Therefore, the Project would not have concerns regarding soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater and there would be *no impact*.

Required Mitigation Measures

The Certified EIR identified MM G-1.9, G-2, G-3.6, and G-4.3 for implementation of trail improvements. The Project has been designed with consideration of site-specific geotechnical recommendations to address hazardous geologic conditions, therefore incorporating the requirements of these measures to a more site-specific degree in the Project's grading plans. Thus, these four mitigation measures have been satisfied through appropriate trail design. Given site-specific conditions and design of the proposed trail, no significant impacts have been identified for the final trail alignment proposed under the Project. Therefore, mitigation is not required.

Residual Impacts

Residual impacts of the Project on geologic resources would remain *less than significant*.

4.7 Greenhouse Gas Emissions

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Existing Setting

Global climate change can be measured by changes in wind patterns, storms, precipitation, and temperature. Scientific consensus has identified that human-related emissions of greenhouse gases (GHGs) above natural levels is a significant contributor to global climate change. GHGs are substances that trap heat in the atmosphere and regulate the Earth's temperature, and include water vapor, CO₂, methane (CH₄), nitrous oxide (N₂O), ground level ozone, and fluorinated gases, such as chlorofluorocarbons (CFCs), hydrochlorofluorocarbons (HCFCs), and halons. The potential impacts of climate change include severe weather patterns, flooding, reduced quality and availability of water, sea level rise, and beach erosion. Primary activities associated with GHG emissions include transportation, utilities (e.g., power generation and transport), industry, manufacturing, agriculture, and residential. End-use sector sources of GHG emissions in California are as follows: transportation (37 percent), industry (23 percent), electricity generation (20 percent), agriculture and forestry (8 percent), residential (7 percent) and other (5 percent) (ARB 2015).

AB 32 is a California State Law that establishes a comprehensive program to reduce GHG emissions from all sources throughout the state. AB 32 requires CARB to develop regulations and market mechanisms to reduce California's GHG emissions to 1990 levels by 2020, representing a 25 percent reduction statewide, with mandatory caps beginning in 2012 for significant emissions sources. The 2015 Energy Report Card for the County of Los Angeles accounted for building energy, on-road transportation, stationary sources, solid waste, water conveyance, ports, off-road transportation, wastewater treatment, agriculture, and the Los Angeles World's Airport. Total existing emissions in 2010 were estimated at approximately 99,134,526 metric tons CO₂e (carbon dioxide equivalents). Building energy accounted for 39.2 percent of emissions, followed closely by transportation that represented 33.5 percent. Stationary sources, solid waste, water conveyance, and ports accounted for 19.7 percent, 4.4 percent, 1.1 percent, and 1.1 percent respectively. Off-road transportation, wastewater treatment, agriculture, and Los Angeles World's Airport each accounted for less than 1.0 percent of emissions. Total per capita GHG emissions from the County in 2010 were approximately 10.1 MT CO₂e per person, compared to 12.3 MT CO₂e per person for the state (Institute of the Environment and Sustainability 2015).

As mentioned in Section 4.3, *Air Quality*, the project site is located in the Basin. The major sources of GHG emissions in the City include motor vehicles and building energy needs, as well as the construction and maintenance of buildings, streets, and infrastructure.

Neither the City nor SCAQMD have approved a threshold of significance for GHG emissions. Section 15064.4 of the CEQA Guidelines was adopted to assist lead agencies in determining the significance of the impacts of GHGs. Consistent with developing practice, this section urges lead agencies to quantify GHG emissions of projects where possible. When no guidance exists under CEQA, the lead agency may look to and assess general compliance with comparable regulatory schemes. In its January 2008 *CEQA and Climate Change* white paper, the California Air Pollution Control Officers Association (CAPCOA) investigated a variety of analytical procedures and ranges of what would be considered significant for a project. Therein, CAPCOA suggested a possible quantitative threshold option that would capture 90 percent of GHG emissions from future discretionary development projects. According to CAPCOA, the “objective was to set the emission threshold low enough to capture a substantial fraction of future residential and nonresidential development that will be constructed to accommodate future statewide population and job growth, while setting the emission threshold high enough to exclude small development projects that will contribute a relatively small fraction of the cumulative statewide GHG emissions.” A 90 percent capture rate would “exclude the smallest proposed developments from potentially burdensome requirements ... to mitigate GHG emissions.”

Impact Discussion

The Certified EIR determined that the previously proposed improvements to Escondido Canyon Park would generate GHG emissions that would contribute to cumulative impacts of GHG emissions on global climate change. However, the contribution to cumulative GHG emissions resulting from those improvements to Escondido Canyon Park would not likely impede or conflict with the State’s ability to achieve the goals of AB 32; associated impacts would be less than significant.

a & b. Less than Significant. The Project would generate a nominal increase in GHG emissions over the short term from construction equipment. Proposed construction duration would take approximately 5 to 7 weeks. Emissions associated with construction activities would be nominal and would not exceed GHG emissions thresholds of significance, and therefore, would not cause a significant impact. Vehicles would be the primary emissions source during operation, as trail users travel to and from the site’s public parking area by car. However, Project operation is not anticipated to increase the use or visitation to the Escondido Falls Trail or Escondido Canyon Park, and the number of vehicle trips to and from the site’s public parking area would be materially the same as under existing conditions (see Section 4.15, *Recreation*, and Section 4.16, *Transportation and Traffic*). Vehicle-generated GHG emissions associated with vehicular travel during Project operation would not result in cumulatively considerable area source emissions (see Section 4.3, *Air Quality*). As construction emissions and operational emissions would be below the thresholds of significance, the Project would result in a *less than significant* impact.

Required Mitigation Measures

The Certified EIR identified no required MMs for implementation of trail alignment 4b. No significant impacts have been identified for the final trail alignment proposed under the Project. Therefore, mitigation is not necessary.

Residual Impacts

All impacts to GHG emissions and climate change associated with implementation of the Project would remain *less than significant*.

4.8 Hazards and Hazardous Materials

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) For a project located within an airport land use plan area or, where such a plan has not been adopted, within two miles of a public airport or a public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Existing Setting

The Project vicinity is characterized as undeveloped open space within SMMNRA, supporting steeply sloped areas along the coastal foothills of the Santa Monica Mountains. According to the State of California Department of Toxic Substances Control (DTSC) EnviroStor Database compliant with Government Code Section 65962.5, there are no current known hazardous waste clean-up sites within the vicinity of the proposed trail alignment. The closest hazardous material site is located approximately 2.5 miles southwest of the proposed trail alignment, the Malibu High

School Project site (30273 and 30215 Morning View Drive). This identified site results in no hazardous conditions that would affect the Project site.

The closest public school to the proposed trail alignment is Point Dume Elementary School, located approximately 2.0 miles to the southwest. The proposed trail is not located in the vicinity of any public or private airstrip or airport land use plan area. The nearest airport to the Project vicinity is Santa Monica Airport, located approximately 19.3 miles east, followed by Van Nuys Airport located approximately 20.6 miles to the northeast and Los Angeles International Airport located approximately 22.7 miles southeast; the vicinity of the Project is not located within any airport areas of influence.

According to the City's Emergency Operations Plan (EOP), in the Project vicinity, PCH (approximately 1.3 miles away) and Kanan Dume Road (approximately 2.6 miles away) are designated disaster routes (City of Malibu 2012). Designated disaster routes function as primary thoroughfares for the movement of emergency response traffic and access to critical facilities. Additionally, the City is located in operational disaster management area "B" as described in the 2012 *Los Angeles County Operational Area Emergency Response Plan* (OAERP) that gives guidance for emergencies including hazards and threats such as a major earthquake, hazardous material incident, wildland fire, flooding, mudslide, landslide, major air crash, civil unrest, transportation, and terrorism threat. The OAERP additionally outlines management, operations, planning, logistics, finance, recovery, and supporting documentation for the implementation of the plan (County of Los Angeles 2012).

The 2012 OAERP notes that the Santa Monica Mountains, which includes the City along its southern edge, are known for the "chaparral-urban interface" between often dry wildland vegetation and adjacent urban development. The mountains are subject to dry conditions during fire season, seasonal 40 to 50 mile per hour winds, and high temperatures of over 90 degrees that contribute to a much higher threat of wildfire year-round (County of Los Angeles 2012). The proposed trail alignment traverses areas of highly flammable native vegetation that could convey wildfires moving down toward the coast through areas of rural residential development which have experienced past wildfires. As a result, the Project vicinity is located within an area designated as a Fire Zone 4 – Very High Fire Hazard Severity Zone (VHFHSZ) by the California Department of Forestry and Fire Protection (CAL FIRE) and the Los Angeles County Fire Department (LACFD) County Forester. In addition to high fire hazards associated with wildland vegetation further inland, the Project vicinity supports steep slopes potentially prone to slope failure such as landslides and debris flows, especially in burned areas (see also, Section 4.6, *Geology and Soils*). Following burning of the area by the November 2018 Woolsey Fire, fire hazards at the Project site are considered to be significantly reduced over the following 5 or more years due to the loss of nearly all vegetation and burn material. Subsequently, potential for slope failure such as landslides and debris flows is significantly increased within the Project area (see Section 4.6, *Geology and Soils*).

While no fuel modification would be required for the Project, fuel modification zones within MRCA parks and adjacent development within the City 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. The fuel modification zones are modeled after LACFD's guidelines and customized for Escondido Canyon Park recreational uses and improvements. SMMC/MRCA currently implements the following practices, which would be continued with the Project to reduce potential trail-related risks associated with human-influenced wildfire ignitions:

- Enforcement of a No Smoking policy, punishable by a \$541 fine;

- Performance of annual brush clearance and fire prevention. Brush clearance needs are determined by conducting annual inspections following the natural drying of grasses and fine fuels, between the months of April and June, depending on precipitation during the winter and spring months;
- Based on the results of inspections, brush is cleared along trail corridors and vegetation is periodically trimmed;
- Dead and dying materials are routinely removed from trail alignments and plants that establish or are introduced to the trail alignment that are not on the approved plant list are periodically removed;
- All fuel maintenance activities are completed at least annually by June 15 of each year and more often as needed for fire safety;
- Park closures (including trails) in response to hazardous conditions (e.g., fire, landslide);
- Communication maintained with the LACFD, City of Los Angeles Fire Department, the Ventura County Fire Department, California State Parks, and NPS to promote cooperative fire prevention and response efforts;
- Employment of approximately 25 (amount increases during high fire season) trained wildland fire fighting personnel;
- Maintenance and deployment of its own firefighting equipment;
- Monitoring of park use visitation to protect park properties from potential risks associated with unauthorized and unattended visitors;
- Restricting aspects of site use through enforcement of park rules; and,
- Providing helicopter landing zones on certain park properties (SMMC/MRCA 2010).

Impact Discussion

The Certified EIR found that wind- or topography-driven wildfire burning under a north or northeastern (Santa Ana) wind downward through the canyons in the Santa Monica Mountains could result in an extreme wildland fire (SMMC/MRCA 2010). Power lines, which spark when there are high winds or when trees blow down on them, and arson, are the two most common causes for large fires in the Santa Monica Mountains (NPS 2018). Trail users were not identified as a cause of wildfires within the area.

