

National Park Service
U.S. Department of the Interior

Santa Monica Mountains National Recreation Area
California



General Management Plan Environmental Impact Statement

Volume 2 of 2

Final
GENERAL MANAGEMENT PLAN
&
ENVIRONMENTAL
IMPACT
STATEMENT
VOLUME 2 OF 2

Santa Monica Mountains National Recreation Area
~ *California* ~



JULY, 2002

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Consultation & Coordination



*Over 70 government
and municipal entities
share jurisdiction
with the National
Park Service in the
Santa Monica
Mountains National
Recreation Area.*



CONSULTATION AND COORDINATION WITH OTHERS

History of Public Involvement

This document is the product of an extensive effort to involve the public in defining the future of the SMMNRA. The Santa Monica Mountains area is different from more traditional national parks and recreation areas in that people live and work within its boundaries. Unlike older park areas where long-term residents are considered “in-holders” whose property would eventually be acquired, here they are neighbors and stakeholders. For these people living in the SMMNRA their use of land is more generally regulated by local and state governments, rather than by the NPS. Two of the goals of this GMP/EIS are to increase neighbor awareness of the uniqueness of this area and encourage cooperation to preserve this quality. Cooperation between agencies and landowners is required to solve conflicting needs, to determine common goals, and to achieve those goals.

Throughout the planning process, the SMMNRA has requested input from the public at critical stages. Public participation in planning ensures that the SMMNRA fully understands and considers the public’s interests in the park as part of their national heritage, cultural traditions, and community surroundings. The GMP/EIS effort began in July 1997 when the planning team met to familiarize team members from outside the park with the resources, discuss issues and the scope of the plan, and create the SMMNRA mission statement. In August, a meeting was held with more than 70 public agencies associated with land management within the SMMNRA boundary, to discuss the issues and future of the park. In early September 1997, the public was formally notified of the planning effort and introduced to the planning process through publication of *Newsletter One*.

▲ *View of Boney Mountain from Rancho Sierra Vista/Satwiwa (NPS photo).*



Newsletter One was sent to the public in September 1997 to notify them of the planning effort and their role. This newsletter contained the new mission statement and advised the public of the schedule for the planning process. Comment forms were also distributed with that newsletter requesting views on what was valued most and how the public envisioned the park twenty years from now. The newsletter was printed in English and Spanish and posted on the National Park Service Internet site. Seven public meetings were held the week of September 22, 1997 in several locations in Los Angeles and Ventura County. Public response to the newsletter was light as was attendance at the public meetings.

In December 1997, *Newsletter Two* was distributed to the public synthesizing all the comments on issues and the future of the park that were received from the public, agency and municipal officials, and from the park staffs. The majority of responses were concerned with limiting development, and protecting the resources and character of the SMMNRA, and conflicting visitor use. Four "Visions for the SMMNRA" were created using that information. The information was enhanced and analyzed by using the overlay system of geographic information systems (GIS) software (see Appendix) to map sensitive environmental areas (e.g., threatened and endangered species, watersheds, cultural resources, etc.) These visions, or alternatives, were compiled into a color document and distributed in June 1998. Another comment form was included in that document, requesting feedback on the visions and announcing public meetings to be held late in July 1998. This newsletter was also printed in English and Spanish and put on the Internet.

Newsletter Three, Visions for the Future was sent out in June 1998, and nine public meetings were held in July to reach as many

people as possible. Media notification was intensified to generate interest. This newsletter focused on four "visions" and became the synthesis of all comments and scientific data. A comment form requested feedback on which vision was preferred. These comment forms were also distributed at the public meetings. Response from each of these venues favored a "preservation" approach that was tempered with public education to further preserve the park through generations. Attendance at the public meetings increased over the previous public meetings. Out of the approximately 4,000 newsletters that were distributed, only 200 responses were received.

All of the above newsletters were available in Spanish, and were placed on the Internet. Public meetings on the Draft GMP/EIS were held in spring 2001 after the distribution of more than 1,000 copies and compact discs. Public input on the future of the SMMNRA was collected from the public meetings and the GMP was revised when appropriate.

Consultation with the State Historic Preservation Office and Advisory Council on Historic Preservation

The California State Historic Preservation Office and the office of the Advisory Council on Historic Preservation were contacted in September 1997 and advised of the beginning of the general management plan and environmental impact statement. Newsletters were provided to both agencies throughout the planning process, keeping them advised of the status of the project. Both offices would be contacted prior to the release of the GMP/EIS. Both offices would receive a copy of document and a request for comments on that plan. A copy of the final GMP/EIS would be sent upon its completion.

Consultation with the American Indians

Information about the beginning of the GMP/EIS planning process was provided to affiliated or interested Native American recognized Tribes, individuals, and organizations by letter in September 1997. In April 1998, a meeting of NPS officials and staff with about 20 representatives from affiliated tribal communities and organizations was held at Peter Strauss Ranch. Numerous ideas, concerns, issues and statements of perspectives were given and discussed which have been seriously considered in the preparation of the plan. Future meetings will be scheduled to continue these discussions.

Consultation with the U.S. Fish and Wildlife Service and National Marine Fisheries Service

U.S. Fish and Wildlife Service, Ventura Fish and Wildlife Office (USFWS) and National Marine Fisheries Service (NMFS) – During preparation of this document, the NPS has coordinated informally with USFWS and NMFS personnel. The federal species included in tables 12 and 13 were compiled using lists and information received from the USFWS for other projects in the park. These lists were provided for review to the USFWS on September 13, 2000. On September 14, 2000, the USFWS (Rick Farris) responded informally by telephone to inform the NPS that California condor and arroyo southwestern toad should be removed from the list; Riverside fairy shrimp should be added to the list; and the status of peregrine falcon should be revised to indicate “no federal status.” For steelhead trout, the NPS has been coordinating with NMFS.

In accordance with the Endangered Species Act and relevant regulations at 50 CFR Part 402, the NPS determined the preferred alternative is not likely to adversely affect any federally threatened or endangered species and sent a copy of this GMP/EIS to the USFWS and NMFS with a request for written concurrence with that determination. In a letter dated January 10, 2002, the USFWS concluded that implementation of the GMP is not likely to adversely affect listed species or critical habitat. The NPS has also prepared a biological assessment (see appendix) for review by the NMFS to address issues related to steelhead trout. In a letter dated June 14, 2002 (see appendix before the biological assessment document), the NMFS concluded that implementation of the GMP will have no effect on steelhead trout. In addition, the NPS has committed to consult on future actions conducted under the framework described in this GMP/EIS to ensure such actions are not likely to adversely affect threatened or endangered species.

Consultation with the California Coastal Commission

Pursuant to Section 930.34 *et seq.* of the National Oceanic and Atmospheric Administration Federal Consistency Regulations (Title 15 Code of Federal Regulations, Part 930), and in accordance with the Federal Coastal Zone Management Act of 1972, as amended, and the California Coastal Act of 1976, as amended, the National Park Service prepared a consistency determination that found the draft SMMNRA GMP consistent to the maximum extent practicable with the California Coastal Management Program. The Coastal Commission approved the consistency determination (see appendix) after resolving



concerns stemming from the generalized format of the GMP. In particular, the Commission was concerned that the GMP inadequately assessed its proposed projects' potential impacts on Environmentally Sensitive Habitat Areas (ESHAs) and wetlands. The NPS provided a summary of the NPS tiered planning process and explained the programmatic long-range nature of the GMP. The GMP is the top-level park planning tool, followed by more specific planning documents, including short-range park strategic plans, subject-specific plans, site-specific plans, and project-specific plans. Each of these park planning documents will usually require subsequent, more specific, consistency determinations to be submitted at the time detailed project planning begins. The Commission approved the consistency determination subject to the following conditions. All subsequent consistency determinations must describe and address the subject project's potential impacts on any ESHA-qualifying resources as defined by the Coastal Act. Proposed projects must be evaluated for wetland impacts using the Coastal Act definition rather than the Army Corps of Engineers' definition. In addition, a protected buffer of at least 100 feet around wetlands and ESHAs must be incorporated into all future projects' design.

List of Agencies and Recipients to Whom Copies Will Be Sent

The document is being circulated to the agencies, organizations and municipalities listed below.

Federal Agencies

- Advisory Council on Historic Preservation
- Department of the Navy, Naval Air Weapons Station, Pt. Mugu

- Department of the Army, Army Corps of Engineers
- Department of the Interior, U.S. Fish and Wildlife Service, and U.S. Geological Survey
- Department of Transportation, Federal Highway Administration
- U.S. Environmental Protection Agency
- Federal Emergency Management Agency
- National Oceanic and Atmospheric Administration
- National Marine Fisheries Service
- Senator Diane Feinstein
- Senator Barbara Boxer
- Congressman Brad Sherman
- Congressman Elton Gallegly
- Congressman Henry Waxman
- Congressman Howard Berman

State Agencies

- California Coastal Commission
- California Historic Preservation Officer
- Department of Fish and Game
- Department of Water Resources
- CALTRANS (California Department of Transportation)
- SCAQMD (South Coast Air Quality Management District)
- Sheila James Kuehl, California State Assembly, 41st District

Municipal and County Contacts

- Zev Yaroslavsky, supervisor 3rd District
- Las Virgenes Municipal Water District
- City of Agoura Hills
- City of Calabasas
- City of Beverly Hills

- City of Malibu
- City of Hidden Hills
- City of Santa Monica
- City of Thousand Oaks
- City of Westlake Village
- County of Los Angeles, Planning Division, Department of Parks and Recreation
- County of Los Angeles, Beaches and Harbors Planning Division
- City and County of Ventura, Planning Division
- Conejo Park and Recreation District
- Conejo Open Space Conservation Agency

Organizations

- Mulholland Scenic Corridor Design Board
- Resource Conservation District of the Santa Monica Mountains
- Mountains Restoration Trust
- National Trust for Historic Preservation
- National Parks and Conservation Association
- Sierra Club
- California Preservation Association
- Los Angeles Conservancy

Public Comments on the Draft General Management Plan/Environmental Impact Statement

This section addresses the oral and written public comments received on the Draft General Management Plan/Environmental Impact Statement. A notice of availability of the document was published in the December 14, 2000 Federal Register. The original end-date for receiving comments was

February 28, 2001. The National Park Service extended that date by 92 days, until May 31, to ensure a full opportunity for the public to make comments on the draft General Management Plan. The total length of the comment period was roughly 140 days from the time the documents were received by the public until the close of the comment period. Comments postmarked after May 31, 2001 were not accepted.

The National Park Service received more than 100 comment letters and numerous verbal comments at public meetings held in Calabasas, Santa Monica, Los Angeles, Malibu, and Thousand Oaks, California. All comments were reviewed and considered by the planning team in preparation of the Final GMP/EIS, consistent with the requirements of 40 CFR 1503. The comments allow the planning team, NPS decision-makers, and other interested parties to review and assess the views of other agencies, organizations, and individuals with respect to the preferred alternative, the other alternatives, and their potential impacts. *It is important to note that the selection of the preferred alternative is not based solely on how many people support a particular alternative or action.*

The section summarizes the comments received at the public meetings and written comments by topic issue. General responses are made to common and specific issues raised in the public comments. A summary of changes made to the GMP/EIS is contained in the responses. Next, comment letters from federal, state, and local agencies, and private organizations are reproduced, and responses are included for all substantive comments. In addition, responses are provided for other agency and organization comments that warranted a response (e.g., comments that reflected confusion, misinformation, or misperceptions).

