

SANTA MONICA MOUNTAINS CONSERVANCY

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May 22, 2006

Mr. Joe Decruyenaere
County of Los Angeles
Department of Regional Planning
Impact Analysis Section
320 West Temple Street
Los Angeles, California 90012

**Comments on Notice of Consultation and Negative Declaration for RENV T200600028
(TR 38931), Modification to Conditions of Recorded
Tract Map, Piuma Road, Dark Canyon Creek**

Dear Mr. Decruyenaere:

The Santa Monica Mountain Conservancy (Conservancy) offers the following comments on the Notice of Consultation and Negative Declaration for RENV T200600028. According to the Initial Study (IS; p. 1), the project consists of a modification to conditions of the recorded tract map (TR 38931) to eliminate a debris basin in Lot 23 and to upgrade two existing culverts passing beneath Piuma Road. The project site is a partially graded subdivision. Construction of the tract would require expansion of existing culverts and would obviate the need to excavate a debris basin within the open space lot. This would use the upgraded culverts to accommodate greater capacity in place of the previously required debris basin (IS; p. 6).

The Mountains Recreation and Conservation Authority (MRCA) has accepted part of the fee title dedication for this tract map (TR 38931), located adjacent to the location of the required debris basin. Other areas on the tract are required to be preserved by conservation easements and fee title dedications. In addition, California Department of Parks and Recreation (State Parks) owns land adjacent to this tract, specifically adjacent to Piuma Road. The Backbone Trail passes through State Parks land and crosses Piuma Road in this location.

If the operation of the project would result in any adverse impacts to the Backbone Trail, we recommend that mitigation measures be proposed and that a Mitigated Negative Declaration be circulated for public comment. In addition, we recommend that the County require that the lot on which the debris basin was originally proposed be dedicated to a park and recreation agency such as the MRCA. This may be in the form of a conservation

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easement or a fee title dedication. This dedication should occur prior to, or concurrent with, any release of responsibility of the applicant to implement the debris basin. This lot is a notable gap in the protected open space land holdings required as dedications for the subject tract. A maintenance easement should be reserved for Los Angeles County Department of Public Works over this new dedication.

As it was difficult to determine the exact changes to the culverts being proposed based on the engineering plans, we would appreciate if you would provide to us any additional information regarding the description of the project. For example, the following information would be helpful to understand the implications of the project: the current and proposed culvert diameters, whether the extent of rip-rap/energy dissipaters at end of the culverts would change, whether the trash racks would change, and the extent of impacts to native riparian plants (if any) and mitigation to be implemented. We encourage the County and applicant to incorporate design features and eliminate constraints in order to maximize the ability of wildlife, including reptiles and large mammals, to move through the culverts.

Thank you for your consideration of these comments. Please direct any questions and all future correspondence to Judi Tamasi of our staff at the above address and by phone at (310) 589-3200, ext. 121.

Sincerely,

ELIZABETH A. CHEADLE
Chairperson

cc: California Department of Parks and Recreation