The Certified EIR concluded that implementation of proposed recreational improvements at Escondido Canyon Park, including installation of trail alignment 4b, would result in less than significant impacts associated with hazardous materials and emergency response. Regarding fire hazards, the Certified EIR concluded that with implementation of park-specific fire protection plans impacts from fire hazards would be less than significant. The Certified EIR concluded that the trail network throughout Malibu would have the potential to expose visitors to the fire risk that already exists in the Santa Monica Mountains, but did not identify an increase in the potential for fire ignition sources from trail use.

a. Less than Significant. The proposed trail would not involve routine transport, use, or disposal of hazardous materials. Construction of the Project would involve use of small mechanized equipment and hand tools. Trail construction, maintenance, and repair would limit the use of diesel fuel for power equipment to the maximum extent feasible. During trail maintenance and repair, trail crews would typically perform ongoing maintenance using hand tools or power equipment such as chainsaws and weed whackers to keep vegetation overgrowth and fallen trees

from obstructing the trail. No herbicides would be used for vegetation management on trails. It is not anticipated that the Project would result in the use, storage, transportation or disposal of hazardous materials. As such, impacts would be *less than significant*.

b. Less than Significant. Construction of the proposed trail is not anticipated to threaten the operation or increase risk of upset from trail maintenance activities. As the Project is recreational in nature, no aspect of the proposed trail improvements would result in the routine handling of hazardous materials, nor would the Project result in the contamination of any public water supplies. Due to the nature of the trail and the distance from the nearest downslope developed areas, the Project would have no impact on these resources. As discussed above, compliance with federal, state, and local laws and regulations relating to transport, storage, and disposal of hazardous materials would minimize any potential for accidental release or upset of hazardous materials. Therefore, the potential for construction or operation of the Project to cause reasonably foreseeable upset and accidental release of hazardous materials into the environment is considered low and impacts would be *less than significant*.

c. Less than Significant. There are no existing or proposed schools within the Project vicinity. The nearest school facilities are at least two miles away from any construction or operational activities of the Project. Construction and operation of the Project would not create a hazard through the release of hazardous materials, routine use, transport, or handling of any notable quantities of hazardous materials. Further, as discussed in Section 4.3, *Air Quality*, construction of the Project would involve the use of diesel construction equipment, but the nearest school is located too far away to be affected by these emissions. Therefore, potential impacts associated with the handling or emission of hazardous materials within 0.25 mile of an existing or proposed school would be *less than significant*.

d. No Impact. The Project vicinity is not listed on any databases where releases of known hazardous materials have occurred, and is not listed as a site containing historical or existing underground storage tanks, gasoline stations, or dry cleaners. As discussed in the Existing Setting above, the closest hazardous material site is located approximately 2.5 miles southwest of the proposed trail alignment; the Malibu High School Project site (30273 and 30215 Morning View Drive). Project operations do not anticipate interaction with hazardous waste sites or production of materials that may require the use of hazardous waste site services. Therefore, *no impact* would occur.

e & f. No Impact. The project site is not located in an airport land use plan area or within the vicinity of a private airstrip. The Project does not involve placing people in proximity to aircraft operations, and no risks to life or property from airport operations could occur as a result of the Project. Therefore, there would be *no impact* to employees, customers, visitors, or workers from aircraft activities.

g. Less than Significant. The Project is not anticipated to interfere with any emergency response plan or fire evacuation plan. The segment of PCH within the Project vicinity is identified as an emergency access route which would serve nearby neighborhoods and park/trail visitors. Though the Project vicinity is situated in proximity to these streets, neither the construction nor the operation of the Project would require or result in long-term modifications to any of these roadways that would impact emergency traffic. Construction of the Project could temporarily interfere with local traffic as construction activities could require vehicles to temporarily stop along Murphy Way and Winding Way, such as when Bobcat® loaders or 4x4 ATVs are entering and exiting the trail. However, construction traffic would conform to all local access standards to allow adequate emergency access. Flagmen would be used to temporarily halt traffic along Murphy Way near the

proposed trailhead and along Winding Way near the public parking lot and resume flow when safe. The majority of construction activities for the Project would be confined to the proposed trail area, except for staging areas, which may require some construction activity in the Winding Way parking lot. The required use of flagmen during these periods would minimize traffic obstruction and delays and ensure that emergency vehicle access is maintained.

Further, the Project is not anticipated to increase vehicle trips in the Project vicinity, thus the Project would have less than significant impacts to area traffic (refer to Section 4.16, *Transportation and Traffic*). Additionally, options available to emergency vehicles such as using sirens to clear a path of travel or driving in opposite traffic lanes would reduce the effect of any incremental increases in traffic. Impacts would be *less than significant*.

h. Less than Significant. As mentioned above, the proposed trail alignment is located within a VHFHSZ. The Project could potentially increase potential for wildfires during construction maintenance activities and trail use; however, this potential is considered to be substantially reduced over the 3-5 years following the recent Woolsey Fire which burned nearly all of the Project site. During construction, the potential exists that operation of mechanized equipment such as bobcats or of power tools (e.g., chain saws) could cause sparks that could lead to accidental ignition of a wildfire. Further, regular use of trails located in high fire hazard areas which are present in the coastal sage scrub environment could incrementally increase the risk of accidental wildfire ignition by trail users; however, at present, potential for such to occur is considered low.

Construction and operation/maintenance of the Project would be in compliance with the goals, policies, and implementation measures and codes of the LACFD; the City General Plan Safety Element; the City LCP; the Public Works Department, Building Safety Division; and VHFHSZ building codes and requirements. Project operation would also be in compliance with the goals and implementation measures of the Certified EIR, which includes prevention, protection, suppression, and preplanning methods and measures that have been proven to reduce fire risk.

As discussed in Section 3.1, *Proposed Trail Design*, trail maintenance would be routinely performed by experienced trail crews, potentially supplemented by volunteers. MRCA staff would inspect the trail annually following the natural drying of grasses and fine fuels, between the months of April and June. Dead and dying materials would be removed from the trail alignment and plants that establish or are introduced to the trail alignment that are not on the approved plant list would be periodically removed. In addition, brush would be cleared along the trail corridor and vegetation would be trimmed.

MRCA rangers and park maintenance staff would identify any areas of maintenance deficiency. This information could then be used to modify the maintenance schedule for the proposed trail to redirect efforts or apply more work hours. During trail maintenance and repair, trail crews would typically perform ongoing maintenance using hand tools or power equipment such as chainsaws and weed whackers. In emergency situations such as wildfires or lost individuals, after-hours work by MRCA employees may be required. Larger maintenance activities and repairs such as fire clearance work may be subcontracted to private competitive contractors approved by the MRCA. MRCA maintenance personnel and the MRCA's fire division are also based at a section of King Gillette Ranch at 1670 Las Virgenes Canyon Road, Calabasas, approximately 10.5 miles from Escondido Canyon Park. Los Angeles County Fire Station No. 71 is located at 28722 Pacific Coast Highway, Malibu, approximately 1.1 miles from the public parking lot on East Winding Way and would provide emergency response in the event of fire or other emergency. Additionally, a resident member of the MRCA fire division currently lives in MRCA parkland in Carbon Canyon. A combination of MRCA ranger, maintenance, and fire division staff would provide enforcement,

patrol, and maintenance for the proposed trail. The MRCA also employs full-time, paid call, volunteer, and cadet trained wildland fire fighters certified to the same standards as the U.S. Forest Service and CAL FIRE. The MRCA deploys its own fire-fighting equipment, including four-wheel-drive Type 3 fire engines, Type 1 tactical water tenders, mobile command units, crew busses, and Type 4 fire patrol vehicles equipped with a minimum of 200 gallons of water. Wildland firefighters assess each park property and trail for fire risks and hazards, perform routine maintenance and other regulations when required, and respond to incidents of reported fires.

However, it must be noted that during extreme fire conditions such as those experienced during the November 2018 Woolsey Fire, there are no guarantees that fire would not occur in the Project area or that fire would not damage property or cause harm to persons or their property. Continued routine patrol and maintenance by MRCA Park Rangers and fire cadets, and continuing fuel reduction procedures currently implemented along SMMC/MRCA trails would reduce the potential for construction and operation of the proposed trail to result in a wildfire. Therefore, potential Project related impacts associated with fire hazards would be *less than significant*.

Required Mitigation Measures

The Certified EIR identified no required MMs for implementation of proposed recreational improvements at Escondido Canyon Park, including implementation of trail alignment 4b. No significant impacts have been identified for implementation of the final trail alignment proposed under the Project. Therefore, mitigation is not necessary.

Residual Impacts

With continued routine maintenance and the implementation of fuel management practices, residual impacts to the public and the environment from hazards and hazardous materials would be *less than significant*.

4.9 Hydrology and Water Quality

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Place within a 100-year flood hazard area structures that would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of a failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
j) Expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Existing Setting

Escondido Creek drains a 2,300-acre watershed designated in the City's General Plan Conservation Element as a "significant watershed", which contains significant riparian development of environmentally sensitive riparian or woodland habitat, drains an area greater than 1 square mile, and one from which runoff could impact particularly sensitive marine resource areas (City of Malibu 1995). Elevation within the watershed ranges from sea level to 2,244 feet, with slopes ranging from less than 10 percent to over 70 percent. The lower and middle sections of the canyon are intermittently developed with rural residential uses with greater amounts of grading and development occurring in the middle portion of the watershed. Over the years, the streambed and native vegetation have been generally preserved throughout much of the lower watershed (SMMC/MRCA 2010), but as a result of the Woolsey Fire, all or most vegetation within these drainages was burned. This vegetation is anticipated to regrow and recover over the next 5 or so years. It should be noted that winter rains will likely deposit added sediments over the next 1-3 years within these drainages from erosion on recently burned slopes.

Escondido Creek and its tributaries are generally oriented from north to south, with runoff and drainage flowing to the south towards the Pacific Ocean. Much of the development within the watershed consists of rural residential units and both paved and unpaved roadways, with the majority of the watershed consisting of natural areas. Runoff and sheet flows within the vicinity of the proposed trail drain to the east through a tributary canyon and south through Escondido Creek. Escondido Creek continues to the south from Escondido Canyon along the west side of Via Escondido Drive before crossing PCH and draining to the Pacific Ocean. Escondido Creek is an ephemeral stream fed by runoff from development to the north of Escondido Canyon Park or by natural rainfall. Annual precipitation in the area ranges from 15 to 40 inches (City of Malibu 2015). Due to the geography and proximity to the Pacific Ocean, much of the seasonal moisture consists of dew. No permanent surface water bodies exist within the watershed.

Impact Discussion

The Certified EIR concluded that construction of the improvements proposed in Escondido Canyon Park, including trail alignment 4b, would result in a potentially significant impact from increased erosion, sedimentation, potential release of hazardous materials, and the generation of pet and horse excrement which would adversely affect water quality. Incorporation of MMs HYD-1.1, HYD-1.2, requiring coverage under a National Pollutant Discharge Elimination System (NPDES) Permit and development of a Spill Prevention Control and Countermeasures Plan would reduce impacts to a less than significant level. MM HYD-8, requiring implementation of a pet and horse waste program, was also identified to reduce impacts to water quality. Implementation of the previously proposed improvements, including trail alignment 4b, were found not to substantially alter existing drainage patterns, deplete local groundwater resources, contribute runoff which would exceed existing or planned stormwater systems, nor expose people or structures to hazardous hydrologic occurrences. Associated impacts were therefore determined to be less than significant.

a. Less than Significant with Mitigation Incorporated. The Project would include the construction of a multi-use trail and the installation of several step-stone crossings through Escondido Creek and its tributaries for use by trail hikers, bicyclists, and equestrians. The Project would not involve any new discharges of runoff or stormwater, and Escondido Creek is not included on the Clean Water Action Section 303(d) list of impaired waters. During trail construction, exposed sediments could erode during storm events and cause localized siltation and sedimentation of Escondido Creek and/or its tributaries. However, as further discussed under Impact Discussion (c & d) below, Project construction would include implementation of erosion

control BMPs which would ensure potential for erosion, sedimentation, and runoff from construction and use of the trail are minimized. Project construction would result in disturbance of up to 0.54 acre, and is therefore not required to submit a notification demonstrating compliance with the requirements of the U.S. Environmental Protection Agency's (EPA's) NPDES Permit or the State Water Resources Control Board's (SWRCB) General Construction Storm Water Permit (Water Quality Order 99-08-DWQ). Implementation of Certified EIR MM HYD-1.1 is therefore not applicable to the Project. However, the Project would still be required to comply with the provisions of Section 401 of the Clean Water Act. In addition, as further discussed under Impact Discussion (f) below, Project construction has the potential to introduce pollutants to storm water flows from the use of mechanized equipment, resulting in the potential for contamination of local water bodies. **MM HYDRO-1**, requiring preparation and implementation of a Local SWPPP consistent with requirements of Chapter 17, Section 17.3.1 of the City LIP would ensure impacts from potential violation of water quality standards are reduced such that they would be *less than significant with mitigation*. Further, there would be no wastewater generated as a result of the Project, and Project implementation would not result in or contribute to a violation of wastewater discharge or treatment requirements.

b. No Impact. The Project would not require any new water demand, the supplies of which may include local groundwater supplies. Any water used during construction activities (e.g., soil watering and habitat restoration) would be imported to the project site (see Section 4.18, *Utilities and Service Systems*). The proposed trail would consist of natural unpaved dirt surfaces and would not contain any pavement or other impermeable surfaces which would adversely affect the rate of ground water recharge. Therefore, the Project would have *no impact* on local groundwater resources.

c & d. Less than Significant. The proposed trail alignment would traverse Escondido Creek and its tributary drainages in several locations. At-grade stream crossings would be proposed at these locations, and would consist of the placement of several large stones within the creek corridor as stepping stones to allow trail users to cross. In total, construction of the trail and the placement of stepping stones within the stream would affect up to an estimated 101 square feet (less than 0.01 ac) of USACE jurisdictional waters and 144 square feet (less than 0.01 ac) of CDFW jurisdictional waters. As described in Section 3.2, *Project Best Management Practices*, the Project would include a number of erosion control BMPs to reduce adverse effects to streams and drainages. For example, the Project would preserve existing vegetation where present and limit stone placement activities. Temporary silt fencing would be installed along the trail corridor where sheet flows could occur downhill from construction areas. To minimize erosion following construction, permanent rolling grade dips and biodegradable coir rolls would be constructed along the entire length of the proposed trail at intervals of approximately 200 feet. Despite potential for increased erosion or runoff following post-fire conditions, these measures would ensure that erosion from construction and use of the trail is minimized, and that there would be no substantial increase in the rate or amount of erosion or surface water runoff which would result in flooding of Escondido Creek or its tributaries on- or off-site. Although negligible compaction of the trail path would occur from repeat use, the Project would not permanently introduce impervious surface areas to the Escondido Canyon watershed that would increase the amount of runoff within the watershed which would increase erosion or siltation. Further, the purpose of the large stones at creek crossings and other operational erosion-control features is to maintain existing drainage patterns following completion of the trail. Therefore, impacts are considered *less than significant*.