Wherever appropriate, the text in the Final GMP/EIS has been revised to address



substantive comments. These changes are identified in the NPS responses. No response was given to comments simply expressing preference for an alternative or action within an alternative. **Any page number citations in the comments and responses refer to the draft GMP/EIS unless otherwise noted.**

As defined in NPS Director's Order 12, "Conservation Planning, Environmental Impact Analysis, and Decision Making Handbook" (2001), comments are considered substantive when they:

- question, with reasonable basis, the accuracy of information in the EIS.
- question, with reasonable basis, the adequacy of environmental analysis.
- present reasonable alternatives other than those presented in the EIS.
- cause changes or revisions in the proposal.

Comments in favor of or against the proposed action or alternatives, or comments that only agree or disagree with NPS policy, are not considered substantive.

Because of the volume of comments received from individuals, no individual comments have been printed. The planning team believes that the summary of comments and responses captures the substantive comments raised in individual letters and oral presentations.

Summary of Public Meetings

The SMMNRA planning team held five public meetings on the draft GMP/EIS in 2001. The meetings were held in Calabasas (February 5), Santa Monica (February 6), Los Angeles (February 7), Malibu (February 8), and Thousand Oaks (February 9). A total of 200 people attended the meetings. At most of the meetings, the public was given the opportunity to make oral presentations limited to three to four minutes, which were recorded and transcribed.

Most of the people who spoke at the meetings commented on the following issues:

- commingling of recreational uses, e.g., hiking, biking, equestrian, day use, and camping
- trails planning and management, primarily with respect to mixing of or conflicts between the different types of visitor experiences, e.g., hikers, bikers, and equestrians
- acquisition and inclusion of property within the SMMNRA boundary
- resource and ecosystem protection

Summary of Written Comments

Comments were received from federal, state, and local agencies, private organizations, and individual interested parties. The issues reflected in the written comments were essentially those presented at the public meetings. The comments from agencies were primarily directed toward regulatory compliance for air quality, biological resources, coastal protection, fire management and control, traffic patterns and control, and water quality. The majority of comments from organizations and individuals were directed toward management policies for commingling of recreational uses. Comments were made, both pro and con, about restricting the use of trails and other areas from some types of recreational activities, such as horseback riding or mountain biking. Concerns were raised about safety and the quality of visitor experience with the mix of recreational uses. Other comments concerned protecting natural and cultural resources from degradation (non-impairment). Another topic raised was the mix of property types and jurisdiction (federal, state, local, conservancy) and how the various categories were incorporated in the management of SMMNRA.

Issue Statements and Responses by Topic and Comment Category

The following section was summarized from substantive comments received on the NPS's Santa Monica Mountains National Recreation Area Draft GMP/EIS from October 2000 to May 2000; refer to the "Public Comments on the Draft General Management Plan / Environmental Impact Statement and Responses" section for the full text of all agency and organization comments received. Comments from individuals and multiple comments on the same topic are included below.

SMMNRA RESOURCES

Air Quality Issue Statements and Responses:

EFFECT OF URBAN DEVELOPMENT AND VISITOR USE OF SMMNRA ON AIR QUALITY

Comments were made that urban development of Ahmanson Ranch will result in more than 200 tons of smog per year added to the air quality at the SMMNRA, while preservation of Parkland will maintain the current airshed function provided by Ahmanson Ranch. A description of the role and function of the South Coast Air Quality Management District (SCAQMD) and data on the non-attainment status for criteria pollutants (ozone, carbon monoxide, PM10, etc.) in the SCAQMD, impacts to air quality from vehicle trips associated with current visitation of the SMMNRA, and estimates of the annual recreation visits and air emissions impacts from vehicle traffic 15 to 20 years from now should be included in the "Affected Environment" and "Environmental Consequences" sections. It was recommended that the determination of whether an air quality analysis can be dismissed from the EIS should be based on these combined findings.

Other comments included that the cumulative impact analysis fails to account for the impacts of diverting visitors to other recreation facilities, the enforcement resources required for diversion, the aggravated traffic and air quality impacts resulting from diversion, and the negative visitor experience as a result of implementing the preservation alternative.

RESPONSE

The opinion that development of the Ahmanson Ranch will impact air quality has been considered, but no change has been made to the GMP/EIS. The regulation of this development rests with Ventura County, which has the responsibility to ensure that air quality issues are adequately mitigated. Moreover, the property is outside the boundary of the National Recreation Area (and is not within a boundary expansion study area) and therefore is not available for acquisition by the National Park Service. The NPS welcomes the continuing involvement of the public in the management of the SMMNRA and appreciates the thoughtful and committed input received on the GMP/EIS.

The recommendations for inclusion of additional information in the description of the affected environment and analysis of the environmental consequences have been considered. The affected environment description and environmental consequences analyses contained in the DEIS have been modified, and air quality analysis data has been added.

The GMP/EIS does not propose limiting recreation access, only preserving the quality of the visitor experience. The plan seeks to facilitate broader access to recreational opportunities in the SMMNRA through new visitor centers, outreach facilities, and better transportation systems (i.e., shuttles).



***Cultural and Historical Sites Issue
Statements and Responses:***

**IDENTIFICATION OF AND PROPOSED TREATMENTS
FOR CULTURAL AND HISTORICAL SITES**

The State Historic Preservation Officer praised the adequacy of and compliance with the National Historic Preservation Act of 1966 for the proposed procedures for identifying and treating culturally and historically significant resources within the SMMNRA, including the Paramount Ranch, Peter Strauss Ranch, Ahmanson Ranch, Rancho Sierra Vista, Solstice Canyon, the DeAnza Trail, and Las Virgenes Creek.

An individual commenter stated that there is no acknowledgement of the cultural and historic values of the farms, ranches, and original land grants that played a large part in preserving the land within the SMMNRA boundaries (e.g., Will Rogers Ranch, Sampo Ranch, Danielson Ranch, and Circle X Ranch).

Comments were made that the historical significance of the Tongva Indians and DeAnza Expedition to the area needs to be researched. There was also a request for more text on the contribution of Rancho life to SMMNRA.

Page 251 No Action Alternative #2, Backbone Trail completion, states, "Mountain bike riding could be moderately to highly destructive to cultural resources through the acceleration of erosion." Questions were raised as to the specific quantification of this data and the mitigation measures being considered.

RESPONSE

The statements and opinions about the procedures for identifying and treating historically and culturally significant resources in the SMMNRA boundaries have been considered. The NPS welcomes the continuing involvement of the public in the management of the SMMNRA and

appreciates the thoughtful and committed input received on the GMP/EIS. Careful readers will note that there are already a number of references in the GMP/EIS to the historic ranches throughout the SMMNRA. Many of these ranches require further study and more detailed plans for protection (see page 171).

Concerns about needed cultural and historical research of agricultural and native tribe uses of SMMNRA land are generally consistent with the preferred alternative proposed in the GMP/EIS – see in particular the Mission Goals on page 41. Beginning on page 431 in the DGMP/EIS is a more detailed outline of planned research to document and preserve historical and cultural uses associated with the mountains, including ranching, Spanish expeditions, and occupation by the Tongva Indians. Specific suggestions will be retained for later use during more detailed planning efforts. The discussion of the role of rancho life in the succeeding development of SMMNRA has been slightly expanded.

In the discussion of carrying capacity (starting on page 173) in the DGMP/EIS, the SMMNRA has not noted damage to any cultural sites as a result of mountain biking. The favored strategy to avoid this problem is by rerouting trail construction where significant resources are discovered through advanced archeological surveys.

***Mediterranean Ecosystem Issue Statements
and Responses:***

ENVIRONMENTAL EDUCATION

A comment was made that a major emphasis should be placed on educating SMMNRA visitors, both children and adults, on the Mediterranean Ecosystem through interpretive signs and programs.

RESPONSE

These comments are generally consistent with the preferred alternative proposed in the

GMP/EIS, and the Education Themes Common to all Alternatives listed on pages 51-53 in the DGMP/EIS. Specific suggestions will be retained for later use during more detailed planning efforts.

Resource Protection (Non-impairment) Issue Statements and Responses:

**BIOLOGICAL AND SPECIAL STATUS SPECIES
RESOURCE PROTECTION**

Comments contained a request that SMMNRA provide valuable leadership for a more coordinated plan for fire safety that incorporates an approach to ecologically sensitive vegetation management in the wildland interface zone. The preferred alternative should have a stronger commitment to weed control. Preserving the unique vegetation assemblages within the SMMNRA is critical to its long-term sustainability and value. The value should include ecological considerations, as well as the calculated contributions of the native vegetation, to reducing stormwater runoff and erosion, moderating temperatures, filtering air pollutants, and sequestering carbon. Lighting along Mulholland Highway should be eliminated or reduced to the maximum extent possible to encourage wildlife migration.

RESPONSE

The important planning component for the SMMNRA regarding the request for coordination on fire safety is too detailed to be addressed in the GMP. Since the time that these comments were received, the NPS (NPS), in cooperation with other SMMNRA agencies in the Santa Monica Mountains, as well as Los Angeles County and Ventura County Fire Departments, has begun the development of a revised Fire Management Plan that reflects ecologically sensitive vegetation management. Management and

guidance for weed control will be developed later, at a finer scale, in a more detailed invasive weed management plan, which is being prepared. The NPS agrees that preserving the unique vegetation of the SMMNRA and the values associated with it are valuable contributions to society. Precise calculations of the value of “ecological services” are not easily calculated and, for the purposes of this document, are simply acknowledged to exist. The comments on Mulholland Highway lighting are consistent with the mission goals and preferred alternative of the DGMP/EIS (page 42).

See also later Special Status Species/Habitat Issue Statements and Responses summary.

**RECREATIONAL AND VIEWSHED RESOURCE
PROTECTION**

Recommendations were made for the creation of more trails that minimize wildlife habitat, visual aesthetics, noise, residential development, and traffic impacts. The comment was made that residents would prefer that the beaches west of Zuma and as far as Point Mugu be identified and managed for lower intensity use rather than moderate or high intensity use.

Additional recreational and viewshed resources should be purchased for the SMMNRA, including Liberty Canyon wildlife corridor, upper Las Virgenes Canyon and Caballero Canyon, and the scenic roads associated with these and other canyons. More emphasis should be placed on these other roads as scenic corridors than Mulholland. The GMP states that “Visual and recreational elements of Mulholland Drive and Highway would be promoted and preserved.” Comments voiced concern over whether noise protection and increased patrols of Mulholland by CHP and sheriff’s officers will be considered. The NPS should monitor and control vegetation, lighting, and



visual impacts of the local residential neighborhoods on the park lands, as well as future development. The study of possible wilderness designation north and west of Circle X proposed in the GMP is unnecessary, since the land is remote and already protected by the SMMNRA and/or California Wilderness designation. No mitigation measures are set forth to counter the impacts caused by mountain bikes.

