

SANTA MONICA MOUNTAINS CONSERVANCY

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**Item 13 REVISED**

October 22, 2007

The Honorable Board of Supervisors
County of Los Angeles
383 Kenneth Hahn Hall of Administration
500 West Temple Street
Los Angeles, California 90012

Comments on Proposed Santa Monica Mountains Local Coastal Program Coastal Zone Plan, Local Implementation Program, and related documents

Dear Supervisors:

The Santa Monica Mountains Conservancy (Conservancy) offers the following comments on the Proposed Santa Monica Mountains Local Coastal Program (LCP) Coastal Zone Plan (CZP), Local Implementation Program (LIP), and related documents. The Conservancy urges the Board of Supervisors to approve the plan and we welcome the addition of the following comments.

Importance of Retaining Several Sections of the Local Coastal Program

Private development causing fuel reduction on public lands is a drain on park agency budgets and protected natural resources. Section 22.44.604.C.8. Fuel Modification Zones of the LIP (p. 55), which states in part, "Fuel modification shall not extend into open space or parkland" is a critical element to retain in the LCP. Likewise, we support Policy CO-44 in the CZP (p. CO-26), which states: "Require that brush clearance for any new development or improvement does not encroach into dedicated open space or parkland." Statements such as these should not be weakened and variances for this provision should not be allowed. Dedicated open space should also be defined to include open space and conservation easements held by governmental entities.

We compliment the Department of Regional Planning on the quality and focus of the many of the goals and policies in the subject CZP. For example, we support Policy CO-20 (p. CO-21), which states in part:

Use land dedications in fee title to a public agency and/or qualifying non-profit land preservation organization to ensure the preservation of natural biological habitats and linkages...Secondary alternatives are conservation easements...Financing for long-term maintenance should be considered...

Allowed Uses in Parkland

We compliment the staff on the text of the LIP referring to park uses. The LIP is fairly clear in terms of defining what type of permit is needed (or if an activity is exempt) for specific park uses and facilities. However, we request the following changes be made to ensure that it is clear what permits are required, if any, for the following additional park uses and facilities. These changes would help ensure there is not an undue burden on the park agencies for typical park uses and facilities, with a realistic consideration of the potential, if any, for significant adverse impacts to coastal resources. As stated in the CZP (p. CO-30), the cornerstones of the area's recreation opportunities are the existing Federal and State parks, beaches, and trails. Policies to encourage a full range of recreational experiences and to encourage opportunities for recreation (e.g., policies CO-65, CO-66) serve to implement the Coastal Act and policies.

Habitat restoration by our staff is an ongoing activity in our parks, and certain types of habitat restoration should be considered exempt, and listed in Section 22.44.620.B of the LIP (p. 73). The following text should be added to this section: "native habitat restoration that involves no soil disturbance with machinery (e.g., augers, bobcats) and no destruction of live, native plants, but that allows planting of native plant species, installation of herbivory exclosures (e.g., gopher cages), and removal of non-native species with minor methods."

Making all private temporary uses in parks subject to a minor CDP (LIP, Section 22.44.620.D, p. 74) would cause undue burden and expense on the park agencies. An application would need to be filed, a fee paid, and a hearing would need to occur, even for very small temporary events, with virtually no impacts on coastal resources. That language should be deleted. We recommend that the following be added to the exemptions section for parks (LIP, Section 22.44.620.B, p. 73):

Transient uses typically allowed in the State Park System that will result in no adverse impacts to coastal resources.

To clarify the requirements for construction of new trails in parklands or on private lands, we recommend that text be added to the LIP, Section 22.44.620 Parks, trails, playgrounds,

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and beach, whereby construction of new trails less than 1/4 mile would require a waiver.

It appears that in the Open Space zone, refreshment stands operated in conjunction with and intended to serve the patrons of a use permitted in the zone may require a major CDP (see proposed LIP Section 22.44.737, p. 93, and County Code Section 22.40.430). We recommend that the following use be added as an exemption in Section 22.44.620.B, as we cannot foresee any adverse impacts to coastal resources; in fact this would benefit park users: “Camp stores selling refreshments and interpretative materials in existing structures previously used for public purposes.”

Thank you for your consideration of these comments. If you have any questions, please contact Paul Edelman of our staff by phone at (310) 589-3200, ext. 128.

Sincerely,

ELIZABETH A. CHEADLE
Chairperson