e. Less than Significant. As discussed immediately above, implementation of the Project would not result in the introduction of impermeable surfaces within the Project area. The finished trail

grade and erosion-control features are designed to maintain the existing drainage pattern of the watershed and limit ponding on the trail. Stormwater would continue to percolate into the groundwater or flow into Escondido Creek as under existing conditions. There are no known capacity constraints within the Escondido Canyon watershed. Consequently, implementation of the Project would not exceed the capacity of any existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Therefore, Project impacts would be *less than significant*.

f. Less than Significant with Mitigation Incorporated. Trail construction would potentially expose the Project area to pollution from small construction vehicles. Some common sources of construction site pollution include spilled oil, fuel, and fluids from vehicles and mechanical equipment (e.g., chainsaws, Bobcat® loader, ATV); construction debris; sediment created by erosion; and materials such as used motor oil or antifreeze. During construction, use of mechanized equipment would be limited to only a short construction period. While the potential for spilled oil, fuel, and fluids from such equipment would be minor, there remains the potential for point-source discharge of pollutants as a result of spill of oils, fuels, or fluids. In such an event, pollutants would either discharge to the ground within the work area, and could either result in the contamination of soils as it washes downslope, or contaminate Escondido Creek and its tributaries as the pollutants are washed off the site. Consequently, construction of the Project would result in a potentially significant impact to water quality. **MM HYDRO-1**, requiring the development of and implementation of a Local SWPPP consistent with the requirements of Chapter 17, *Water Quality Protection Ordinance* of the City's LIP, would ensure that discharges from construction activities are appropriately managed to ensure the quality of water is not degraded. Further, compliance with City LIP Chapter 8.4, prohibiting earthmoving activities from occurring during the rainy season, would also apply to reduce potential for the degradation of water quality from erosion and sedimentation. Therefore, Project impacts would be *less than significant with mitigation*.

Once constructed, use of the trail would be limited to pedestrians, dog-walkers, equestrians, and bikers. As concluded in the Certified EIR, use of the trail by dog-walkers and equestrian riders would have the potential to result in the discharge of pollutants from pet and horse waste, which could degrade the quality of receiving waters. As such, impacts to surface waters from runoff or stormwater pollutants are considered potentially significant. Implementation of **MM HYDRO-2**, requiring implementation of a waste program including installation of pet waste dispensers and bags and relocation of horse waste would reduce impacts. This mitigation is adapted from MM HYD-1.2 of the Certified EIR to better address Project-specific impacts. Therefore, impacts from operation and use of the trail are considered to be *less than significant*.

g, h, i, & j. Less than Significant. The Project would involve the construction of a new unpaved trail and would not involve the construction of any structures, housing or otherwise. Under pre-fire conditions, the Project is not located within an area largely susceptible to flooding, seiche, tsunami, mudflow, or other hydrologic hazard; the site is not located in a 100-year floodplain, nor in proximity to dams or levees. However, given post-fire conditions and the increased susceptibility to debris flows in areas of recent intense burn and steep slopes, potential for hydrologically-induced slope failure is considered to increase during the first few years of Project construction and operation. To reduce threat to trail users, MRCA would continue to monitor for moderate to extreme rainfall and potential for hydrologic hazards events within the Woolsey Fire burn area, taking measures to warn trail goers of such hazards and close the trail to the public in the event of increased risk to such hazards (MRCA Ordinance § 2.3, *Rain Closure*).

While segments of the trail may be located along or cross Escondido Canyon Creek and its tributary drainages, the area has been identified as being subject to only minimal flooding and low probability for substantial flood hazard during large storm events (FEMA 2018). Again, in the event of hazardous creek flooding or washout of the trail, MRCA staff would close the trail to public use so as to avoid exposure of persons to flood hazards. Additionally, even when considering worst-case assumptions for sea level rise, the Project would remain outside of projected mapped potential sea level rise flooding areas. As such, the Project would have a *less than significant* impact with regard to the placement of structures or exposure of people to hydrologic hazards.

Required Mitigation Measures

The Certified EIR identified MM HYD-1.1, HYD-1.2, and HYD-8 for implementation of proposed improvements to address impacts from discharge of pollutants and degradation of water quality. The Project incorporates these MMs, as modified to reflect site-specific impacts of the final trail alignment and to better mitigate associated impacts. The SWPPP requirements of Certified EIR MM HYD-1.1 and spill prevention control and countermeasure requirements of Certified EIR MM HYD-1.2 are incorporated into the Project-specific **MM HYDRO-1** below, with minor revisions to reflect a project requiring less than one acre of ground disturbance. The management of pet waste required by Certified EIR MM HYD-8 is incorporated into Project **MM HYDRO-2** below. The following MMs would reduce the Project's impacts to hydrology and water quality to a *less than significant* level.

MM HYDRO-1 Storm Water Pollution Prevention Plan. *MRCA shall be responsible for ensuring that construction activities comply with the applicable stormwater regulations, including development of a Local Stormwater Pollution Prevention Plan (SWPPP). The Local SWPPP must be prepared in accordance with the guidelines adopted by the State Water Resources Control Board (SWRCB) covering all phases of grading and construction activities and including all requirements of the City's Water Quality Protection Ordinance (Local Implementation Plan [LIP] Chapter 17). Special precautions and additional measures may be required for work in construction areas identified as having denuded soils or having been severely damaged by wildfire. The Local SWPPP must be prepared and submitted, along with final grading and trail construction plans, to the City prior to the issuance of grading permits. The Local SWPPP shall include a Spill Prevention Control and Countermeasures Plan outlining the following measures:*

- *The Applicant shall retain appropriate spill control and clean up materials (e.g., oil absorbent pads) onsite in case spills occur.*
- *The Applicant shall confine all trash and debris (excluding vegetative debris) in appropriate enclosed bins and dispose of the trash and debris at an approved site at least weekly.*
- *All construction vehicles and equipment used for trail construction shall be well maintained and checked daily for fuel, oil, and hydraulic fluid leaks or other problems that could result in spills of toxic materials.*
- *The Applicant shall designate a staging area for equipment and vehicle fueling and storage at least 100 feet from waterways, in a location where fluids or accidental discharges cannot flow into waterways.*
- *All vehicle fueling and maintenance activity shall occur at least 100 feet away from waterways and in designated staging areas, unless a requested exception on a case-by-case basis granted by prior written approval has*

been obtained from the Los Angeles Regional Water Quality Control Board staff.

Plan Requirements and Timing: The Local SWPPP must be prepared by a licensed civil engineer and incorporate all appropriate City-approved best-management practices (BMPs) necessary to mitigate short-term construction impacts and control the discharge of pollutants from the project site. The MRCA shall submit the Local SWPPP to City staff for review and approval prior to the issuance of a grading permit.

Monitoring: City staff must review the documentation prior to the issuance of a grading permit.

MM HYDRO-2 Pet Waste Management Program. *MRCA shall be required to implement a pet waste program, which would entail installing pet waste dispensers and bags as well as posting signage in both English and Spanish at the existing parking lot. MRCA shall be required to refill the dispensers on a routine basis. Signage shall include verbiage addressing the importance of proper disposal of pet waste as well as stating the jurisdictional authority's ordinance section and fines associated with failure to comply with the ordinance. Offenders caught not using the bags or leaving used bags onsite shall be fined. If horse waste is deposited less than 50 feet from the bottom of the low flow channel where the trail crosses a drainage, during patrols and maintenance activities, MRCA staff will move the waste to a distance greater than 50 feet to allow for natural decomposition away from the drainage course.*

Plan Requirements and Timing: The above mitigation shall be integrated into the trail's signage program. Signage shall be installed prior to operation of the proposed trail.

Monitoring: During operation of the trail, MRCA staff shall be responsible for implementing the Pet Waste Management Program.

Residual Impacts

With implementation of **MM HYDRO-1** and **MM HYDRO-2**, requiring the development of and implementation of a Local SWPPP consistent with the requirements of Chapter 17, *Water Quality Protection Ordinance* of the City LIP and a pet waste program, would ensure that discharges from construction and operation of the trail are appropriately managed to ensure Project impacts to hydrology and water quality would be *less than significant*.

4.10 Land Use

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with any applicable land use plan, policy or regulation of an agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal program or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Existing Setting

The proposed trail would be located on two undeveloped parcels within and adjacent to Escondido Canyon Park, both of which are owned and managed by the MRCA. These parcels (APN 4467-003-900 and APN 4460-002-902) are designated and zoned Rural Residential – 10 acre minimum lot area – (RR10) and Public Open Space (POS), respectively, under the City's General Plan and LCP. The Project is surrounded by undeveloped lands within the County of Los Angeles to the north, public park lands of Escondido Canyon Park and rural residential development to the east, both vacant and developed rural residential lots within the City to the south, and the Rancho Del Cielo in the County and vacant City lands to the west. Further to the west is Ramirez Canyon Park and several parcels owned and managed by SMMC and MRCA. Access to the proposed trail would be limited to pedestrian access between the existing hiking and riding easements over Murphy Way and East Winding Way and the Winding Way Trail parking lot located approximately 1.4 miles to the south along PCH. There are no structures or development located on or immediately adjacent to the proposed trail alignment, and no structures or existing infrastructure (roads, utilities, trails, etc.) are proposed to be altered by the Project.

Impact Discussion

The Certified EIR concluded that implementation of the proposed improvements in Escondido Canyon Park, including trail alignment 4b, would not divide an established community and would be compatible with existing surrounding uses, having a less than significant impact.

The Certified EIR concluded that improvements proposed at Escondido Canyon Park, including trail alignment 4b, were identified as being consistent with applicable plans and policies, and associated impacts from these improvements were determined to be less than significant and no mitigation was required to reduce impacts from these improvements.

The Certified EIR concluded that no adopted Habitat Conservation Plans, Natural Community Conservation Plans, or other approved habitat conservation plans exist which would regulate the area. Associated impacts were therefore considered to be less than significant.

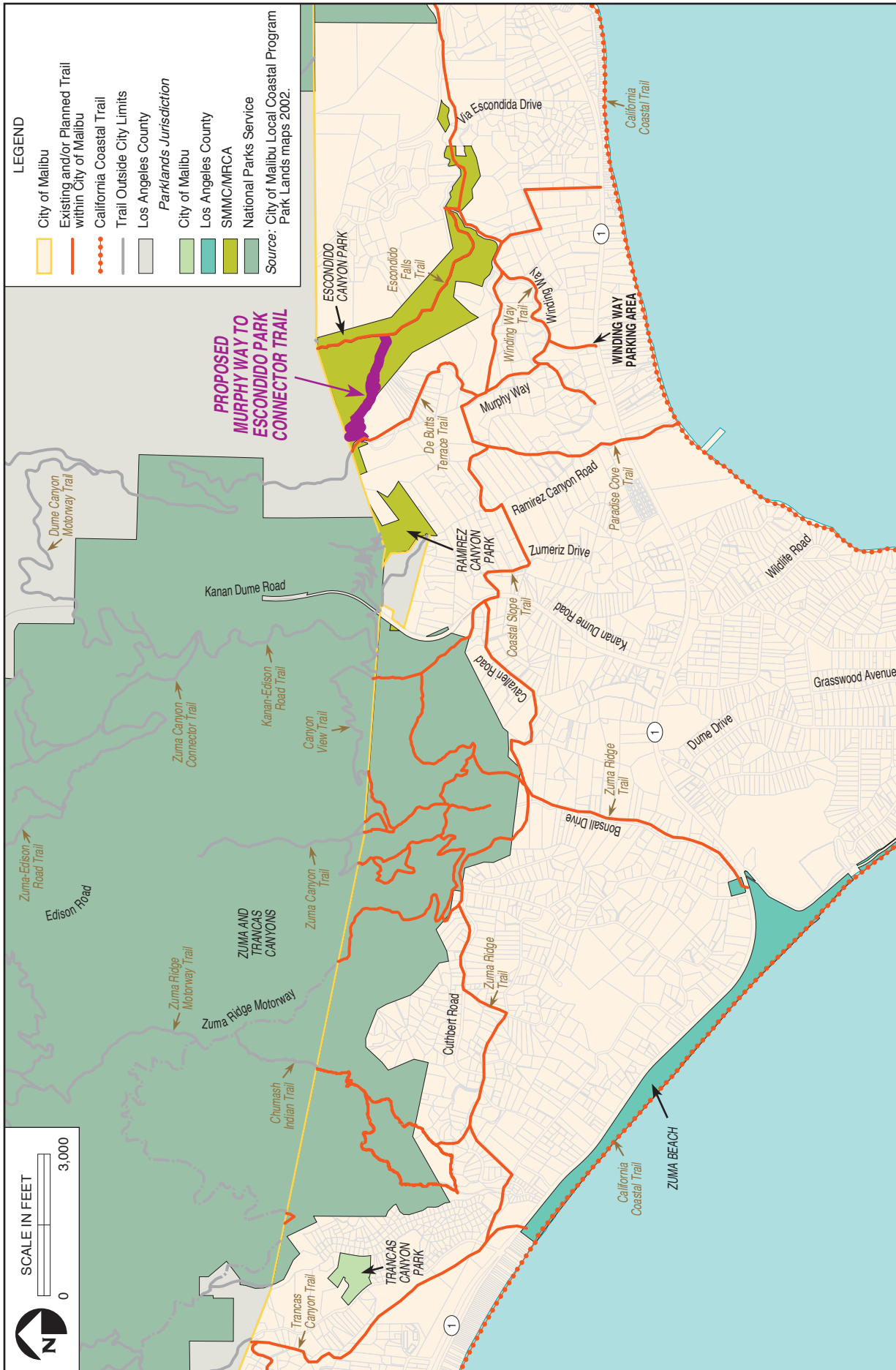


FIGURE 6

City of Malibu Parklands and Trails

To determine if the Project would be compliant with applicable policies and regulations from elements of the City's General Plan, LCP, and the California Coastal Act, a supplemental analysis of the Project's consistency with these land use plans and policies has been provided as the Land Use Policies and Consistency Analysis included as Appendix E.