RESPONSE

The comments on the creation of more trails are consistent with the visitor experience outlined in Table 7. Recreational trail use is supported by all GMP alternatives according to the management zoning. Further planning for possible new trails is beyond the scope of the GMP/EIS and will be covered under the forthcoming Trail Management Plan.

Therefore, no change has been made to the GMP/EIS. The GMP has been modified on page 48 under “Actions Common to All Alternatives” to broaden the goal of restoration to include all disturbed lands, and thereby cover issues such as debris cleanup. Specific projects to remove junk and debris are too detailed to be addressed in the GMP.

The comments regarding purchasing additional land for the SMMNRA are generally consistent with existing land protection plans adopted by the NPS and/or the Santa Monica Mountains Conservancy, as well as the general goals and objectives of the GMP. The preferred alternative does recognize the exceptional scenic qualities of the Las Virgenes/Malibu Canyon roadway. As noted in Table 8 of the GMP, transportation elements seek to promote the visual and recreational elements of Mulholland, but concede challenges such as sound factors (see page 42). Increased patrols by other agencies are issues beyond the scope of this plan. The objectives concerning monitoring and controlling impacts to the SMMNRA by

residential neighbors are supported by the mission goals of the GMP, to the extent that such issues are within the scope of the SMMNRA agencies’ authority. Wilderness designation of the area north and west of Circle X is an important planning component that will be addressed at such time as wilderness study is undertaken. Mitigation measures for impacts caused by mountain bikes will receive more specific exploration as part of the Trail Management Plan.

***Special Status Species/Habitat Issues
Statements and Responses:***

**SPECIAL STATUS SPECIES AND HABITAT
PROTECTION**

Comments were made emphasizing the importance of preserving the Rindge Dam and reintroducing steelhead trout below the dam after the waters of Malibu Creek are returned to their 1920’s pristine conditions. It was recommended that steelhead trout also be reintroduced into the more pristine Sequit, Solstice, and Topanga Creeks, as well as the Trancas Watershed.

In particular, a comment was made that the summary on page 131 of the draft GMP/EIS does not recognize the historic, current, and potential wetland and estuary habitat significance to this species, nor the importance of restoring these habitats. It was recommended that the PCH Bridge at Solstice Canyon be re-engineered to permit the passage of steelhead trout, in addition to several other very specific planning suggestions.

The statement in the GMP/EIS that the “Cheesboro Canyon trailhead will be expanded” needs to be clarified. Previous development plans for the canyon fall within rare prime valley oak savanna habitat, which is the largest oak native to the United States and is only found in a small area within the SMMNRA. The White Oak Farm Proposal at Malibu Creek State Park is conceptually a

good idea, but is no longer appropriate in a state park in that location due to several factors, including its proximity to prime valley oak habitat. There is an alternative demonstration farm, Pierce College Farm, in Woodland Hills.

Comments also mentioned protection of wildlife corridors and connectivity, the California red-legged frog, 400 acres of unique California native grasslands, the Braunton's milk-vetch plant, and the possibly extinct San Fernando Valley spineflower.

RESPONSE

The steelhead trout reintroduction comments are consistent with the mission goals and preferred alternative of the GMP, and further study and planning will be required before any action is initiated. Formal consultation with NMFS in compliance with this request has been undertaken to address potential adverse effects to steelhead and its critical habitat. This important planning component for the SMMNRA is too detailed or site-specific to be addressed in the GMP/EIS. The DGMP/EIS specifically asserts the objective to restore wetlands/lagoons and estuaries in the "Actions Common to All Alternatives," section, and it specifically mentions the Topanga Creek and Trancas Watershed on pages 152 and 156, respectively. The description of the affected environment however, has been modified.

The comments on specific planning suggestions for prime valley oak habitat preservation are too detailed to be addressed in the GMP. The final plan for the Simi Hills Area will address these concerns at an appropriate level of detail. The NPS is cognizant of the significant valley oak population in the lower portion of the study area. Opinions on the protection of the other species mentioned above were considered; however, no changes have been made to the GMP/EIS. The NPS welcomes the continuing involvement of the public in the management

of the SMMNRA and appreciates the thoughtful and committed input received on the GMP/EIS. The comment regarding the White Oak Farm proposal is too detailed or site-specific to be addressed in the GMP, but will be retained for use in future planning efforts. The preferred alternative element pertaining to habitat connectivity has been modified to reinforce the importance of wildlife corridors. Comments regarding the California red-legged frog, Braunton's milk vetch, etc., have been considered, but no change has been made to the GMP/EIS.

See also Biological and Special Status Species Resource Protection issue comments and responses.

Water Resources Issue Statements and Responses:

WATER RESOURCES

Several comments, including the Southern California Association of Governments (SCAG), stated that the GMP/ EIS does not address the subject of water reclamation. A discussion of the manner in which the project is supportive of or detracts from the achievement of this policy should be added. There was also a recommendation that the mitigation measures for geology, soils, and water resources commit to avoiding sensitive resources through careful siting of facilities, similar to the statement for biological resources and wetlands found on page 63. A detailed comment was made that the water resources map contained in the GMP/EIS is inadequate for natural resources purposes due to lack of such criteria as natural perennial water sources and the inaccuracy of streams available to many animals and of streams depicted as perennial that are not.

Under "Actions Common to All Alternatives," the DEIS states that watershed and coastal resources would be protected and preserved through watershed management practices and improvements (p. 48). More



information was requested on proposed watershed management practices and improvements. The construction stormwater management plan (p. 63) should go beyond the requirements of the Standard Urban Stormwater Mitigation Plan and Stormwater Quality Management Plan. Any general management plan adopted by the NPS should include requirements similar to, or more stringent than, the requirements in the recently-adopted Los Angeles Regional Water Quality Control Board's Waste Discharge Requirements for small commercial and multifamily residential subsurface sewage disposal. Impacts due to runoff from NPS facilities should be reexamined for their potential impact to local waterways, and construction should be prohibited during the rainy season due to the highly eroding soils found in the Santa Monica Mountains.

RESPONSE

With respect to water reclamation, Regional Comprehensive Plan and Guide (RCPG) Core Policy 11.07, the recommendation for addressing that subject in the GMP/EIS has been considered. Although water reclamation is not specifically addressed in the water resources section, the GMP/EIS is supportive of the broader goal of minimizing water consumption. Although SMMNRA agencies support the principle of using reclaimed water wherever possible, they generally maintain landscapes that are entirely natural to minimize the use of either potable or reclaimed water. The comments will be retained for use in future planning efforts.

The analysis of environmental consequences in the DEIS has been modified in Table 9 and under mitigation measures for soils and water resources. The limitations of the current water resources map are acknowledged, although it represents the best efforts of state and federal agencies to report such data. The NPS is conducting a more detailed inventory of water resources in the

SMMNRA using much of the same criteria outlined in the comment.

The recommendations for more information on watershed management practices and improvements have been considered, and the actions common to all alternatives contained in the DEIS have been modified. The comments on the construction stormwater management plan are consistent with the mission goals and preferred alternative of the DGMP/EIS (p. 54). They speak of a level of concern, however, that is more detailed than the current document. They will be retained for formulation in appropriate site-specific plans as well as future revisions to the Water Resources Management Plan.

The NPS concurs with the comments regarding requirements for a general management plan and has standards already in effect that meet or exceed those requirements. They will be applied in the construction of any applicable project, assuming all other environmental reviews and considerations are satisfied.

The analysis of environmental consequences has been modified to account for a reexamination of runoff potential. The NPS agrees that construction should be avoided during the rainy season and, except in emergency situations, likewise avoids this practice during the winter. The text has been revised to reflect that existing practice.

VISITOR EXPERIENCE

Recreational Uses Issue Statements and Responses:

COMMINGLING OF RECREATIONAL USES

Numerous comments were received with respect to this topic. Several commenters expressed the view that mountain biking, hiking, and horseback riding are not compatible uses to be mixed on a multiuse trail. Mountain biking should be restricted to

fire roads and gravel trails, while other trails should be limited only to hikers and/or horseback riders. Other comments spoke to the opposite view, that mountain bicyclists should be allowed access to more trails, because mountain biking is a legitimate use of SMMNRA resources. Yet other comments stated support for the creation of more multiuse trails that all users were free to access.

Several suggestions were made to mitigate the issue with commingling recreational uses, including marking sides of a trail for a particular use, marking entire trails themselves for a single use, developing overnight trail camps and hitching posts along the trails for equestrian use, improving parking to accommodate horse trailers, prohibiting mountain biking in the SMMNRA, regulating speeds, and requiring licenses for bicyclists.

Several comments stated that the descriptions of the conflict between recreational uses, the legitimacy of mountain biking as a use, and the extent of the impact of all three uses be better emphasized in the GMP/EIS, particularly in the mission goals and impacts analysis.

There is a deficiency in the indexing of equestrian references, there being more text references than are actually indexed.

RESPONSE

The suggestions for trail management regarding the commingling of recreational uses speak to concerns more detailed than the scope of the GMP/EIS. They will be used in the formulation of a Draft Trail Management Plan, expected for release sometime in late 2002 or early 2003. The comments are consistent with the visitor experience outlined in Table 7. Issues pertaining to trail-user conflicts are identified, at a general level, as planning issues on page 28 and as mission goals on page 41. Efforts to resolve some of these conflicts will require proposals more

detailed than the scope of the GMP/EIS. The mission goals are directed at broad objectives for recreation (p. 41), in a sufficiently general manner to avoid unintentionally excluding certain types of recreational use. More specific objectives and implementation strategies will be considered in the Trail Management Plan.

Concerns about environmental impacts are addressed on pages 173-175. Both the preferred and the recreation alternatives have been amended to include overnight trail camps proposed in the Santa Monica Mountains Area Recreation Trail Report. The precise implementation of the camps will be established in the Trail Management Plan.

The DGMP does recognize mountain biking as a legitimate use on page 94.

The deficiency in references to equestrian uses has been corrected in the final GMP/EIS by adding horses and horseback riding to the index.

EDUCATIONAL PROGRAMS AND PLANS

Comments expressed interest and emphasis on educating and working together with the communities adjacent to the SMMNRA boundary. The SMMNRA should work with local law enforcement to educate the public on leash and dog control laws. An emphasis should be placed on environmental education, more informative and educational signs, overnight education camps, and environmental education camps. One commenter stated that visitor education would be best restricted to entry points, urban sites, and at Mugu Lagoon (keeping disturbances to waterfowl at a minimum). Because Paramount Ranch is already disturbed, it should be maintained as an event site due to its existing character. Another commenter suggested that there should be organized hikes, runs, and rides through the state and federal park lands to introduce people from outside the area to the SMMNRA.