a. No Impact. The Project would construct a multi-use trail on MRCA-owned land within the northern City boundary, adjacent to undeveloped public County land and the existing Escondido Canyon Park. The Project would not physically divide an established community and would have *no impact*.

b. Less than Significant with Mitigation Incorporated. The Project's consistency with applicable policies of the City's LCP Land Use Plan (LUP) and the California Coastal Act are evaluated in Appendix E. As identified therein, **MM BIO-1** through **MM BIO-7** would make the Project consistent with LUP and California Coastal Act policies to preserve protected plant and animal species within a designated ESHA. With mandatory compliance with the City LIP Chapters 8.4 and 11, requiring seasonal restrictions on grading and immediate cease work in the event of discovery of unanticipated resources, respectively, the Project would be consistent with all other applicable plans, policies, and regulations. Therefore, Project impacts would be *less than significant with mitigation*.

General Plan Land Use Compatibility

Although the dedication of the trail easement on Murphy Way preceded construction of many of the homes along Murphy Way, concern from residents over the perceived effects of trail usage on rural residential neighborhoods is noted in the City's General Plan discussion of the Winding Way – De Butt's Terrace (Murphy Way) Neighborhood. Appendix A, Section 1.6.10, of the General Plan Land Use Element summarizes adjacent residents' concern that the acquisition of lands for recreational uses provides "unlimited public access for hikers, bikers, campers, and gangs", that "[s]ecurity and liability have become a problem and the fire danger has increased"; and that the sensitive nature of the area, is perceived as not being able to support this increased level of use. Some of the concerns that have been expressed by residents on past trail projects include the potential for occasional trespass by recreationists, knocking on resident's doors as recreationists request aid or assistance (e.g., use of restrooms, use of a telephone, requests for water), use of resident trash receptacles, and disposal of litter along the trail or on private residential properties.

The proposed trail, while creating a significant public recreation amenity, has the potential to increase concern from the residents along Murphy Way about a trail's perceived effects on security and liability, and fire. LCP LUP Policies 2.1–2.24 (which incorporate City Resolution No. 07-04) include goals and policies to implement a connected network of trails throughout the City without violating private property rights.

While the Project has the potential to introduce some new pedestrian traffic along Murphy Way, many of the homes along Murphy Way are gated or secured, and access to the properties is physically restricted. As such, it is not anticipated that any limited increase in the pedestrian use of Murphy Way would substantially increase exposure of residents to disturbance by recreationists. Each of the perceived concerns identified in the General Plan description of the Winding Way – De Butt's Terrace (Murphy Way) Neighborhood is more fully discussed in Section 4.8, *Hazards and Hazardous Materials*, Section 4.12, *Noise*, Section 4.14, *Public Safety*, and Section 4.16, *Transportation*. As discussed therein, implementation of the Project would not increase incidents of crime or the amount of litter, result in prolonged audible noise at adjacent

residents, or increase fire hazard along the trail alignment. Thus, the Project would not subsequently result in a change to the historic character of the surrounding neighborhoods. Therefore, the Project would not result in a realization of the perceived concerns by the residents of the Winding Way – De Butt’s Terrace (Murphy Way) Neighborhood and impacts are *less than significant*.

While no mitigation is required to reduce impacts associated with the potential degradation of neighborhood quality of life, given the past concerns raised by adjacent residences, **MM NOI-1** requires that signs be posted at the trail terminus at Murphy Way, along the pedestrian access route along Murphy Way, and at the existing parking lot instructing recreationists to be respectful of adjacent residences. This mitigation would help to alleviate some of the concerns of adjacent residents and homeowners relating to quality of life, maintain the rural residential nature of the neighborhood, and reduce occurrences of nuisance to residents of Murphy Way. It is important to note that MRCA-employed Park Rangers patrol all MRCA properties and trails and have authority to issue citations for violation of any MRCA rules and regulations, which include disruptive conduct or generation of unreasonable noise.

c. Less than Significant Impact. The Project is not located within any approved local, regional, or state Habitat Conservation Plan or Community Conservation Plan. Plans and policies contained in the City General Plan and LCP are specifically protective of ESHA and sensitive resources in the Project vicinity. Impacts to ESHA and sensitive biological resources are addressed in Section 4.4, *Biological Resources*, above and consistency with these policies are analyzed in Appendix E. However, aside from these plans and policies, there are no adopted habitat conservation plans that would apply. Therefore, a *less than significant* impact would occur with respect to consistency with local, regional, or state adopted habitat conservation plans.

Required Mitigation Measures

The Certified EIR identified no required MMs for implementation of Escondido Canyon Park improvements or trail alignment 4b. However, the following site-specific MMs are identified to ensure the Project remains consistent with applicable land use plans, policies, and regulations and reduce impacts to a less than significant level:

MM AQ-1.1 would apply to ensure the Project remains consistent with applicable policies relating to the protection of air quality.

MM AQ-1.2 would apply to ensure the Project remains consistent with applicable policies relating to the protection of air quality.

MM AQ-2 would apply to ensure the Project remains consistent with applicable policies relating to the protection of air quality.

MM BIO-1 would apply to ensure the Project remains consistent with applicable policies relating to the protection of sensitive biological resources.

MM BIO-2 would apply to ensure the Project remains consistent with applicable policies relating to the protection of sensitive biological resources.

MM BIO-3 would apply to ensure the Project remains consistent with applicable policies relating to the protection of sensitive biological resources.

MM BIO-4 would apply to ensure the Project remains consistent with applicable policies relating to the protection of sensitive biological resources.

MM BIO-5 would apply to ensure the Project remains consistent with applicable policies relating to the protection of sensitive biological resources.

MM BIO-6 would apply to ensure the Project remains consistent with applicable policies relating to the protection of sensitive biological resources.

MM BIO-7 would apply to ensure the Project remains consistent with applicable policies relating to the protection of sensitive biological resources.

MM CULT-1 would apply to ensure the Project remains consistent with applicable policies relating to the protection of undiscovered sensitive archaeological resources.

MM CULT-2 would apply to ensure the Project remains consistent with applicable policies relating to the protection of undiscovered sensitive archaeological resources.

MM CULT-3 would apply to ensure the Project remains consistent with applicable policies relating to the protection of undiscovered sensitive archeological resources.

MM HYDRO-1 would apply to ensure the Project remains consistent with applicable policies relating to the protection of water quality.

MM HYRDO-2 would apply to ensure the Project remains consistent with applicable policies relating to the protection of water quality.

MM NOI-1 would apply to ensure that the Project remains consistent with applicable policies relating to the noise environment.

MM TRAF-1 would apply to ensure that the Project remains consistent with applicable policies relating to the traffic and transportation.

MM TRAF-2 would apply to ensure that the Project remains consistent with applicable policies relating to the traffic and transportation.

Residual Impacts

With implementation of required mitigations, the Project would be consistent with all applicable policies and regulations of the City's LCP and the California Coastal Act. Consequently, residual impacts associated with land use and planning policies would be *less than significant*.

4.11 Mineral Resources

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Existing Setting

The State Division of Mines and Geology has not mapped any mineral resources in the City (City of Malibu 1995). No mineral resource recovery sites have been established or considered on the properties or in the surrounding vicinity of the proposed trail route (California Department of Conservation 2016). Additionally, no oil or gas wells are located near or within the project site. The nearest wells to the Project area are located approximately 2.5 miles to the southwest and are both plugged and abandoned (Division of Oil, Gas & Geothermal Resources 2018).

Impact Discussion

The Certified EIR determined that there would be no impacts related to known mineral resources because there are no known mineral resources or areas currently being mined for any such resources in the Malibu area.

a & b. No Impact. No known mineral resources are located on the site or in the area surrounding the Project. The Project would not result in the loss of availability of a known or locally important mineral resource. Further, the Project vicinity does not contain active aggregate or petroleum mining operations, and given the nature of the project vicinity, no such operations would be explored. Therefore, there would be *no impact* to mineral resources.

Required Mitigation Measures

The Certified EIR identified no required MMs for implementation of trail alignment 4b. No significant impacts have been identified for the Project. Therefore, mitigation is not necessary.

Residual Impacts

Implementation of the Project would result in *no impact* with regard to mineral resources.

4.12 Noise

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance or of applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan area or, where such a plan has not been adopted, within two miles of a public airport or a public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Existing Setting

Noise is typically defined as unwanted sound that interferes with normal activities or otherwise diminishes the quality of the environment. Prolonged exposure to high levels of noise is known to have several adverse effects on people, including hearing loss, interference with communications and sleep, physiological responses, and annoyance. The noise environment includes background noise generated from both near and distant noise sources, as well as the sound from individual local sources. The primary source of noise in the Project vicinity is periodic vehicle traffic on Murphy Way, and pedestrian noise along private residential streets and existing trails.

The standard unit of measurement of the loudness of sound is the Decibel (dB). Since the human ear is not equally sensitive to sound at all frequencies, a special frequency-dependent rating scale has been devised to relate noise to human sensitivity. The A-weighted decibel scale (dBA) performs this compensation by discriminating against frequencies in a manner approximating the sensitivity of the human ear. Decibels are based on the logarithmic scale. The logarithmic scale compresses the wide range in sound pressure levels to a more useable range of numbers in a manner similar to the way that the Richter scale is used to measure earthquakes. In terms of human response to noise, studies have indicated that a noise level increase of 3 dBA is barely perceptible to most people, a 5 dBA increase is readily noticeable, and a difference of 10 dBA would be perceived as a doubling of loudness.

Noise levels diminish rapidly with distance from construction areas, at a rate of approximately 6 dBA per doubling of distance from the reference distance (i.e., 50 feet) as equipment is generally stationary or confined to specific areas during construction. For example, a noise level of 86 dBA measured at 50 feet from the noise source to the receptor would reduce to 80 dBA at 100 feet from the source to the receptor, and reduce by another 6 dBA to 74 dBA at 200 feet from the source to the receptor. The noise levels from construction at the off-site sensitive uses can be determined with the following equation from the Harris Miller Miller & Hanson Inc. Transit Noise and Vibration Impact Assessment, Final Report:

$$L_{eq} = L_{eq} \text{ at 50 feet} - 20 \text{ Log}(D/50)$$

Where L_{eq} = noise level of noise source, D = distance from the noise source to the receptor, L_{eq} at 50 feet = noise level of source at 50 feet.

The nearest noise sensitive land use to the proposed trail are the single-family residences located along Murphy Way, the nearest of which is located approximately 680 feet downslope and south from the western trail terminus. The nearest location where construction equipment would be used for grading and trail construction activities would occur at the same distance, 680 feet, from and upslope from this sensitive receptor. From the portion of the trail connecting to the Escondido Falls Trail, the nearest sensitive receptor is located approximately 1,140 feet upslope and to the southwest. No commercial or institutional uses are located close enough to the trail alignment to experience noise associated with construction or operation of the proposed trail.

The City's Noise Ordinance (Municipal Code Chapter 8.24) dictates the working hours of construction activities as indicated in Table 4.

Table 4. Allowable Construction Hours

Days	Allowable Construction Hours
Monday-Friday	7:00 A.M. – 7:00 P.M.
Saturdays	8:00 A.M. – 5:00 P.M.
Sundays and Holidays	Not permitted

Source: City of Malibu 2018a.

Impact Discussion

The Certified EIR concluded that impacts from construction of improvements at Escondido Canyon Park would result in potentially significant noise impacts; though impacts were primarily associated with construction of other previously proposed improvements within Escondido Canyon Park, not including trail alignment 4b. The Certified EIR identified MMs N-1.1 through N-1.10, which include requirements on limitations on use of construction equipment, use of sound blankets and noise-control devices, and staging of materials and equipment away from sensitive uses, that reduce impacts to a less than significant level. While the Certified EIR identified potential impacts from recreational use of the previously proposed recreational amenities, the Certified EIR did not specifically address operational noise impacts from use of proposed recreational trail improvements, including trail alignment 4b.

a & c. Less than Significant. Given the nature of the existing noise environment and recreational activities associated with trail use, implementation of the Project would not result in the generation

of long-term noise levels which would exceed City thresholds. For the purposes of this analysis, the Project's construction activities are assumed to result in significant impacts if they increase ambient noise levels above 75 dBA for residential uses, (considered by the City to be the "maximum exterior noise limits for non-transportation sources."), unless compliance is technically infeasible.⁷ A negligible increase in ambient noise is anticipated to result from recreational use of the proposed trail. Implementation of the proposed trail, which would provide a secondary access route to and from the Escondido Falls Trail, would alleviate some congestion of recreational trail users along East Winding Way, diverting some pedestrian traffic to Murphy Way. This would have the effect of reducing trail-user-generated noise levels along East Winding Way while increasing noise sources along Murphy Way. Noise typically generated by recreational users (e.g., conversations between trail users, use of portable sound speakers, bicycle noise, etc.) is considered to pose a temporary nuisance limited only to the amount of time it takes for trail users to pass a residence rather than a significant increase in noise which might disrupt adjacent residential uses. Noise from trail users would have a negligible effect on the ambient noise environment. For example, at a distance of 50 feet from the noise source, a typical conversation generates noise of approximately 65 dBA. Therefore, noise would be below the thresholds of significance even at a distance of only 50 feet. As such, impacts of the Project are considered *less than significant*.

While no mitigation is required to reduce impacts associated with construction and operational noise generated by the Project, given the expressed concerns of adjacent residences, **MM NOI-1** requires that additional signage be posted where the park hours of operation are displayed; these signs would instruct visitors to be respectful of adjacent residences. This MM would help to alleviate some concerns of adjacent residents, maintain the rural residential nature of the neighborhood, and reduce nuisance noise generated along Murphy Way.

b. No Impact. Typically, groundborne vibration is of concern in urban areas when heavy construction (e.g., pile driving, major excavation) immediately abuts sensitive uses such as residences. Groundborne vibration typically does not travel far and intensity of vibration is affected by soil type, ground profile, distance to the receptor and the construction characteristics of the receptor building. While groundborne vibration is of much less concern in open space areas, the Caltrans Transportation and Construction Vibration Guidance Manual provides a method to estimate potential effects from Project activities based on common human response to conditions and construction equipment. Table 5 indicates vibration levels at which humans would be affected. Table 6 identifies anticipated vibration velocity levels (in/sec) for standard types of construction equipment based on the previously established 400-foot distance to the nearest sensitive residential receptor.

The Project would not expose neighboring sensitive receptors to excessive groundborne vibration or groundborne noise levels since construction associated with the trail improvements would be limited to grading activities involving small mechanized equipment (trail dozer, Bobcat® loader, and ATV) and manual labor using hand tools, which are not considered sources of groundborne vibration or groundborne noise. Consequently, there would be *no impact* associated with groundborne noise and vibration on sensitive receptors in the area.

⁷ Technically infeasible is defined as noise limitations that cannot be attained during use of the equipment even with the use of mufflers, shields, sound barriers and/or other noise reduction techniques.

Table 5. Caltrans Vibration Annoyance Potential Criteria

Human Response Condition	Maximum Vibration Level (in/sec) for Transient Sources	Maximum Vibration Level (in/sec) for Continuous/Frequent Intermittent Sources
Barely perceptible	0.04	0.01
Distinctly perceptible	0.25	0.04
Strongly perceptible	0.9	0.10
Severe	2.0	0.4

Source: Caltrans, 2013. *Transportation and Construction Vibration Guidance Manual* – Table 20.

Table 6. Vibration Source Levels for Construction Equipment

Construction Equipment	Vibration Level (in/sec) at 25 feet	Vibration Level (in/sec) at 50 feet	Vibration Level (in/sec) at 100 feet
Loaded Trucks	0.076	0.035	0.017
Jackhammer	0.035	0.016	0.008
Pile Driver (Impact)	0.644	0.297	0.137

Source: Caltrans, 2013. *Transportation and Construction Vibration Guidance Manual* – Table 18.

d. Less than Significant. Construction activities would occur along the proposed trail and associated access routes (East Winding Way and Murphy Way) and within the open space areas of Escondido Canyon Park. During the proposed 5- to 7-week construction period, construction noise would be generated from grading activities as a result of use of small mechanized equipment. Construction noise would primarily be limited to trail cut and grading activities when small mechanized equipment would be utilized. However, additional sources of noise would occur from general truck movement and some minor noise associated with manual trail construction activities. The analysis of construction-related noise impacts is qualitative in nature, discussing the potential range of construction-related impacts that could potentially occur from the project site. Construction noise levels for the Project are evaluated using data published by the U.S. Department of Transportation, as indicated in Table 7.

Table 7. Noise Ranges of Typical Trail Construction Equipment

Construction Equipment	Noise Levels in dBA L_{eq} at 50 Feet
Trucks	82–95
Tractor	84
Large Dozer	82–85
Generators	71–83
Compressors	75–87
Pickup Truck (ATV)	55–75

Note: Machinery equipped with noise control devices or other noise-reducing design features does not generate the same level of noise emissions as that shown in this table.

Source: U.S. Department of Transportation 2006.

Noise associated with the operation of mechanized equipment is conservatively assumed to equal that of a large dozer, although only small mechanized equipment would be utilized during trail construction. A large dozer would generate a noise level of 85 dBA measured 50 feet from the dozer. Using this assumption, the loudest trail construction activities occurring within 680 feet of the nearest residents along Murphy Way would be exposed to peak noise levels of approximately 62 dBA during construction of the trail when small mechanical equipment is operated closest to the residence. Smaller mechanized construction equipment, garden tools (weed-whacker, blower, mower, etc.) or hand tools would likely be utilized where construction or improvement is required. However, use of such equipment would be limited to much shorter duration and are not considered to significantly adversely affect nearby residences. Further, as equipment moves away from the residence, the noise levels would decline to the point where they would not be audible at the residence. Visitors in Escondido Canyon Park and along the Escondido Falls Trail may be exposed to noise from construction activities of up to 85 dBA. However, visitors would quickly travel away from the noise source and only be temporarily exposed to construction noise during a typical visit. The City has not established noise thresholds for recreational users. Nonetheless, impacts to recreational users are considered to be *less than significant*. Further, all noise generated by the Project would be limited to the City's allowable construction hours. Given that trail construction activities would generate noise well below the City's threshold of 75 dBA at nearby residences, temporary trail construction noise would not exceed the City's thresholds for significance for construction-related noise. Therefore, construction-related noise are considered *less than significant*.

e & f. No Impact. The Project is not located within the proximity of an airport land use zone or within two miles of a public airport, or private airstrip. As such, the Project would not result in the exposure of recreational trail users to excessive airport noise, nor would the Project conflict with an adopted Airport Land Use Plan. Therefore, implementation of the Project would have *no impact* with regard to airport noise.

Required Mitigation Measures

The Certified EIR identified no required MMs for implementation of trail alignment 4b that would apply to the Project. Although no significant impacts have been identified for implementation of the final trail alignment proposed under the Project, the following mitigation is identified to address

neighbor concern over the perceived potential for trail users to expose residents to increased noise levels:

MM NOI-1 **Noise Signage.** *The MRCA shall place additional signage at all locations where the park's hours of operation are posted that instruct visitors to be respectful of residences.*

Plan Requirements and Timing: All signage shall be included on the trail design plans submitted to the City for approval. All signage shall be installed prior to opening the proposed trail alignment for public use.

Monitoring: MRCA shall conduct periodic inspections to ensure that all signage is properly maintained and free from visual obstruction.

Residual Impact

All impacts to noise associated within implementation of the Project would remain *less than significant*.

4.13 Population and Housing

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Induce substantial population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Existing Setting

The project site is located in a rural residential area and would involve the construction of a trail on two undeveloped parcels currently designated and zoned for rural residential development and public open space.

Impact Discussion

The Certified EIR concluded that implementation of proposed improvements, including construction of trail alignment 4b, would not result in impacts associated with populations and housing.

a, b, & c. No impact. The Project does not include the construction of any new structures, residential or otherwise, and does not involve the demolition of any structures. Therefore, the Project would not directly induce population or displace any amount of existing housing or persons which would necessitate the construction of replacement housing elsewhere. As such, *no impact* to local and/or regional population and housing would occur.

Required Mitigation Measures

The Certified EIR identified no required MMs for implementation of proposed recreational improvements. No significant impacts have been identified for implementation of the final trail alignment proposed under the Project. Therefore, mitigation is not necessary.

Residual Impacts

Implementation of the Project would result in *no impact* with regard to population and housing.

4.14 Public Services

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
a) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Existing Setting

MRCA employs wildland fire fighters, who in coordination with the California State Parks, NPS, CAL FIRE, and LACFD, provide fire protection services for MRCA-owned parklands and open space within the Santa Monica Mountains. LACFD provides emergency medical services for the City and surrounding areas. The properties are located within an area described by CAL FIRE as a VHFHSZ subject to local responsibility. Being at the northern City boundary, the properties are also adjacent to VHFHSZ lands within the State Responsibility Area (CAL FIRE 2007, 2011).

Law enforcement for MRCA-owned parklands within the Santa Monica Mountains is provided by MRCA-employed Park Rangers, who are California Peace Officers and Public Officers, currently stationed at ranger residences at King Gillette Ranch and Charmlee Wilderness Park. Police services for the City are provided by contract with the Los Angeles County Sheriff's Department from the Malibu/Lost Hills Sheriff's Station. In addition, the City's Volunteers on Patrol program allows civilian volunteers to assist the Sheriff's Department in serving and protecting the local community by acting as the "eyes and ears" of the Sheriff's Department. The Volunteers on Patrol members provide assistance in identifying suspicious activities, crimes in progress, or other dangerous circumstances, and notifying the authorities, as well as helping to enforce the City's parking regulations (City of Malibu 2018b).

Within the vicinity of Escondido Canyon Park and along the Winding Way Trail, City residents have expressed concern regarding safety, security, and excessive amounts of graffiti and littering along East Winding Way and the Escondido Falls Trail. During three visits to the proposed trail alignment and Escondido Canyon Park in spring of 2018, Wood staff observed a general absence of trash and debris along the Escondido Falls Trail, while tree carvings were intermittently observed on mature trees. No graffiti was observed during these site visits.

The nearest public school to the project site is Point Dume Elementary School, located approximately 2.0 miles to the southwest. The nearest parks to the project site are Escondido Canyon Park and Ramirez Canyon Park, as further described in Section 4.15, *Recreation*.

Impact Discussion

The Certified EIR concluded that no impacts would occur with respect to schools and libraries from implementation of proposed recreational improvements. However, the Certified EIR identified a potentially significant impact that would result from additional demand for fire protection. MM PS-1, prohibiting construction activities on designated Red Flag Days, was identified and required to reduce impacts to a less than significant level. Impacts to police services were determined to be less than significant.

a & b. Less than Significant. Given the recreational nature of the proposed trail improvements, implementation of the Project would not induce growth or result in the generation of significant additional demand for police or fire protection services within the area. Fire hazard associated with construction activities would be limited due to the short duration of construction activities and operation of only a few mechanized pieces of equipment. Implementation of the Project is not anticipated to increase visitation to MRCA park facilities. MRCA Park Rangers and fire protection staff, in coordination with local jurisdictions, would be capable of ensuring adequate service for the proposed trail and any other affected MRCA facilities.

As discussed in greater detail in Section 4.8, *Hazards and Hazardous Materials*, MRCA currently implements a series of measures to reduce trail-related risks associated with human-influenced wildfire ignition, such as a no smoking policy punishable by fine, the maintenance and deployment of firefighting equipment, and the reduction of fuel loading. Continued routine patrol and maintenance by MRCA Park Rangers and fire cadets and the continued management of fuel loads along trail alignments would reduce the potential for operation of the proposed trail to result in a wildfire. These efforts would also help assist firefighters in their efforts to defend structures and reduce the risk to Park staff and visitors from wildfire hazards. Therefore, potential impacts from fire hazards would be *less than significant*.