RESPONSE

NPS concurs with these comments. All alternatives presented in the plan, including the preferred alternative, are intended to fulfill the mission goal on page 40 of the GMP, i.e., *“Establish an ongoing dialogue and partnership with state and local governments, agencies, jurisdictions, and SMMNRA neighbors to promote shared responsibility to protect open space and adjoining habitat, trails, ethnographic and historic resources and scenic vistas.”* Both the preferred and recreation alternatives have been amended to include the overnight trail camps proposed in the Santa Monica Mountains Area Recreation Trail Coordination Project Report. The specific implementation of the educational components of the camps will be established in future development plans that are beyond the scope of the GMP/EIS. Similarly, environmental education facilities will be evaluated on a site-specific basis in more detailed plans at a future point. NPS agrees with the suggestion of organized hikes, rides, and runs through the SMMNRA, so long as the proposed events do not risk the enjoyment of recreational opportunities and SMMNRA resources available to the general public.

EXISTING OR HISTORICAL USES

Several public comments indicated that the GMP/EIS does not contain enough references to the historic contributions of the rancho, farming, and equestrian uses of the SMMNRA, and the original land grants that helped preserve the land.

RESPONSE

Careful readers will note a number of references in the DGMP/EIS to the historic ranches throughout the Santa Monica Mountains. A number of these require further study, and more detailed plans for protection and visitor enjoyment and education are

indicated on page 171 of the document. A brief discussion expanding on the role of rancho life in the SMMNRA has been added to the final plan.

MIX OF EXPERIENCES AVAILABLE

Many comments expressed concern regarding the lack of recreational facilities – such as facilities for overnight, family, and equestrian camping in the mountains along the coast and in the mountains. Comments also included support for organized hikes, runs, and rides throughout the SMMNRA. Questions were raised as to how many more miles of trails, unpaved parking lots inland of the beach, restrooms, and camping facilities will be added to the SMMNRA.

RESPONSE

The public is encouraged to read the enabling legislation that created SMMNRA, which is presented on page 419 of the DGMP/EIS, and consider how that relates to the mission statement for the plan set out on page 33. The law sets forth a broader set of legal mandates than perhaps the term “recreation area” implies. It should be noted that providing recreation is one of the goals for the plan and that all alternatives seek to fulfill that obligation, including both the preferred and the recreation alternatives.

Recreation Facilities Issue Statements and Responses:

PRIVATE RECREATION FACILITIES

One commenter asserted that the draft plan makes no mention of privately owned recreation facilities within the SMMNRA, which attract thousands of visitors monthly and most of which predate the recreation area. There is also no mention in the draft GMP/EIS of private/ public cooperative efforts by the NPS and private landowners to create a National Recreation Area for the mutual benefit of the public. There was

concern that the private landowner provides commercial infrastructure to the public to defer the costs of providing the recreational facilities needed for the SMMNRA. The original 1982 GMP addresses these partnerships in depth. The GMP/EIS ignores private sector economic investments such as camps and schools and health resorts, conference centers, riding stables, outdoor education programs, and restaurants, which are most likely the way visitor amenities would be expanded. Private lands comprise over 54 percent of the SMMNRA. The NPS should conduct a survey of all the private facilities to determine the number of annual visitors each serves and the long-range expansion plans for each of these facilities.

RESPONSE

The NPS agrees that the private sector plays a critical role in offering direct and indirect recreational services in the Santa Monica Mountains. Moreover, it is NPS policy to encourage private recreation services, when appropriate, rather than compete with them. Therefore, a mission goal, under the “Visitor Experience” section has been added to ensure that this principle is prominently reflected in SMMNRA planning and policies. Additional information concerning the current role played by private recreation vendors has been incorporated in the mission goals of the GMP/EIS.

PUBLIC ACCESS TO SMMNRA FACILITIES

Comments included concern that the GMP/EIS did not address accessibility of SMMNRA resources for disabled SMMNRA visitors. Several suggestions were made for other aspects of accessibility, such as making one side of the streets adjacent to trails restricted parking for residents and the other side for people wanting to access the trail. Other suggestions involved prioritizing facilities in the SMMNRA for accessibility

actions, developing guidelines for gate use for ingress and egress, providing access to camping and campgrounds, and using fire roads to carry shuttles to the tops of mountain peaks. Some comments expressed concern for a perceived intent of the GMP/EIS to limit access or reduce public access and the accompanying economic and public rights impacts that would occur as a result of limiting access.

RESPONSE

Although stated as a SMMNRA goal on page 42 in the DGMP/EIS, the NPS agrees that the question of accessibility needs to be addressed more clearly, which is done in the Table 7 for “Visitor Experience and Activities” of the FGMP/EIS. It should be noted that specific actions to improve accessibility will be proposed for discussion with the public in future development and use management plans that will implement this GMP. Suggestions and guidance for managing SMMNRA access are too detailed or site-specific to be included in the GMP/EIS and will be retained for use in future planning efforts and implementation. The GMP does not propose limiting recreation access, only preserving the quality of visitor experience. The plan clearly seeks to facilitate broader access to recreational opportunities in the SMMNRA through new visitor centers and outreach facilities and better transportation systems, such as shuttles. A Trail Management Plan will be prepared to study opportunities for further enhancing visitor experience in greater detail.

RECREATION PLANS

See previous Public Access to SMMNRA Facilities comment summary.

RESPONSE

See the previous Public Access to SMMNRA Facilities response.

SMMNRA FACILITIES, INCLUDING PARKING

Some commenters stated there should be scenic pullouts with interpretive signs at a number of locations in the mountains. There was widespread support for completion of trails such as the Backbone Trail reroute around the Boney Wilderness, the DeAnza Trail through the Simi Hills, and the Coastal Slope Trail. The plan should include trails and boardwalks into Navy Lands at Point Mugu. Funding priorities should not be placed on constructing buildings, because a key SMMNRA satisfaction goal is to provide access to natural areas without man-made structures. There is concern that there are insufficient facilities for equestrian use – in particular, no hitching posts, equestrian campgrounds, water facilities, only one trail camp, and very poor trailhead parking.

Representatives from the EPA commented that under the preservation alternative, parking is described as being constructed “with gravel or other pervious material wherever possible” (p. 68). However, in the “Environmental Consequences” section, the GMP/EIS states that new paved parking areas would be constructed. The discrepancy should be clarified – use pervious material wherever possible for parking areas as a component of all the alternatives. Comments were also made that parking at popular trailheads, such as Cheeseboro and Newton Canyons, is often insufficient. Several commenters requested more overnight camping facilities, bicycle racks at current facilities, more visitor centers, more trails, and related items.

RESPONSE

Recommendations for trail and facility completions and additions speak to a level of consideration more detailed than the scope of the GMP/EIS and will be retained for future use during more detailed planning efforts. The NPS is mindful of the continuing interest on the part of many to see

development limited in the SMMNRA. Commenters are invited to review more detailed and site-specific plans that are offered for public review in the future to gauge the appropriateness of any facilities that might be proposed.

Some parking facilities would need redesign to meet increasing demand, but this would be balanced with alternative transportation modes. Facility size will be determined later as more site-specific plans are undertaken. Considerations to demand will be given, but the protection of the resources, including the recreational experience available to the public, will be of first consideration. The implementation of mitigating measures such as a shuttle system can help meet these demands.

The NPS is aware of the congestion at the popular trailheads; one of the elements of the preferred alternative would seek to alleviate this problem. The requests for additional facilities are more detailed than the scope of the GMP. They will be used in the formulation of a Draft Trail Management Plan, expected for release sometime in 2003.

Visitation and Transportation Plans Issue Statements and Responses:

SMMNRA VISITATION

Comments reflect a general perception that the GMP/EIS’s acknowledgement of a 12 percent increase in visitors ignores, and is in conflict with, the plan to reduce access and use of facilities. In addition, there seems to be an omission of planning for increased access and use for the increased numbers of visitors.

RESPONSE

The plan does not propose limiting recreation access, only preserving the quality of visitor experience. The plan clearly seeks to facilitate broader access to recreational opportunities in the SMMNRA through new visitor centers and outreach facilities and



better transportation systems, such as shuttles. With respect to visitation, the number cited in the plan reflects reported levels of recreational activity within the legislated boundaries of SMMNRA; it does not represent visitation levels for any one agency, but it does represent the public constituency that the plan seeks to serve.

TRANSPORTATION PLANS

The GMP/EIS does not address transportation investments based on the Southern California Association of Governments (SCAG) regional performance indicators of mobility, accessibility, environment, reliability, safety, livable communities, equity, and cost-effectiveness. The final GMP/EIS should also address how the plan supports or detracts from the achievement of the objectives of the Regional Transportation Plan (RTP) as incorporated into the Regional Comprehensive Plan and Guide (RCPG) Core Policy 4.01. Encouraging the use of recreational shuttle buses is one of the stated actions common to all alternatives; however, the summary of alternatives only mentions that option being explored under two alternatives. More clarification is requested on the shuttle bus system as it is conceived at this point. The DEIS does not address the NPS fleet or how transportation goals will be applied to the NPS fleet and NPS employees regarding alternative forms of fuels and transportation.

RESPONSE

With regard to Core Regional Transportation Policy 4.01, the GMP is not intended to comprehensively address transportation investments in the way that a locally adopted general plan might. Among the eight core RTP objectives, the GMP is supportive of the accessibility, environment, and livable communities objectives, while remaining neutral with regard to the other objectives. The GMP supports the RTP objectives by

advocating the development of transportation alternatives and the reduction of vehicle miles traveled. It is not within the scope of the GMP to address indicators such as mobility in detail, given that the focus of the GMP is on preserving natural and cultural resources and providing recreational opportunities. Comments will be retained for use in future planning efforts. Table 8 in the FGMP/EIS has been modified to show that all action alternatives contain a shuttle transportation proposal in some form. The SMMNRA mission goal pertaining to alternative fuels has been modified to reflect the goal of converting its fleet to alternative fuels, as well as the availability of financial incentives to NPS personnel who carpool or use public transportation.

LAND USE AND SOCIOECONOMIC ENVIRONMENT

Development Issue Statements and Responses:

LAND USES

Comments included suggestions that the NPS should do more to prevent development in the areas adjacent to the SMMNRA.

RESPONSE

Although the SMMNRA agencies involved in preparing this plan do comment on inappropriate development and will continue to work with local communities and governments to promote development that minimizes impacts on parklands and other significant resources, decisions involving this important planning component for the SMMNRA are outside the scope of the GMP and accompanying EIS analysis. The analysis contained in the GMP/EIS will be available to assist other SMMNRA decision makers; however, decisions involving this component will not be made by the NPS in the record of decision for the GMP/EIS.



OPERATIONS

SMMNRA Management Issues Statements and Responses:

LAW ENFORCEMENT

There is a lack of reference to law enforcement efforts in the GMP/EIS index regarding such issues as mountain bike speeding, riding off designated trails, failing to yield the right-of-way, motorcycle riding on and off trails, dogs off leashes, cut fences and trespassing, and supervision of campgrounds. Current observed conditions of enforcement efforts regarding the issues mentioned above are also lacking. A budget and plan should be developed to police the use of mountain bikes in the SMMNRA.