Implementation of the proposed trail is anticipated to shift a portion of the pedestrian traffic along East Winding Way to the existing trail easement over Murphy Way, subsequently reducing congestion and potentially alleviating some of the concern of some residents over perceived lack of security and liability. Nevertheless, this split in pedestrian traffic from East Winding Way would incrementally increase pedestrian traffic on Murphy Way, potentially increasing the perceived concerns of residents along Murphy Way. However, many of the residences located along Murphy Way are gated, with restricted or very limited access to the property, which would reduce potential for incidental trespass on private residential properties by visitors. Further, given that a material increase in park visitation is not anticipated, the shift in recreationist traffic along East Winding Way and Murphy Way and the perceived security and liability concerns of these residents could be managed by existing law enforcement services. Therefore, impacts to police and fire protection services would be *less than significant*.

c & e. No Impact. The Project involves the construction of a recreational trail which would not induce growth within the local or regional area which may subsequently generate additional demand for schools or other public services. Therefore, the Project would have *no impact* on these public services.

d. No Impact. Given the recreational nature of the Project, and the additional access it would provide to the existing Escondido Canyon Park, implementation of the Project would not generate additional demand for park facilities or recreational services. No new amenities would be provided by the Project. No additional parking would be provided at the Winding Way parking lot or on PCH, which would limit the potential increase in overall use of the Escondido Canyon Park trail

network. Implementation of the Project would result in improved access to existing recreational opportunities provided by Escondido Canyon Park's existing facilities, and would alleviate congestion along the Winding Way Trail. As such, this new trail connection is not likely to increase use or visitation of Escondido Canyon Park and surrounding trails, but would instead disperse existing trail goers between the two routes. As further discussed in Section 4.15, *Recreation*, implementation of the Project and construction of the trail would serve to provide additional beneficial recreation opportunities and park services to the residents and visitors of the SMMNRA. Therefore, implementation of the Project would have a *beneficial impact* on park services.

Required Mitigation Measures

The Certified EIR identified MM PS-1 to reduce impacts associated with increased demand for fire protection services from construction of the previously proposed improvements in Escondido Canyon Park. However, given the limited amount of construction and construction equipment, no significant impacts have been identified for implementation of the final trail alignment proposed under the Project. Therefore, mitigation is not necessary.

Residual Impacts

All impacts to public services associated with implementation of the Project would remain *less than significant*.

4.15 Recreation

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Include recreational facilities, or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially conflict with the area's established recreational uses?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Existing Setting

Approximately 14.9 percent of the total land in the City is designated open space, accounting for approximately 1,870 acres of local and regional parks, beach parks, and public open space for recreation. Local and regional parks make up approximately 744 acres of the designated open space in the City (City of Malibu 1995). The nearest existing public recreation facility is Escondido Canyon Park, which would encompass a portion of the proposed trail, and is located 1.3 miles inland from the coast of the Pacific Ocean. The Escondido Falls Trail is the primary public trail within Escondido Canyon Park and allows for use by pedestrians, hikers, dogs (on-leash), bikers, and equestrians. The Escondido Falls Trail is primarily accessed from the Winding Way Trail public parking lot, located at the northwest corner of PCH and East Winding Way. Another trail route from the Winding Way Trail public parking lot is on Murphy Way, which is encompassed by a 40-foot-wide public hiking and riding easement (De Butts Terrace Trail) established over the road and unimproved road shoulders. The proposed trail alignment would connect the trail easement over Murphy Way to Escondido Canyon Park as a secondary access route to the park. The next nearest park and recreational facilities are Ramirez Canyon Park, Zuma and Trancas Canyons open space, and Solstice Canyon open space, which are located approximately 0.43 mile west, 1.67 miles southwest, and 2.24 miles southeast, respectively. Ramirez Canyon is accessible by appointment only.

Impact Discussion

The Certified EIR concluded that proposed Escondido Canyon Park improvements, including proposed trail alignment 4b, would create less than significant impacts on existing park and recreational facilities. Furthermore, the proposed improvements would provide a beneficial impact through increased public accessibility to existing recreational facilities at Escondido Canyon Park and surrounding recreational areas.

a. Less than Significant. The proposed multi-use trail would traverse two contiguous MRCA-owned parcels located along the northern boundary of the City. The Project would result in the development of beneficial recreational facilities, including construction of a critical section of an inland public access trail system that provides unique and spectacular views of the coast and ocean. Additionally, use of the trail will be extended to other users besides hikers, which includes

bikers and equestrians. The Project seeks to connect the Escondido Falls Trail to an existing public trail easement over Murphy Way (De Butts Terrace Trail), which is anticipated to provide an optional route or loop for the Escondido Falls Trail; however, the Project is not anticipated to substantially increase the use or visitation to the Escondido Falls Trail or Escondido Canyon Park. Nor would the Project increase the use of other existing recreational resources within the SMMNRA. No additional parking would be provided at the Winding Way parking lot or on PCH, which would limit the potential increase in overall use of the Escondido Canyon Park trail network. Implementation of the Project would result in improved access to the active and passive recreational opportunities provided by the Escondido Falls Trail, potentially alleviating congestion along other trail areas within Escondido Canyon Park.

Escondido Canyon Park, Escondido Falls Trail, and the proposed Project site were visited by Wood and MRCA staff on four (4) separate occasions and revealed MRCA park and trail facilities are in good condition. Further, MRCA-employed Park Rangers conduct routine patrol and maintenance procedures to maintain all park and trail facilities. Construction of a new connector trail which would not increase use of Escondido Canyon Park or Escondido Falls Trail facilities is therefore not considered to result in increases in the deterioration of any recreational facilities. Therefore, impacts to existing vicinity recreational resources, including the Escondido Falls Trail, would be *less than significant*.

b. Less than Significant. The proposed trail would link an existing public trail easement over Murphy Way with the Escondido Falls Trail to the east to provide additional access to Escondido Canyon Park. The entire segment of the proposed trail would be designed as a multi-use trail, 3 feet in width and with stability and grade sufficient to provide safe use for a variety of users, including walkers, hikers, bikers, and equestrians. Trail construction would occur within an average 6-foot-wide corridor to accommodate the installation of slope-stabilization and erosion-control features (e.g., rock and timber walls). Trail construction would require approximately 326 cy of cut and fill and an estimated 290 cy of export within a roughly 0.54-acre corridor of ground-disturbing activity. The final trail corridor, including slope protection features, would encompass an area of approximately 0.36 acre. Although the Project would include the minor expansion of recreational facilities within Escondido Canyon Park, trail construction would include measures to minimize runoff and erosion during construction (i.e., temporary silt fencing, permanent rolling grade dips and biodegradable coir rolls, etc.), as well as measures to minimize native vegetation removal to the maximum extent feasible (i.e., use of small mechanized equipment and hand tools). Therefore, as concluded throughout this MND, with the implementation of identified MMs, trail construction and operation under the Project would not create an adverse physical effect on the environment and impacts would be *less than significant*.

c. Less than Significant. The Project would not substantially conflict with the area's established recreational uses. After completion of the proposed trail, users would have the option of doing an approximately 3.5-mile-long loop using the existing Winding Way Trail, Escondido Falls Trail, Escondido Canyon Park to Murphy Way Connector Trail and De Butts Terrace Trail. Future users of the proposed trail are anticipated to split access to the trail by both routes, and continue from either direction in a loop back to public parking areas located at the trail parking lot on East Winding Way or along PCH. As such, the trail is anticipated to provide an optional route or loop for the Escondido Falls Trail, but not to substantially increase use of or visitation to this trail. Therefore, the Project would have a *less than significant* impact.

Required Mitigation Measures

The Certified EIR identified no required MMs for implementation of trail alignment 4b. No significant impacts have been identified for implementation of the final trail alignment proposed under the Project. Therefore, mitigation is not necessary.

Residual Impacts

All residual impacts of the Project on recreational resources would remain *less than significant*.

4.16 Transportation and Traffic

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

This analysis is based, in part, on a Traffic Study prepared to evaluate the potential impacts to pedestrian safety and the circulation system that serve the project site (see Appendix F, Associated Transportation Engineers [ATE] 2018). This Traffic Study addresses the potential diversion of hikers from East Winding Way to Murphy Way, pedestrian safety on Murphy Way, and potential safety conflicts for vehicles parking on the PCH road shoulder. Please refer to the Traffic Study for detailed analysis of related issues pertaining to traffic and transportation. The below traffic analysis is based upon pre-fire conditions. However, it is assumed that pre-fire conditions would return as structures are rebuilt in the first few years following the fire.

Existing Setting

The circulation system in the Project vicinity is comprised of residential roads and a state highway. The principal components of this network include East Winding Way, Murphy Way, and PCH, which serves as the backbone of the City's circulation network. A description of each of the roadways included as part of this network are provided below.

PCH (California State Route 1)

PCH is a state highway controlled and maintained by the California Department of Transportation (Caltrans) extending for approximately 21-miles through the City from the City of Santa Monica to the east and the County of Ventura to the west. Within the Project vicinity, the PCH is a four-lane highway with an intermittent center lane providing access to the regional roadway network. The posted speed limit on PCH within the Project vicinity (between Malibu Canyon Road to Trancas Canyon Road) is 50 miles per hour (mph). PCH has an average daily traffic level varying from 18,000 to 57,000 vehicles per day. At its intersection with East Winding Way, dedicated right-turn lanes are absent in the westbound direction, while unprotected left-turn lanes are provided at the intersection in the eastbound direction. PCH is also a designated bicycle route, but because the roadway shoulder varies widely between bluffs and beach, there is limited pedestrian accommodations and no bicycle lanes (City of Malibu 1995). The road shoulders located along PCH are often utilized as parking for access to residences and visitors to the beaches/parks. However, due to the high speed of travel, irregular intervals of pedestrian crossing facilities and signal- or stop-controlled intersections, the safety of pedestrians and vehicles along much of the extent of PCH is a major concern for the City and its residents.

Winding Way

Winding Way (also referred to as East Winding Way, not to be confused with West Winding Way) is a two-lane, undivided road with frequent driveway access serving as the primary access route to rural residences. Beginning at PCH, Winding Way extends for approximately 0.8-mile in an east-west direction along the coastal foothills of the Santa Monica Mountains. Winding Way is paved along its entire length and is classified as a Local Street under the City General Plan Circulation and Infrastructure Element (City of Malibu 1995). An improved decomposed granite road shoulder approximately 5 feet in width is developed along a majority of the length of the road (approximately 0.6-mile) for use as the pedestrian and equestrian Winding Way Trail. Trail signs are installed along the portion of Winding Way used as the Winding Way Trail. The Winding Way Trail serves as the primary access route for visitors to Escondido Canyon Park and the Escondido Falls Trail. The Winding Way Trail, from the Winding Way parking lot to the trailhead for the Escondido Falls Trail, has an elevation gain of approximately 210 feet over a distance of 0.73 mile.

Murphy Way

Murphy Way is a two-lane, undivided road with frequent driveway access. Murphy Way serves as the primary access route to rural residences. Beginning at the intersection of West Winding Way and the Winding Way Connector Road, approximately 0.35 mile north of PCH, Murphy Way extends for approximately 1.1 miles in a north-south direction into the foothills of the Santa Monica Mountains, generally along a ridgeline, to the northern limits of the City. The road then continues into County land for another 0.1 mile before ultimately transitioning into a winding 16-foot-wide unpaved road which connects to various paved and unpaved roads and trails. The southern segment of Murphy Way (between its southern terminus and 5801 Murphy Way, 0.1 mile south of the western terminus of the proposed trail) is generally 20–22 feet wide and is classified as a Local Street under the City General Plan Circulation and Infrastructure Element (City of Malibu

1995). The roadway narrows to 12-14 feet in width along the 370 feet of Murphy Way that extends between 5801 Murphy Way and the western terminus of the proposed trail. The segment of Murphy Way that provides access to the western terminus of the proposed trail serves 19 single-family residences, several of which were burned or damaged in the 2018 Woolsey Fire.



Murphy Way (as viewed from the western terminus of the proposed trail) is within an existing 40-foot-wide public trail easement. Murphy Way narrows from 20-22 feet at its southern terminus to 12-14 feet at the western trail terminus. Murphy Way provides access to 19 homes and an event venue (Rancho del Cielo Malibu).

An existing 40-foot-wide public hiking and riding trail easement designated as the De Butts Terrace Trail is established over the entire length of Murphy Way and intermittent unimproved road shoulders up to the northern limits of the City, which are utilized by hikers and mountain bikers to access other recreational routes within the SMMNRA. The unimproved road shoulder along the eastern edge of the roadway varies on average from 6 to 12 feet in width along the entire segment from West Winding Way to the proposed trailhead.

Pedestrian use of the unimproved shoulder is typically inhibited by low growing vegetation and hedges, and some low-lying tree limbs; however, adequate space exists along much of the segment to allow travel by pedestrians outside of the roadway corridor.

The southern segment of Murphy Way (just north of the West Winding Way/Winding Way intersection) carries 200 average daily vehicle trips (ADT) on weekdays and 140 ADT on weekends. Traffic volumes decrease along Murphy Way as one travels north. The ADT volumes decrease to 110 ADT on weekdays and 80 ADT on weekends about midway along the route. The volumes further decrease to 10 ADT on weekdays and 7 ADT on weekends adjacent to the western terminus of the proposed trail, as this narrow section provides access to only one residence. The paved section of Murphy Way ends at the Rancho del Cielo Malibu, an event venue that can accommodate 200 guests with shuttle service required (destroyed in the 2018 Woolsey Fire). The existing traffic volumes along Murphy Way equate to LOS A operations (low volumes with minimal delays for traveling along the route).



Public parking is prohibited along the entire extent of Murphy Way and West Winding Way and these restrictions are enforced by MRCA rangers who issue tickets to illegally parked vehicles along Murphy Way.

Floating vehicle surveys conducted for the Traffic Study (Appendix F) found that reasonable and prudent vehicle speeds are in the 15–20 mph range along the route to 5801 Murphy Way, just

south of the western terminus of the proposed trail. Speeds are limited by the width of the road (20–22 feet), several speed humps present along the route where there is poorer line-of-sight, poor pavement conditions, and horizontal and vertical curves (Appendix F, Photos 1-9). Safe and prudent vehicle speeds were determined to be 5-10 mph between 5801 Murphy Way and the western trail terminus at 5713 Murphy Way where the roadway is 12-14 feet wide.

Winding Way Connector Road

The first segment of the Winding Way Connector Road that extends between East Winding Way and Murphy Way is about 225 feet long and is a paved roadway that is 12–15 feet wide and serves a single-family residence on East Winding Way. The remaining segment extends for about 650 feet and as an unpaved dirt road that is approximately 10–15 feet wide. Existing volumes on the paved section of the connector road are 10 ADT on weekdays and 7 ADT on weekends.

Existing Trail Access

Access to the Escondido Falls Trail and the location of the proposed trail connection is provided via a 0.73-mile stretch of Winding Way to the Escondido Falls trailhead and then along an approximate 0.7-mile stretch of the Escondido Falls Trail. The Winding Way Trail experiences an elevation gain of approximately 210 feet between the Winding Way Trail parking lot and the trailhead for the Escondido Falls Trail. Vehicle access is not permitted beyond the Winding Way Trail parking lot, and parking for use of the Escondido Falls Trail is limited to the paid Winding Way parking lot. Public parking is prohibited along both Murphy Way and Winding Way.

Impact Discussion

The Certified EIR concluded that implementation of the proposed improvements at Escondido Canyon Park, including installation of trail alignment 4b, would result in less than significant impacts from generation of new construction and operational vehicle trips, availability of parking, and demand for alternative transportation. As such, no MMs were identified which would apply to the proposed Escondido Canyon Park improvements, including trail alignment 4b.

a. Less the Significant. The proposed trail would provide an alternative route between the existing Winding Way paid parking lot (or the adjacent on-street parking on PCH) and Escondido Canyon Park. Or, the new connector trail would provide the opportunity for hikers to walk a loop system between the parking facilities and Escondido Falls (hikers would use the existing trail to Escondido Falls and then hike the new connector trail on return; or vice-versa). The proposed trail is not anticipated to substantially increase the use of or visitation to the Escondido Falls Trail or Escondido Canyon Park in part because available parking functionally limits the number of visitors to the Escondido Canyon Park trail system. No additional parking would be provided by the Project and parking would continue to be prohibited along Winding Way and Murphy Way. Because the Project would not substantially increase the number of visitors or vehicle trips to Escondido Canyon Park, it would not deteriorate operation of PCH, Winding Way, or Murphy Way. Neither would the Project result in a significant deterioration in the operation of or increased congestion at area intersections. Trail users would continue to access both trails via personal vehicle, or possibly by bicycle. No alternative modes of transportation service the Project site or nearby vicinity. Project impacts are *less than significant*.

b. Less than Significant. Traffic that would be generated by the Project would not result in significant impacts to public streets that would require new roads or a significant amount of increased roadway maintenance. As the number of vehicle trips would be materially the same as under existing conditions, there would be no change to the operation of PCH or nearby

intersections. Pedestrian use of Murphy Way would be expected to increase following completion of the trail, and this would likely be offset by a proportional decrease in pedestrian use on East Winding Way.

Although visitors would choose their route by personal preference, most visitors are expected to continue using the existing Winding Way Trail to the Escondido Falls Trail to access the Escondido Canyon Park trail network. The western terminus of the proposed trail on Murphy Way is not anticipated to draw a significant percentage of hikers using the trail system because of the increased distance and elevation that must be traveled to use this route. The new connector trail route between the Winding Way parking lot and the western trail terminus is much steeper and longer (elevation change of 725 feet over 1.35 miles) than the existing Winding Way Trail route (elevation change of 210 feet over 0.73-mile). Accessing the trail network via the proposed western trail terminus on Murphy Way would also require hikers to travel an additional 0.8-mile on the connector trail to access the Escondido Falls Trail. During the hot months of summer and fall, the exposed Murphy Way Trail is expected to be less comfortable and desirable than the shaded Escondido Falls Trail.

Based on the comparative elevation changes and distances for the two routes, the Traffic Study estimated that only 10–20 percent of the peak weekend day hikers would use the new Murphy Way route. This results in 60–120 hikers using Murphy Way on peak weekend days. The addition of 60–120 hikers (and lesser on non-peak days) using the Murphy Way route would not significantly impact traffic operations on Murphy Way between the East Winding Way connector and the western trail terminus at 5713 Murphy Way given the low traffic volumes (140 ADT or less) and the low vehicle operating speeds. Therefore, impacts would be *less than significant*. The potential safety hazard created by the intermix of vehicles and pedestrians is addressed below.

c. No Impact. The Project is not located within the proximity of an airport land use zone or within two miles of a public airport, or private airstrip. The Project proposes the construction and operation of a multi-use recreational trail. No structures would be erected into the above air space and the Project would not disrupt existing air traffic patterns. Therefore, implementation of the Project would have *no impact* with regard to air traffic patterns.

d. Less than Significant with Mitigation Incorporated. Vehicle parking for trail users would continue to be provided at the Winding Way paid public parking lot and on existing road shoulders along PCH, immediately east and west of its intersection with Winding Way. Surveys found 65–100 vehicles parked in the Winding Way Trail parking lot and along PCH adjacent to the parking lot on a high weekend use day during the afternoon period (12:00 pm – 3:00 pm). Parking violations would be enforced by both MRCA Park Rangers during regular patrols and by the County Sheriff as notified by residents, visitors, or MRCA staff. Based on the observed parking demands, the Traffic Study estimated that approximately 400–600 hikers use the trail system on a high weekend use day (assuming vehicles turnover 3 times per high use day and 2 people per vehicle = 600 hikers). Assuming that 10–20 percent of users would access the trail network via the Murphy Way route, Murphy Way would experience the addition of 60–120 trail users on a peak day. These trail users would intermix with vehicular traffic along Murphy Way, potentially creating a safety hazard. As mentioned above, floating vehicle surveys found that reasonable and prudent vehicle speeds are in the 15–20 mph range along Murphy Way from the West Winding Way/Winding Way Connector Road intersection to the proposed western trail terminus (Appendix F). The California Department of Transportation (Caltrans) and American Association of State Highway and Transportation Officials minimum stopping sight distance standards for roads with 15 mph speeds is 80 feet and the standard for roads with 20 mph speeds is 125 feet. The sight

distances provided along the sections of Murphy Way with horizontal and vertical curves generally meet these standards and would limit the potential for vehicular-pedestrian conflicts. However, historically there are areas where narrow shoulders overgrown with vegetation are present, reducing sight distance slightly. In addition, although cleared during the recent fire, due to typically overgrown conditions within the road shoulder, pedestrians would be inhibited from utilizing the road shoulder, thus introducing pedestrian traffic into the vehicle corridor and further increasing risk of vehicular-pedestrian conflicts and roadway safety concerns. Therefore, impacts to traffic operations and hikers along Murphy Way would be *potentially significant*. Implementation of **MM TRAF-1** and **MM TRAF-2** would ensure that pedestrian safety is maintained by requiring signage that notifies motorists of pedestrians, signage that notifies pedestrians to stay along the road shoulder, and by requiring that vegetation is cleared and periodically trimmed to improve sight distance and provide a safe walking area outside of the vehicle corridor.

Public comments received on the PCH Safety Study, conducted by the City of Malibu and approved by the City Council in June 2015, revealed neighbor concern over potential conflicts between motorists and parked cars near the PCH/East Winding Way intersection, noting that residents had occasionally placed orange cones on the shoulder between the Winding Ways to prevent parking along this segment of PCH. Residents also suggested that signs be installed near this intersection instructing drivers to park as far to the right as possible and that shoulders be widened throughout the PCH corridor to better accommodate parking.

Despite these concerns, the PCH Safety Study ultimately concluded that the requested improvements were not warranted; improvements to signage or the roadway shoulders near the intersection were not included on the list of recommended projects. The PCH Safety Study included review of accident data for the 2012, 2013, and 2014 time period.

The study found that there were no accidents at the PCH/East Winding Way intersection during the 3-year period. Thus, the PCH Safety Study did not identify any accident pattern at the intersection or any deficiencies in the roadway geometry at the intersection. The proposed trail is anticipated to provide an optional route or loop for the Escondido Falls Trail, but not to substantially increase in the use of or visitation to this trail or Escondido Canyon Park. Thus, the existing parking along the PCH shoulder would continue to occur at the same rate. ATE performed a field review at the intersection and found that adequate sight distances are present for drivers turning to/from East Winding Way at the intersection. Therefore, the Project would also not materially increase motorists, vehicles, or parked cars at the intersection of PCH and East Winding Way. Impacts are therefore considered *less than significant*.

e. Less Than Significant. As discussed in Section 4.8, *Hazards and Hazardous Materials*, above, the Project is not anticipated to interfere with any emergency response plan or fire evacuation plan, or with access to PCH and the further Kanan Dume Road. Neither construction nor the operation of the Project would require or result in long-term modifications to area roadways that would impact emergency traffic. Construction activities could require vehicles to temporarily stop along Murphy Way and Winding Way, such as when Bobcat® loaders or 4x4 ATVs are entering and exiting the trail. However, construction traffic would conform to all local access standards to allow adequate emergency access. Flagmen would be used to temporarily halt traffic along Murphy Way near the proposed trailhead and along Winding Way near the public parking lot and resume flow when safe. The majority of construction activities for the Project would be confined to the proposed trail area, except for staging areas, which may require some construction activity in the Winding Way public parking lot. The required use of flagmen during these periods would minimize traffic obstruction and delays and ensure that emergency vehicle access is maintained. Additionally, options available to emergency vehicles such as using sirens to clear a

path of travel or driving in opposite traffic lanes would reduce the effect of any incremental increases in traffic. Therefore, impacts would be *less than significant*.

f. No Impact. Recreational user groups would continue to access both trails via personal vehicle, or possibly by bicycle. No alternative modes of transportation service the project site or nearby vicinity. As such, the Project would not result in transit- or transportation-related impacts.

Required Mitigation Measures

The Certified EIR identified no required MMs for implementation of trail alignment 4b. The following site-specific MMs would be required to ensure the Project impacts to traffic are reduced to a less than significant level:

MM TRAF-1 *Murphy Way Signage.* *The MRCA shall install sign posts along the shoulder of Murphy Way at appropriate curves from the connector road to the western trail terminus. The proposed roadway signs shall notify motorists that pedestrians are present on the roadway. Signs shall be installed along the road shoulder of Murphy Way to notify pedestrians to remain within the pedestrian walking area established by MM TRAF-2. The MRCA Park Rangers shall conduct periodic inspections of roadway signs and enforce any violations of parking restrictions.*

Plan Requirements and Timing: All signage shall be included on the trail design plans submitted to the City for approval. All signage shall be installed prior to opening the proposed trail alignment for public use.

Monitoring: MRCA shall conduct periodic inspections to ensure that all signage is properly maintained and free from visual obstruction.

MM TRAF-2 *Murphy Way Shoulder Maintenance.* *Where vegetation encroaches along the eastern shoulder of Murphy Way, MRCA staff shall clear vegetation and where necessary for safe public access, cut tree limbs. All vegetation clearing and tree limbing shall be done in accordance with the requirements of MM BIO-1 and MM BIO-7 of this IS/MND, which include requirement for pre-construction surveys and monitoring by a qualified biologist and/or arborist. The extent of vegetation clearance shall provide a 6-foot-wide walking area where feasible. MRCA staff shall periodically maintain vegetation along the shoulder of Murphy Way and shoulder vegetation shall be routinely inspected to minimize interference with pedestrian passage.*

Plan Requirements and Timing: Vegetation shall be trimmed where required prior to operation of the proposed trail. Implementation of this measure shall be an on-going obligation of the Project.

Monitoring: MRCA shall conduct periodic inspections and routinely maintain vegetation along the Murphy Way road shoulder to ensure that vegetation does not infringe adequate walking area.

Residual Impacts

With implementation of the required MMs, the Project would not result in a significant hazard between motorists and pedestrians on Murphy Way. Consequently, residual impacts associated with land use and planning policies would be *less than significant*.

4.17 Tribal Cultural Resources

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, scared place, or object with cultural value to a California Native American tribe, and that is:				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Existing Setting

AB 52, which went into effect on July 1, 2015, established a consultation process with all California Native American Tribes on the Native American Heritage Commission (NAHC) List and required consideration of Tribal Cultural Values in the determination of project impacts and mitigation. AB 52 established a new class of resources, tribal cultural resources, defined as a site feature, place, cultural landscape, sacred place or object, which is of cultural value to a Tribe that is either: (1) on or eligible for the California Historic Register or a local historic register; or (2) treated by the lead agency, at its discretion, as a traditional cultural resource per Public Resources Code 21074 (a)(1)(A)-(B).