RESPONSE

These comments have been considered. "Law enforcement" has been added to the index in the FGMP/EIS. The level and management of SMMNRA law enforcement are too detailed to be addressed in depth in the GMP. However, the comments will be retained for use in formulating the Draft Trail Management Plan, expected for release sometime in 2003.

GENERAL MANAGEMENT OF THE SMMNRA

Comments voiced concern over a lack of cooperation between the NPS and State of California, for instance, at the boundaries of NPS land and state wilderness. Volunteers are needed for office duties, trail maintenance and construction projects, and patrols to reduce the abuse of trails.

RESPONSE

The SMMNRA agencies cooperate on many levels in the administration of the Santa Monica Mountains. A formal agreement of

cooperation has been in effect since 1995, signed by the NPS, California Department of Parks and Recreation, Santa Monica Mountains Conservancy, and the Mountains Recreation and Conservation Authority. Even this GMP was undertaken cooperatively. Solutions to potential conflicts between agencies are addressed in the management goal on page 44 calling for the development of uniform rules and regulations. The NPS concurs with the statement regarding volunteers and actively recruits and uses volunteer service in a national program that realizes an average of 40-50 thousand volunteer hours annually. These comments are consistent with and are a critical element to the success of the goals and objectives of the GMP/EIS.

POLLUTION PREVENTION

One of the GMP Land Use and Ownership Goals is to apply sustainable design and to use ecologically responsible materials. The Resource Conservation & Recovery Act (RCRA) Section 6002 required federal, state, and local agencies, and their contractors, who use appropriated federal funds to purchase EPA-designed materials, including EPA-designed construction and landscaping products. A representative of EPA suggested that the NPS include a commitment to these requirements in the final GMP/EIS.

RESPONSE

This important planning component for the SMMNRA is too detailed or site-specific to be addressed in the GMP. The comments will be retained as a component of the NPS environmental management plan, already under development. Management guidance for this component will be developed later, at a finer scale, in an implementation plan that provides more detail than the GMP.

WASTE MANAGEMENT

Comments identified a common desire to prioritize the goal of clean up and maintenance of existing SMMNRA lands, in particular land that has been disturbed by large amounts of debris. Other comments stated that information in the GMP/EIS about the Calabasas Landfill, such as the type of refuse accepted and the basis for the capacity of the landfill, are inaccurate and should be changed.

RESPONSE

The GMP has been modified on page 48, under “Actions Common to All Alternatives,” to broaden the goal of restoration to include all disturbed lands, and thereby cover issues such as debris cleanup. Specific projects to remove junk and debris are too detailed to be addressed in the GMP. The GMP/DEIS has been changed to supply the correct information about the Calabasas Landfill.

WILDFIRE MANAGEMENT

A fire management plan should be included in the EIS that addresses the wildfire potential that exists in the SMMNRA. The plan should include strategies for vegetation management mitigated by methods such as prescribed burning to help reduce the potential of catastrophic wildfire to the neighboring residents and communities. The GMP/EIS makes an inaccurate assessment of the County of Los Angeles Fire Department’s ability to absorb additional demand for service by stating that the no action alternative would have only negligible impacts on public services and utilities due to available capacity at local suppliers. In reality, the County of Los Angeles Fire Department has inadequate capacity to serve existing and planned development in the area, and will need at least one new fire station.

RESPONSE

Since the time these comments were received, the NPS, in cooperation with other SMMNRA agencies in the Santa Monica Mountains, as well as the Los Angeles County and Ventura County Fire Departments, has begun the development of a revised Fire Management Plan that reflects these agencies’ fire management practices. Public and Private Property Rights, Acquisition, and Adjustments Issues Statements and Responses: Privately Held Rights or Property
The NPS has limited the draft GMP/EIS to the SMMNRA. However, it should also include all publicly and privately owned and proposed parks and open spaces in the Simi Hills.

RESPONSE

The commenter’s conclusions and concerns are shared by the NPS. The description of the affected environment contained in the EIS has been modified. The final plan for the Simi Hills Area will address these concerns at an appropriate level of detail.

PROPERTY ACQUISITIONS/ADJUSTMENTS

Commenters requested that the NPS purchase additional property for the SMMNRA, including areas like the Simi Hills, Liberty Canyon wildlife corridor, upper Las Virgenes Canyon, the Serrania Park/Avatar Area, Caballero Canyon north of Dirt Mulholland, Ladyface and Triunfo Canyon, Gillette Ranch, the Stone Canyon Area, Lower Topanga Canyon Boulevard and Topanga Beach, and the whole of Ahmanson Ranch. Commenters requested that the GMP/EIS no longer show the “Gillette Ranch” or any part of Soka University’s land holding as the future site of a joint administrative facility for the SMMNRA, because the resources are



not available to purchase the University's property.

RESPONSE

These recommendations for acquiring additional property for the SMMNRA are generally consistent with existing land protection plans adopted by the NPS and/or the Santa Monica Mountains Conservancy, as well as the general goals and objectives of the GMP. The issue of land acquisition is addressed in a more specific plan called the Land Protection Plan. The relationship between that document and this GMP/EIS is discussed on pages 19-20. Copies are readily available for viewing on the Internet through the SMMNRA's Web site. Lower Topanga Canyon Boulevard and Topanga Beach are in fact already within SMMNRA boundaries.

The GMP/EIS proposes the adjustment of the boundary to include some 2,300 acres of the Ahmanson Ranch in its "Actions Common to All Alternatives" section. The actual authority to adjust the boundaries of the SMMNRA in excess of 200 acres or \$750,000 in value rests by law with the Congress of the United States. The NPS believes that if Soka University presents a reasonable offer to the American people, the property should be, will be, and can be acquired. The plan is not intended to interfere with the current owners' enjoyment of their property. At the same time, it is intended to anticipate the most desirable future condition for the SMMNRA, and guide the actions of the SMMNRA agencies that manage its resources. Land acquisition inquiries are addressed fully in the SMMNRA's Land Protection Plan.

PUBLIC SAFETY

Comments reflected great concern about the safety hazards of turning off the lights on Mulholland Drive and Pacific Coast Highway.

RESPONSE

The actions common to all alternatives contained in the GMP/EIS have been modified to ensure that safety remains a principal consideration. The GMP supports, where possible, the removal of street lighting and overhead power lines.

GMP/EIS

DEIS Issues Statements and Responses:

DEIS ALTERNATIVES

The No Action alternative fails to include boundary studies on the north and west perimeters of the SMMNRA. The education alternative proposes scenic corridors throughout the SMMNRA to be used by automobiles, which would lead to increased traffic, polluted runoff, and increased fragmentation of habitat corridors. There should be a much stronger commitment to weed control in the preferred alternative.

Several comments pertained to the question of why the "recreation alternative" was not the preferred alternative, given the fact that this is the Santa Monica Mountains National Recreation Area.

RESPONSE

These comments are generally consistent with, and understood to support, the preferred alternative proposed in this GMP/EIS. Weed control strategies are too detailed to be addressed in the GMP. Management guidance for this component will be developed soon, at a finer scale, in a more detailed Invasive weed management plan.

Regarding the preferred alternative of this GMP/EIS, the public is encouraged to read the enabling legislation that created SMMNRA, which is presented on page 419 of the draft GMP/EIS, and consider how that

relates to the mission statement for the plan that is set out on page 33. The law sets forth a broader set of legal mandates than perhaps the term “recreation area” implies. It should be noted that providing recreation is one of the goals for the plan and that all alternatives seek to fulfill that obligation, including both the preferred and the recreation alternatives.

DEIS ANALYSIS

Comments regarding the DEIS analysis are found throughout this summary of comments and responses and are not repeated here.

DEIS/GMP TEXT ERRORS, MAPPING ERRORS, CONTRADICTIONS, OR MISSTATEMENTS OF FACT

Several comments were received pertaining to text errors, contradictions, or misstatements of fact. Issues included certain recreation areas not included in the plan that should be, inadequate descriptions, missing crucial information, trails or SMMNRA features not identified on the maps, inconsistencies in the text from one section to another, phrases that should be reworded, etc.

Other comments regarding the content of the GMP/EIS are found throughout this summary of comments and responses and are not repeated here.

RESPONSE

Most of the suggestions to remedy text errors, mapping errors, contradictions, and misstatements of fact have been considered and the GMP/EIS has been modified where appropriate. Some suggestions were too detailed or site-specific to be addressed in the GMP/EIS but will be retained for use in future planning efforts.

GMP CONTENT/VISION ISSUES STATEMENTS AND RESPONSES

The NPS will submit its General Plan along with a consistency determination. A

consistency determination is a brief statement that the project is consistent with the California Coastal Management Program (CCMP), an analysis of the relevant Coastal Act policies, a detailed project description, and any data and information necessary to support the consistency determination.

RESPONSE

No change has been made to the GMP/EIS; however, a consistency determination has been prepared to accompany the final GMP/EIS.

Other comments regarding the content of the GMP/EIS are found throughout this summary of comments and responses and are not repeated here.

NEPA Process Issues Statements and Responses:

Numerous requests for an extension of the comment period, varying from one month to 90 days, were made. Other issues involved concern that the method of accessing the GMP/EIS on the Web is still excessively difficult for all but very technical people.

RESPONSE

The original end date for receiving comments was February 28, 2001. The NPS extended that date by 92 days, until May 31, to ensure a full opportunity for the public to make comments on the GMP. The total length of the comment period was roughly 140 days from the time the documents were received by the public until the close of the comment period. The NPS recognizes that not all interested parties have access to the Internet, which is why the draft document was available in reading rooms in or near the SMMNRA.



COMMENTS

RESPONSES

CONGRESSMAN BRAD SHERMAN
24TH DISTRICT, CALIFORNIA



SERVING THE SAN FERNANDO AND CONEJO VALLEYS,
LAS VIRGENES AND MALIBU

COMMITTEE ON BANKING
AND FINANCIAL SERVICES

COMMITTEE ON
INTERNATIONAL RELATIONS

February 5, 2001

Arthur E. Eck, Superintendent
Santa Monica Mountains National Recreation Area
401 West Hillcrest Drive
Thousand Oaks, CA 91360

Dear Superintendent Eck:

Let me begin by congratulating the Santa Monica Mountains National Recreation Area's principal administrators, the National Park Service, the California State Parks, and the Santa Monica Mountains Conservancy, on their outstanding cooperative effort in developing the current draft of the General Management Plan and Environmental Impact Statement. This comprehensive document, based on information provided by over 70 federal, state, and local agencies and municipalities in addition to critical public comment, outlines the SMMNRA's significance, mission, and goals in an effort to address the challenge of protecting the resources of this unique national park.

Created by an Act of Congress in 1978, the mission of the SMMNRA is to protect and enhance, on a sustainable basis, one of the world's last remaining examples of a Mediterranean ecosystem and to maintain the area's unique natural, cultural, and scenic resources unimpaired for future generations. Seventeen million people are within a one-hour commute of the SMMNRA. The park is the home to over 450 animal species, more than 50 threatened or endangered plants and animals - among the highest concentration of such rare species in the United States, and more than 1,000 archeological sites providing an historical record of over 10,000 years of human habitation in this region. From petroglyphs to Hollywood's "Golden Era of Motion Pictures," the SMMNRA has had a spiritual, cultural, and economic connection to the people who have lived here.