Public Resources Code Section 21083.09, added by AB 52, required the California Natural Resources Agency to update Appendix G of the CEQA Guidelines to address tribal cultural resources. Pursuant to Government Code Section 11346.6, on September 27, 2016, the California Natural Resources Agency adopted and amended the CEQA Guidelines to include consideration of impacts to tribal cultural resources. These amendments separated the consideration of paleontological resources from tribal cultural resources and updated the relevant sample questions to add specific consideration of tribal cultural resources.

At the time of historic contact, the Project vicinity was occupied by the Ventureño Chumash (Kroeber 1925). The Ventureño Chumash band territory extended from Malibu westward along the Pacific Coast and along the Santa Barbara Channel as far as Carpinteria, and extended inland as north as the headwaters of the Ventura and Santa Clara Rivers (Grant 1978). The nearest ethnohistoric Ventureño village occupied when encountered by Franciscan missionaries was *Humaliwu*, on the banks of the Malibu Lagoon (Kroeber 1925). This important village, like *muwu*

at Point Mugu and *šišolop* next to Ventura Harbor, supported a population of several hundred and was situated adjacent to an estuary and a permanent water course draining into the Pacific Ocean. Settlement in the inland portions of the Ventureño territory was densest adjacent to the major drainages such as the Santa Clara River (Appendix C).

Within the Project vicinity, the Ventureño Chumash would have potentially hunted and collected plants along the riparian corridor of the unnamed drainages, and chia (sage) seed in the foothills. Any habitation would be expected to have been temporary during trips of smaller family or specific activity groups focused on specific hunting or collecting. Collection of plant foods and hunting may have occurred on level and steep slopes over 20 percent. Any habitation and activity area such as a temporary camp or hunting station, where stone tool maintenance or re-sharpening would have occurred, would reasonably be expected to occur on gentler slopes of less than 20 percent, as steeper topography would not have been comfortable and was easily avoided (Appendix C).

Impact Discussion

The Certified EIR did not analyze Tribal Cultural Resources as an individual environmental resource section as the EIR was certified prior to the adoption of AB 52. See Section 4.5, *Cultural Resources*, for related discussion of tribal cultural resources that were discussed in the EIR.

a & b. Less than Significant. The EIR was certified prior to the adoption of AB 52, and therefore, no impact determination was made for trail alignment 4b's potential impacts to Tribal Cultural Resources. As discussed in Section 4.5, *Cultural Resources*, the potential to discover an unknown tribal cultural resource within the proposed trail area is highly unlikely given the distance from the known sensitive resource sites; the extent of dense ground cover and steep slopes greater than 20 percent throughout the vast majority of the proposed trail area; and the limited amount of grading proposed for development of the proposed trail. The Project does not propose any alteration or damage to any designated historic structures or resources. While the proposed trail area is located within a region that has a history of habitation by the Chumash and Tongva populations and would include excavation into a steep hillside with limited potential to support cultural resources, no evidence of tribal cultural resources has been identified within the proposed trail corridor and no "unexpected resources" are anticipated. In accordance with AB 52 and Section 11346.6 of the State CEQA Guidelines, the City notified those Tribal representatives identified by the NAHC for Projects in the City, starting a 30-day comment period that extended from October 3, 2017 to November 2, 2017. No comments or requests for consultation were received. In the event that unexpected cultural resources, including tribal cultural resources, are found during construction, compliance with City LIP Chapter 11, requiring that work to stop until further evaluation of the nature and significance of the resources can be determined and properly curated, would ensure unanticipated archaeological resources are properly treated and managed (see Section 4.5, *Cultural Resources*). Therefore, impacts of the Project on tribal cultural resources are considered to be *less than significant*.

Required Mitigation Measures

The Certified EIR was prepared prior to the adoption of AB 52, and therefore, no MMs were identified for trail alignment 4b. No significant impacts have been identified for implementation of the final trail alignment proposed under the Project. Therefore, mitigation is not necessary.

Residual Impacts

Residual impacts of the Project on tribal cultural resources would remain *less than significant*.

4.18 Utilities and Service Systems

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the Project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand, in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Comply with federal, state and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Existing Setting

Within the City, water service is provided mainly by Los Angeles County Waterworks District No. 29 with water supplied from the Metropolitan Water District of Southern California (MWD).

Although the Malibu Civic Center Wastewater Treatment Facility (CCWTF) is now online and treating wastewater near the Civic Center, most wastewater in the City continues to be treated by private onsite Wastewater Treatment Systems (OWTS) such as septic systems, or by one of the five small, package sewage treatment plants within the City: the Latigo Bay Shores, Point Dume, Trancas Canyon, Malibu Mesa and Maison de Ville. In the Project vicinity, many of the properties located along Murphy Way are serviced by OWTS and no septic or wastewater systems are provided for Escondido Canyon Park or the parcels proposed for development of the Project.

Solid waste disposal in the City is handled by four private hauling companies, one of which is under contract to service the Los Angeles County/Malibu Garbage Disposal District. The Simi Valley Landfill and Recycling Center and the Calabasas Landfill are the primary disposal facilities of non-recyclable solid waste for the City. The Simi Valley landfill has an estimated remaining capacity of 63 million tons with a design capacity of approximately 67 years. The Calabasas landfill has an estimated remaining capacity of 6.2 million tons and is projected to reach its

capacity around 2030. Further, there are several other landfill facilities in the County, including the Lancaster Landfill and Recycling Center and the Sunshine Canyon City/County Landfill. At Escondido Canyon Park, trash and recycling are collected by MRCA staff, utilizing pick-up trucks and/or small utility vehicles, and is delivered to King Gillette Ranch in order to be hauled to the Calabasas Landfill. (SMMC/MRCA 2010).

The Southern California Edison Company (SCE) provides electricity from three primary stations and three secondary stations. The Southern California Gas Company provides natural gas. (City of Malibu 2016). However, no electric or natural gas infrastructure or services are provided at the project site.

Murphy Way provides a utility corridor for water, electric and communication infrastructure and is established with a 40-foot-wide water pipeline easement (Parcel 1-2, I.N. 3222, D5459 O.R. 437 & I.N. 77-716235), ingress-egress and utility easement (Parcel 2-68, I.N. 88-1656517), and a drainage easement (I.N. 77-716236). Given the undeveloped and recreational nature of the Project parcels and Escondido Canyon Park, no utility infrastructure is developed on the properties proposed for development of the trail, nor are any utility services provided to these parcels.

Impact Discussion

The Certified EIR concluded that impacts to infrastructure or services related to electricity, natural gas, wastewater, stormwater, water supply, and solid waste from implementation of trail and park improvements at Escondido Canyon Park would be less than significant. However, MMs US-6.1 through US-6.3 were identified as recommended measures to further reduce incremental increases in demand for solid waste services to better ensure impacts would be less than significant level.

a, b, & e. No Impact. The Project would involve the construction of a multi-use recreational trail and no other facilities are proposed. Consequently, the Project would not result in an exceedance of wastewater treatment requirements as use of these systems would not be necessary. Therefore, the Project would have *no impact* related to wastewater treatment requirements or infrastructure.

c. No Impact. Implementation of the Project would not require the construction of any storm water drainage facilities. As discussed in Section 4.9, *Hydrology and Water Quality* above, although negligible compaction of the trail path would occur from repeat use, the Project would not permanently introduce impervious surface areas to the Escondido Canyon watershed that would increase the amount of stormwater runoff within the watershed. Almost all stormwater would percolate into the groundwater or be drained via Escondido Creek and its tributaries, which are not channelized. Therefore, the Project would have *no impact* related to storm water drainage infrastructure.

d. No Impact. No residential or commercial water services exist on site or are proposed as a part of the Project. There would be no long-term change to water use under the Project and expanded water supply entitlements would not be required. Some imported water may be used temporarily to water the initial trail cut to reduce dust and allow for compaction of the soil; however, associated water demands would be short-term and negligible. Therefore, the Project would have a *less than significant* impact on water supplies.

f & g. Less than Significant. The Project would not require the disposal of any additional waste material. All cleared vegetation, including that for fuel reduction, would be moved away from the trail and left to degrade, while all cut soils would be exported offsite to a fill material storage area at the Calabasas Landfill for future use. The Calabasas Landfill has ample capacity to accommodate the estimated 290 cy of fill exported for construction of the proposed trail. Given the Project would not involve the construction or demolition of any structures, no other construction waste material would be generated. Operationally, development of the trail is not anticipated to materially increase visitation to Escondido Canyon Park. Subsequently, the Project is not anticipated to increase generation of solid waste.

Use of the proposed trail has the potential to result in an increase in the amount of litter waste along the Escondido Falls Trail, Winding Way Trail, Murphy Way, and the proposed trail. However, ongoing adaptive changes in Park Ranger schedules based on observed needs and calls for service would ensure proper management and enforcement of MRCA waste disposal and park/trail use restrictions and regulations. Therefore, the Project would have a *less than significant* impact on solid waste.

Required Mitigation Measures

The Certified EIR identified recommended MMs US-6.1 through US-6.3 to reduce impacts to solid waste services from implementation of proposed improvements; however, these measures were identified to reduce the construction and demolition materials associated with building construction, and to reduce solid waste and green waste associated with operations of previously proposed facilities. As the Project would not develop buildings or recreational facilities, these measures would not be required for the Project. No significant impacts have been identified for implementation of the final trail alignment proposed under the Project. Therefore, mitigation is not necessary.

Residual Impacts

All impacts to utilities and service systems associated within implementation of the Project would remain *less than significant*.

4.19 Mandatory Findings of Significance

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wild-life population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of rare or endangered plants or animals, or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Does the project have the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a. Less than Significant with Mitigation Incorporated. Based on the preceding discussion, the Project would neither degrade the quality of the environment nor significantly affect any endangered fauna or flora. Due to the Project's features, including the site design and recommended MMs, as well as the limited degree of development and disturbance associated with Project implementation, the Project would not impact the habitat or population level of fish or wildlife species, nor would it threaten a plant or animal community, nor impact the range of a rare or endangered plant or animal. Potential impacts related to archaeological and paleontological resources would be less than significant with implementation of mitigation, and there would be no impacts related to potential historic resources as none exist on the site.

b. No Impact. The Project would not achieve short-term environmental goals at the expense of long-term environmental goals. The proposed trail would provide the following short-term and long-term environmental goals: increase public accessibility to public open space areas of the SMMNRA and increase opportunity for low-cost public passive and active recreational activities. Short-term environmental goals are not achieved at the expense of long-term environmental goals; therefore, no impacts would occur.

c. Less than Significant with Mitigation Incorporated. It is not anticipated that the Project, when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects, would have a significant effect on the environment.

Although no other connector trails are currently planned to intersect the existing 40-foot wide trail easement over Murphy Way, several attempts have been made to plan additional trails extending west from the existing trail easement. None of these trails are known to be planned for development within the foreseeable future. There are also roughly a dozen undeveloped properties zoned for rural residential uses along Murphy Way that could too be developed. Ultimately, any increased number of trails and homes along Murphy Way may incrementally increase the number of motorists and pedestrians sharing the roadway and easement. This may increase the potential for vehicle-pedestrian conflicts and the concern over quality of life issues from area residents. As with the Project trail, any connector trails that ultimately connect to Murphy Way are not expected to materially increase the use of the overall trail network. As with the Project, none of these connector trails are anticipated to establish major trailhead improvements along Murphy Way, including, but not limited to additional public parking for trail use. Therefore, any increase in hikers along Murphy Way would be limited to those few hikers that wish to complete a long day hike within Escondido Canyon Park or its vicinity. Future residential driveways along Murphy Way would be required to adhere to the safety standards of the LACFD, which would reduce the potential for vehicle-pedestrian conflicts at these future driveways.

As discussed throughout the IS/MND, with the implementation of identified mitigation, all impacts would be less than significant, including those related to quality of life concerns. Included among the identified mitigation is **MM NOI-1**, **MM TRAF-1**, and **MM TRAF-2**, which require that signs be posted at the trail terminus on Murphy Way, along the pedestrian access route on Murphy Way, and at the existing parking lot notifying motorists of the presence of pedestrians and instructing recreationists to be respectful of adjacent residences. Further, MRCA Park Rangers, fire cadets, and volunteer staff would continue to routinely patrol the trail network based on need. These staff would continuously address any issues of vandalism, littering, or other crimes, and monitor trail maintenance for the potential to result in fires. Therefore, the Project and other proposed development along Murphy Way are anticipated to minimally affect roadways and land use impacts in the project vicinity. The Project in combination with these other projects would not result in a cumulative impact.

d. Less than Significant with Mitigation Incorporated. As discussed in the above analyses for the Project, with implementation of the required MMs, the Project would not result in significant adverse impacts. Thus, the Project would not have the potential to result in substantial adverse effects on human beings.

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