These meetings to discuss the park's General Management Plan are important to making sure that the proper balance is struck among preservation, recreation, and education. I have immense confidence in Superintendent Art Eck to determine the best way to manage the park. This spring, as Congress puts together the federal budget, I will be working feverishly in Washington to seek additional resources to acquire land for the Santa Monica Mountains National Recreation Area.

My representative will attend all five of the general management plan meetings and will prepare a digest of both the oral and the written comments submitted to the National Park Service. After reviewing that information I may weigh in on one or two of the controversial issues. At this stage, the only thing that I am sure the park needs is additional funds to purchase additional land.

In closing, I would like to leave you with this Greek Proverb. "A civilization flourishes when people plant trees under whose shade they will never sit." We are lucky to have benefitted from the vision of our predecessors. Let us ensure future generations reap the rewards of our stewardship.

Sincerely,

BRAD SHERMAN
Member of Congress

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Consultation and Coordination
Comments and Responses - Federal Government Agencies





COMMENTS

RESPONSES



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
Southwest Region
501 West Ocean Boulevard, Suite 4200
Long Beach, California 90802-4213

FEB 22 2001

In reply refer to:
151422SWR01PR123:APS

Arthur E. Eck
National Park Service
Santa Monica Mountains National Recreation Area
401 W. Hillcrest Drive
Thousand Oaks, California 91360

Dear Mr. Eck:

The National Marine Fisheries Service (NMFS) reviewed the National Park Service's (NPS) General Management Plan and Environmental Impacts Statement for the Santa Monica Mountains National Recreation Area (Plan). NMFS considers NPS' implementation of the Plan a Federal action in accordance with 50 CFR §402.02 and is therefore subject to section 7 of the Endangered Species Act of 1973, as amended.

- 1. NMFS believes activities or programs associated with the Plan may cause adverse effects to steelhead and critical habitat, and therefore formal consultation is necessary

However, before NPS requests formal consultation with NMFS, these two agencies should meet for the purpose of defining the scope and content of the consultation. Anthony Spina is the principal contact for this specific project. Please call him at (562) 980-4045 to identify a mutually agreeable time, date, and location for the interagency meeting.

Sincerely,

Rebecca Lent, Ph D
Regional Administrator

- 1. Formal consultation with NMFS in compliance with this request has been undertaken to address potential adverse effects to steelhead and their critical habitat.

COMMENTS

RESPONSES



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

February 28, 2001

John J Reynolds
Regional Director, Pacific West Region
National Park Service
600 Harrison Street, Suite 600
San Francisco, CA 94107-1372

Dear Mr Reynolds

The Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the **Santa Monica Mountains National Recreation Area General Management Plan**, California (CEQ#00043, ERP# NPS-K61152-CA). Our review is pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality regulations (40 CFR Parts 1500-1508) and Section 309 of the Clean Air Act.

The proposed action is the implementation of a General Management Plan (GMP) for the Santa Monica Mountains National Recreation Area (SMMNRA). This GMP will provide a framework for management activities in SMMNRA for the next 15 to 20 years. Four alternatives are presented in the DEIS: No Action Alternative, Preferred Alternative, Preservation Alternative, Education Alternative, and Recreation Alternative. These alternatives differ primarily in terms of land use designations (low, moderate, high) and facilities development.

EPA is highly supportive of the management goals established by the National Park Service (NPS) to meet the mission of the SMMNRA. In particular, EPA applauds the Resource Condition Goals and Access and Transportation Goals as ways of both protecting SMMNRA resources and sharing them with the public.

In our review of the document, we found that the DEIS sufficiently addresses the environmental impacts of the proposed alternatives, with the exception of the air quality section, which needs to be improved. EPA has rated this document EC-2, **Environmental Concerns-Insufficient Information**. Please see the attached *Rating Factors* for a description of our rating system. Our rating of EC-2 reflects our concerns regarding the adequacy of the air quality analysis. EPA *strongly* recommends that the NPS address the following recommendations in the preparation of the Final EIS:

Consultation and Coordination
Comments and Responses - Federal Government Agencies





COMMENTS

RESPONSES

AIR
Air Quality

1. The air quality discussion needs to be improved both in terms of the information provided and the analysis performed on the SMMNRA's contribution to regional air quality problems. The Affected Environment section on air quality is missing key information on current nonattainment status for criteria pollutants (pp.117-118). The document acknowledges that air quality adjacent to the Santa Monica Mountains is among the worst in the country. However, the DEIS does not describe the extent of this problem or the entity with jurisdiction over the air basin. The DEIS must disclose the fact that the South Coast is in extreme nonattainment for ozone, serious nonattainment for carbon monoxide, and serious nonattainment for small particulate matter (PM10). This information is crucial in understanding existing air quality conditions.
2. The DEIS acknowledges that the majority of airborne pollutants that affect the SMMNRA are generated by automobile and truck traffic. Yet, the DEIS dismissed air quality from further consideration because "the amount of traffic that would use these roads is primarily determined by the growth of the surrounding communities and not by any actions of the SMMNRA" (p.214) This assertion is not substantiated and does not take into account trips generated by people recreating at the SMMNRA.

The SMMNRA currently supports over 33 million recreation visits annually (p.174) and "the majority of visitors use their private vehicles to access the area" (p.174). In addition, "most of the major routes through and near the SMMNRA are currently operating at or near capacity" (p.175), "there is very little public transportation available within the SMMNRA" (p. 204), and there are current limitations to parking capacity (pp.205-206). All of these factors point to the need to quantify current and future SMMNRA visitor impacts to air quality from the use of private vehicles.

Recommendations:

3. In the Affected Environment section, include a description of the role and function of South Coast Air Quality Management District (SCAQMD) and a description of the nonattainment status for criteria pollutants in the South Coast.
4. Substantiate the claim that air quality issues can be dismissed from further consideration by quantifying the vehicle trips associated with current visitation of the SMMNRA and the air quality impacts of those trips. Also estimate the annual recreation visits 15 to 20 years from now (time frame of the GMP) and the vehicle and air emissions associated with those trips. Based on these findings, determine whether an air quality analysis can be dismissed from the EIS.

Construction

The South Coast is in serious nonattainment for PM10, and construction activities are primary generators of PM10 emissions. The GMP should address mitigation measures for PM10 emissions generated by construction activities.

1. This information, action, or recommendation has been considered. The description of the affected environment contained in the FEIS has been modified to include a discussion of pollutants.
2. This information, action, or recommendation has been considered. The analysis of environmental consequences contained in the FEIS has been modified under the Air Quality sections of all alternatives.
3. This information, action, or recommendation has been considered. The description of the affected environment contained in the FEIS has been modified.
4. This information, action, or recommendation has been considered. The analysis of environmental consequences contained in the FEIS has been modified under the analysis of impacts. Air quality data has been added in the appendix.

COMMENTS

RESPONSES

- ▶ Recommendation Include mitigation measures for PM10 emissions generated by construction activities

TRANSPORTATION

EPA is highly supportive of the SMMNRA Access and Transportation Goals, in particular the use of shuttle buses, transportation education, transit coordination with surrounding communities, and park and ride facilities. In light of the issues highlighted above, addressing transportation and access will be one of the SMMNRA’s greatest challenges. EPA encourages the NPS and its partners to make transportation and access a priority in the GMP.

Shuttle Bus Services

5. One of the stated Actions Common to All Alternatives is encouraging use of recreational shuttle buses (p 50). However, in the Summary of Alternatives (Table 8-Transportation) the DEIS indicates that shuttle bus services will be explored under only two of the four action alternatives. Table 8-Transportation appears to be in conflict with the Actions Common to All Alternatives. In general, it would be helpful to better understand the shuttle bus system as it is conceived at this point.

Recommendations

- ▶ Clarify whether or not shuttle bus services will be considered under all four action alternatives
- ▶ Clarify whether the transportation goal of encouraging alternative fuels (p 42) will be applied to the shuttle bus service, i.e. clarify whether NPS is committing to using low emission fuels and/or vehicles in the shuttle bus service
- ▶ Identify the potential operators of the shuttle bus system. If NPS is the primary operator, future environmental documentation will need to address fleet maintenance. Please see attachment on Fleet Maintenance Pollution Prevention materials

NPS Fleet

6. The DEIS does not address the NPS fleet or how the transportation goals will be applied to the NPS fleet and NPS employees

- ▶ Recommendation Include a discussion of the NPS fleet and how the transportation goals will be applied to the NPS fleet and NPS employees

5. This information, action, or recommendation has been considered. Table 8 in the DEIS has been modified to show that all alternatives contain a shuttle transportation proposal in some form. The Transportation Goal pertaining to a shuttle operation on page 42 of the draft GMP/EIS has been qualified as "...a low-emission shuttle system...." The NPS will only provide such service by means of a non-federal contractor. The use of private operators to provide recreational services has been included elsewhere as a mission goal for SMMNRA.

6. The park mission goal on page 42 pertaining to alternative fuels has been modified to reflect the park’s adopted goal of converting its fleet to alternative fuels, as well as the availability of financial incentives to NPS personnel who carpool or use public transportation. The mission goal has been rewritten to read: Improve the air quality by encouraging the use of alternative forms of transportation and the use of alternative fuels, including the conversion of park vehicles to low-emission fuel sources and financial incentives for employee use of public transportation.)



COMMENTS

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WATER

Watershed Management

7. Under Actions Common to All Alternatives, the DEIS states that watershed and coastal resources would be protected and preserved through watershed management practices and improvements (p.48). More information is needed on proposed watershed management practices and improvements.

- ▶ Recommendation: Provide greater detail on proposed watershed management practices and improvements.

Parking

8. Under the description of the Preservation Alternative, parking is described as being constructed "with gravel or other pervious material wherever possible" (p.68). However, in the Environmental Consequences section, the DEIS states that new paved parking areas would be constructed (p.327). This discrepancy needs to be addressed. EPA strongly supports the use of pervious materials for parking areas wherever possible because of the benefits of addressing stormwater on-site.

- ▶ Recommendation: Clarify the discrepancy noted above. Wherever possible, use pervious material for parking areas as a component of all of the alternatives.

9. POLLUTION PREVENTION/BUY RECYCLED

One of the GMP Land Use and Ownership Goals is to apply sustainable design and to use ecologically responsible materials (p.40). EPA supports this approach, and, in fact, the Resource Conservation & Recovery Act (RCRA) Section 6002 requires federal, state, local agencies, and their contractors, that use appropriated federal funds to purchase EPA-designated recycled materials, including EPA-designated construction and landscaping products.

- ▶ Recommendation: For further details, please see EPA's web site at <http://www.epa.gov/cpg>, as well as attached materials on Buy-Recycled. Include a commitment to these requirements in the Final EIS.

DOCUMENT STRUCTURE

10. The description of each alternative includes a Summary of Mitigation Measures. To better understand the differences between the mitigation measures for the various alternatives, it would be helpful if the DEIS specifically listed Mitigation Measures Common to All Alternatives and only identified new or additional mitigation measures by alternative.

- ▶ Recommendation: Create a new section that identifies Mitigation Measures Common to All Alternatives.

7. This information, action, or recommendation has been considered. The actions common to all alternatives contained in the DEIS have been modified.

8. This information, action, or recommendation has been considered. The use of pervious versus impervious material in all servation Alternatives contained in the DEIS has been modified.

9. This information, action, or recommendation has been considered. This important planning component for the SMMNRA is too detailed or site-specific to be addressed in the GMP. However, your comments will be retained as a component of the NPS Environmental Management Plan, already under development. Management guidance for this component will be developed later, at a finer scale, in an implementation plan providing more detail than the GMP.

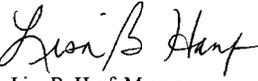
10. This information, action, or recommendation has been considered. The GMP/DEIS text has been changed as follows: A Mitigation Measures Common to All Alternatives has been added to the Summary of Alternatives and Table 9.

COMMENTS

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11. In any action taken, impacts to sensitive resources should be avoided when possible and minimized and mitigated when impacts cannot be avoided. The mitigation measures for Biological Resources and Wetlands states, "The administering agencies would avoid undisturbed native vegetation and wetlands through careful siting of facilities" (p 63) A similar statement should be included for the mitigation measures for Soils and Geology and Water Resources
- ▶ Recommendation In the mitigation measures for Soils and Geology and Water Resources commit to avoiding sensitive resources through the careful siting of facilities

We appreciate the opportunity to review this DEIS. When the Final EIS is completed, please send two copies to me at the address above (Mail Code. CMD-2) If you have any questions or comments, please feel free to contact me or Nova Blazej, the primary staff person working on this project Nova Blazej can be reached at 415-744-2089 or blazej.nova@epa.gov

Sincerely,

 Lisa B Hanf, Manager
 Federal Activities Office

Attachments: Summary of EPA Rating Definitions
 Fleet Maintenance Pollution Prevention Availability of Publications
 2000 Buy-Recycled Series. Construction Products and Landscaping Products

cc. Alan Schmierer, NPS

11. This information, action, or recommendation has been considered. The analysis of environmental consequences contained in the DEIS has been modified under mitigation measures for soils and geology and water resources.



**COMMENTS****RESPONSES****SUMMARY OF EPA RATING DEFINITIONS**

This rating system was developed as a means to summarize EPA's level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the EIS.

ENVIRONMENTAL IMPACT OF THE ACTION***"LO" (Lack of Objections)***

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

"EC" (Environmental Concerns)

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

"EO" (Environmental Objections)

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

"EU" (Environmentally Unsatisfactory)

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

ADEQUACY OF THE IMPACT STATEMENT***Category 1" (Adequate)***

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2" (Insufficient Information)

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analysed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category 3" (Inadequate)

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analysed in the draft EIS, which should be analysed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From EPA Manual 1640, "Policy and Procedures for the Review of Federal Actions Impacting the Environment."

COMMENTS

RESPONSES



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Ventura Fish and Wildlife Office
2493 Portola Road, Suite B
Ventura, California 93003

January 10, 2002

Memorandum

To: Superintendent, Santa Monica Mountains National Recreation Area,
National Park Service, Thousand Oaks, California

From: *[Signature]* Field Supervisor, Ventura Fish and Wildlife Office, Ventura, California

Subject: General Management Plan for the Santa Monica Mountains National Recreation Area, Los Angeles and Ventura Counties, California [L 7617(SAMO)]

We have reviewed your letter, dated September 17, 2001, and received in our office on September 19, 2001, that describes the recently completed General Management Plan (GMP) for the Santa Monica Mountains National Recreation Area (SMMNRA). As your letter states, the adoption of the GMP is a federal action and is therefore subject to section 7 of the Endangered Species Act of 1973, as amended (Act), and the regulations at 50 CFR 402 (Subpart B). Your letter requests our concurrence that adoption of the GMP is not likely to adversely affect any federally listed species or critical habitat. The listed species identified in the GMP as possibly occurring in the planning area include:

Endangered

Southwestern willow flycatcher	<i>Empidonax traillii extimus</i>
Least Bell's vireo	<i>Vireo bellii pusillus</i>
Brown pelican	<i>Pelecanus occidentalis</i>
California least tern	<i>Sterna antillarum browni</i>
Tidewater goby	<i>Eucyclogobius newberryi</i>
Quino checkerspot butterfly	<i>Euphydryas editha quino</i>
Riverside fairy shrimp	<i>Streptocephalus woottoni</i>
Braunton's milk-vetch	<i>Astragalus brauntonii</i>
Lyon's pentachaeta	<i>Pentachaeta lyonii</i>
Salt marsh bird's-beak	<i>Cordylanthus maritimus</i> ssp. <i>maritimus</i>

Threatened

Bald eagle	<i>Haliaeetus leucocephalus</i>
Western snowy plover	<i>Charadrius alexandrinus nivosus</i> (Critical Habitat)
Coastal California gnatcatcher	<i>Polioptila californica californica</i>
California red-legged frog	<i>Rana aurora draytonii</i> (Critical Habitat)

Consultation and Coordination
Comments and Responses - Federal Government Agencies





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Santa Monica Mountains live-forever	<i>Dudleya cymosa</i> ssp. <i>ovatifolia</i>
Marcescent dudleya	<i>Dudleya cymosa</i> ssp. <i>marcescens</i>
Conejo dudleya	<i>Dudleya abramsii</i> ssp. <i>parva</i>
Verity's dudleya	<i>Dudleya verityi</i>

Of the species listed, we have focused our review on those in bold. We have based our decision to focus our review on these species because current information indicates that they are present or may use habitats in the planning area, and could be affected by the activities outlined in the GMP. Consequently, we have reviewed the GMP to assess the potential for adverse effects on these listed species. In addition, Rick Farris of my staff met with Ray Sauvajot of your staff on August 30, 2001, to discuss the section 7 consultation process for the GMP. The GMP contains the following measures to avoid effects to listed species:

1. The GMP includes plans for extensive restoration of disturbed areas currently supporting non-native vegetation. Thus, the implementation of the GMP is likely to result in the creation of more native vegetation that could support listed species than currently exists in the GMP area.
2. New development would be carefully sited to take place only in previously disturbed areas, where native vegetation would not be removed. The new construction would also be sited to incorporate any fuel management within the disturbed areas, so that native vegetation would not have to be removed to protect structures from wildfire.
3. Potential development sites and areas for other activities would be surveyed prior to any construction to ensure that listed species are not present. Survey areas would include fuel management zones.
4. Implementation of the GMP would result in incorporation of additional areas for conservation where some listed species are likely to occur.
5. The GMP proposes a reduction in the intensity of use throughout the SMMNRA. Because we believe that current activities are not adversely affecting listed species, the proposal to lower the intensity of use will provide assurance that future adverse effects are avoided.
6. One of the remaining potential sources of adverse effects to listed species, especially plants, is fuel management and prescribed burning. The National Park Service is developing a separate fuel management plan that is not a part of the GMP and which will be addressed later.

For these reasons, we concur with your conclusion that implementation of the GMP is not likely to adversely affect listed species or critical habitat. Consequently, further consultation, pursuant

COMMENTS

RESPONSES

to section 7(a)(2) of the Endangered Species Act of 1973, as amended, is not required. If the proposed action changes in any manner that may affect a listed species or critical habitat, you must contact us immediately to determine whether additional consultation is required.

Although not required, your letter did not request our input on the effects of the GMP on the federal candidate San Fernando Valley spineflower (*Chorizanthe parryi* var. *fernandina*). The only known population in the vicinity is at Ahmanson Ranch. Because some of the adjacent lands within the GMP area could support the species, we recommend that you consider the San Fernando Valley spineflower in future survey efforts and in planning for protection of sensitive species.

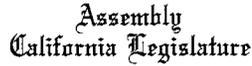
We look forward to working with you on future projects and commend the National Park Service on its efforts with the GMP. If you have any questions, please contact Mr. Farris at (805) 644-1766.



COMMENTS

RESPONSES

STATE CAPITOL
 PO BOX 942849
 SACRAMENTO, CA 94249-0041
 (916) 319-2041
 FAX (916) 319-2141
 DISTRICT OFFICE
 6355 TOPANGA CANYON BLVD
 SUITE 205
 WOODLAND HILLS, CA 91367-2108
 (818) 596-4141
 (310) 395-3414
 FAX (818) 596-4150



FRAN PAVLEY
 ASSEMBLY MEMBER, FORTY-FIRST DISTRICT

CHAIR, BUDGET SUBCOMMITTEE
 ON RESOURCES (NO. 3)
 COMMITTEE MEMBER:
 BUDGET
 EDUCATION
 LOCAL GOVERNMENT
 NATURAL RESOURCES
 WATER, PARKS AND WILDLIFE

May 30, 2001

Superintendent Arthur Eck
 NATIONAL PARK SERVICE
 401 W Hillcrest Drive
 Thousand Oaks, CA 91360-4223

Re: **GMP and EIS**
Santa Monica Mountains National Recreation Area

Dear Superintendent Eck:

Essentially the entire Santa Monica Mountains National Recreation Area (SMMNRA) lies within the 41st Assembly District. I am pleased to see the GMP being updated in light of the growth and substantial changes in the region over the past 20 years, including the incorporation of the new cities of Malibu, Calabasas, Agoura Hills, and Westlake Village, all of which are proximate to the park.

- 1.

I support the Preferred Alternative Plan, which designates 80% of the park area as low-intensity, 15% as moderate, and 5% as high intensity uses which are concentrated primarily in areas which are already disturbed or adjacent to Pacific Coast Highway.
--

I respectfully offer the following specific comments on the GMP:

- 2.

1	I strongly support the GMP's intent to reintroduce the endangered southern steelhead trout back into Solstice Canyon, Malibu Creek and Arroyo Sequit.
---	---
- 3.

2	Critical habitat linkages and wildlife movement corridors are best identified and protected in the Preferred Alternative
---	--
- 4.

3	Related to wildlife migration, the maps need to reflect the acquisition in February of the Abrams property in Liberty Canyon.
---	---
- 5.

4	Lighting along Mulholland Highway should be eliminated or reduced to the maximum extent possible in order to encourage wildlife migration.
---	--

- 1. This statement or opinion has been considered. No change has been made to the GMP/EIS. The NPS welcomes the continuing involvement of the public in the management of the SMMNRA and appreciates the thoughtful and committed input received on the GMP/EIS.
- 2. Thank you for your comment.
- 3. Thank you for your comment.
- 4. This information, action, or recommendation has been considered. The maps contained in the FEIS have been modified.
- 5. These comments are consistent with the mission goals and preferred alternative of the Draft General Management Plan (page 42).

COMMENTS

RESPONSES

- | | |
|-----|---|
| 5. | Rehabilitation of 415 PCH as a visitor orientation center, as included in the Preferred Alternative, is a project that I am particularly interested in seeing go forward. I have placed a member's request in this year's state budget to help with its funding. |
| 6. | 6. If shuttle services are considered to transport people in the park, all such vehicles should use alternative clean fuels |
| 7. | 7. Previously disturbed areas in the park should be returned to their natural condition. |
| 8. | 8. The proposed expansion of the Cheeseboro Canyon trailhead to provide more parking has the potential of increasing traffic substantially on the very narrow and substandard Chesebro Road, with its one-lane bridge. I have concerns about the ability of this road to accommodate any additional traffic. |
| 9. | 9. The Santa Monica Mountains North Area Plan was approved by the Los Angeles County Board of Supervisors in October of 2000. This information should be updated in the GMP |
| 10. | 10. Los Angeles County is in the process of updating its own General Plan. Included in the update of their Open Space Element is a consultant's recommendation that the entire SMMNRA be designated a Significant Ecological Area. Although it is early in their process, I support this recommendation in the strongest possible terms. This is a very important planning tool for the County that will provide the needed level of review to all future development applications. |
| 11. | 11. Federal legislation is pending that will extend the SMMNRA boundaries north to the Ventura County line. This legislation should be monitored, and, assuming passage, noted in the GMP |
| 12. | 12. If this boundary change occurs, the Ahmanson Ranch development will be immediately adjacent to the northern edge of the Recreation Area. I believe that it would be appropriate to include some discussion in the GMP of the potential impact on and interaction of Ahmanson Ranch with the SMMNRA, including whether Ahmanson should be considered for inclusion within the SMMNRA boundaries. |
| 13. | 13. Equestrian trails should be provided and connected so that equestrians can travel throughout the park. There should also be an overnight equestrian campground. Public stables should be considered in an appropriate location to facilitate the enjoyment of the park by horseback. |
| 14. | 14. I did not find any discussion of trails usage and management in the GMP; ex., what are the best management practices to address the differing needs and expectations of hikers, runners, equestrians, mountain bikers and other users of the trails. If not in the GMP, where would these policies be set forth. |

6. This information, action or recommendation has been considered. While consistent with the Transportation Goals that serve as a basis for the GMP, this important planning component for the SMMNRA is too detailed or site-specific to be addressed here. However, your comment will be retained for use in the development of a Transportation Plan that would be used to assess and guide the potential implementation of a shuttle system.
7. This comment is consistent with the preferred alternative proposed in this GMP/EIS. (See "Actions Common to All Alternatives" section).
8. This information, action, or recommendation has been considered. This important planning component for the SMMNRA is too detailed or site-specific to be addressed in the GMP. However, your comments will be retained for use in future planning efforts. Management guidance for this component will be developed later, at a finer scale, in an implementation plan providing more detail than the GMP.
9. This information, action, or recommendation has been considered. The sentence on page 180 under Land Use Planning has been updated.
10. This information, action, or recommendation has been considered. Decisions involving this important planning component for the SMMNRA are outside the scope of the GMP and accompanying DEIS analysis. Another entity or agency holds the management or decision making authority for this component. The analysis contained in the GMP/EIS will be available to assist other SMMNRA decision makers, however, decisions involving this component will not be made by the NPS in the ROD for the GMP/EIS.
11. As of the time that this analysis was prepared, the proposed legislation was still pending in the U.S. Congress.
12. This information, action, or recommendation has been considered. The analysis of environmental consequences contained in the DEIS has been modified.





COMMENTS

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15. Lastly, I oppose the Recreation Alternative. Designating 75% of the park as either moderate-or high-intensity areas is totally inconsistent with the 1978 Congressional statement recognizing the need to "preserve [the park's] scenic, natural and historic setting and its public health value as an air shed for the Southern California metropolitan area."

16. The Recreation Alternative provides the most adverse environmental impacts of all five Alternatives. New facilities development that would be allowed under this Alternative, including cut and fill, grading, and more impermeable surfaces and pavement, would impact soils and geology in the park's floodplains by increasing and redirecting water runoff in a region that is already subject to erosion, landslides, debris flows, and liquefaction. It would inappropriately intensify the uses of this sensitive and unique resource to the severe and irremediable detriment of all of its inhabitants and users, both two-legged and otherwise.

Thank you for the opportunity to comment on the GMP and EIS. I look forward to the development of its final version.

Sincerely,

Fran Pavley, Assemblymember
FP:lr

13. This information, action, or recommendation has been considered. Both the preferred and the recreation alternatives have been amended to include the overnight trail camps proposed in the Santa Monica Mountains Area Recreational Trails Coordination Project Report. The precise implementation of the camps will be established in specific development plans that are beyond the scope of this document in detail. The National Park Service further agrees that the private sector plays a critical role in offering direct and indirect recreational services in the Santa Monica Mountains, such as riding stables. Moreover, it is Service policy to encourage the development of private recreation services for the general public when and as appropriate, rather than compete with them. Therefore, a Mission Goal, under the Visitor Experience section beginning on page 41, has been added to ensure that this principle is prominently reflected in park planning and policies.

Additional information concerning the current role played by private recreation vendors has been incorporated in the descriptive text of the GMP where pertinent. Other remarks speak to concerns more detailed than the scope of the General Management Plan. They will be used in the formulation of a Draft Trail Management Plan, expected for release sometime in late 2002 or early 2003.

14. These concerns will be addressed in the formulation of a Draft Trail Management Plan, expected for release sometime in late 2002 or early 2003.

15. This comment is consistent with the preferred alternative proposed in this GMP/EIS.

16. This statement or opinion has been considered. No change has been made to the GMP/EIS. The NPS welcomes the continuing involvement of the public in the management of the SMMNRA and appreciates the thoughtful and committed input received on the GMP/EIS.

COMMENTS

RESPONSES

STATE OF CALIFORNIA - THE RESOURCES AGENCY
CALIFORNIA COASTAL COMMISSION
SOUTH CENTRAL COAST AREA
88 SOUTH CALIFORNIA ST., SUITE 200
VENTURA, CA 93001
(805) 641 9142

GRAY DAVIS, Governor



February 28, 2001

Arthur Eck, Superintendent
Santa Monica Mountains National Recreation Area
401 West Hillcrest Drive
Thousand Oaks, CA 91360

Subject: Draft General Management Plan & Environmental Impact Statement--SMMNRA

Dear Mr. Eck:

1.

Commission staff has reviewed the subject plan for the Santa Monica Mountains National Recreation Area. The Park Service's General Management Plan is subject to the federal consistency requirements of the federal Coastal Zone Management Act (CZMA). Pursuant to 15 CFR 930.34(c) of the regulations implementing the CZMA, the Commission staff believes that the General Management Plan for Santa Monica Mountains National Recreation Area will have reasonably foreseeable coastal effects and therefore, may require a consistency determination. The federal regulations define a federal agency activity as follows:

The term "Federal agency activity" means any functions performed by or on behalf of a Federal agency in the exercise of its statutory responsibilities. This encompasses a wide range of Federal agency activities which initiate an event or series of events where coastal effects are reasonably foreseeable, e.g., rulemaking, planning, physical alteration, exclusion of uses. The term "Federal agency activity" does not include the issuance of a federal license or permit to an applicant or person (see Subparts D and E of this part) or the granting of federal assistance to an applicant agency (see Subpart F of this part). (15 CFR 930.31(e), emphasis added.)

The Commission staff believes that the General Management Plan will initiate activities that could potentially affect public access to the shoreline, recreational use of the coastal zone, and environmentally sensitive habitat areas. The Park Service should submit its General Plan along with a consistency determination. A consistency determination is a brief statement that the project is consistent with the California Coastal Management Program (CCMP), an analysis of the relevant Coastal Act policies, a detailed project description, and any data and information necessary to support the consistency determination. The consistency determination must be submitted 90 days prior to the federal agencies final approval of the plan. Upon receipt of a complete consistency determination, the Commission has 60 days to concur or object to the consistency determination or request a 15-day extension (which the federal agency must grant). If the Commission does not act within this time period, the Park Service can assume that the Commission concurs with the consistency determination.

1. This information, action, or recommendation has been considered. No change has been made to the GMP/EIS. A consistency determination has been prepared to accompany the final GMP/EIS.

Consultation and Coordination
Comments and Responses - State Government Agencies





COMMENTS

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February 28, 2001
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With regard to the text of the GMP/EIS, staff would also like to offer the following specific comments.

1. In the Actions Common to all Alternatives section, the GMP/EIS states that.

CALTRANS and the City of Malibu would be encouraged to develop a policy of restricting roadside parking along PCH to encourage the use of off-street parking facilities for pedestrian safety and promote transit use. (Page 50)

2. While we certainly support improved transit service to the area as well as public safety, the Commission has found that the loss of existing, on-street, public parking through such restrictions adversely impacts public access and recreational opportunities. The goal of encouraging the use off-street parking for access and recreation would be better implemented through the significant reduction or elimination of use fees for such facilities.

2. The GMP/EIS (On Page 54) provides, as a mitigation measure for impacts to water resources, that: "A construction storm water management plan would be prepared by a qualified individual for all construction activities affecting one or more acres to minimize soil disturbance". Given the steeply sloping terrain, erodible soils, and extremely

3. sensitive resources that characterize much of the SMMNRA, a construction storm water management plan as well as a permanent drainage and erosion control plan should be prepared for projects affecting area less than one acre as well. (We would note that this same reference is repeated in several areas of the plan. We would have the same comment in each instance.)

4. 3. In the discussion of the Preferred Alternative (Page 61), the GMP/EIS states that: "The campground at Leo Carrillo State Beach would be rehabilitated to integrate the campground with natural riparian processes". Please clarify what actions this rehabilitation would include. For instance, would the campsites be redesigned or relocated to provide buffer area outside the riparian areas? Would the riparian areas be restored?

4. The GMP/EIS states that:

Coastal Act policies promote environmentally sustainable development in the mountains, and development proposals are analyzed for compliance with these policies. (Page 179)

We would recommend that this statement be modified to read as follows:

5. Coastal Act policies require, among other things, the protection of environmental and visual resources, as well as the provision of public access and recreational opportunities. Development proposals are analyzed for compliance with these policies.

2. This statement or opinion has been considered. No change has been made to the GMP/EIS. The NPS welcomes the continuing involvement of the CCC in the management of the SMMNRA and appreciates the thoughtful and committed input received on the GMP/EIS.

3. This information, action, or recommendation has been considered. This important planning component for the SMMNRA is too detailed or site-specific to be addressed in the GMP. However, the comments will be retained for use in future planning efforts. Management guidance for this component will be developed later, at a finer scale, in an implementation plan providing more detail than the GMP (i.e., Stormwater Management Plan, site-specific Comprehensive Development Plans).

4. This information, action, or recommendation has been considered. This important planning component for the SMMNRA is too detailed or site-specific to be addressed in the GMP. However, the comments will be retained to be used in future planning efforts. Management guidance for this component will be developed later, at a finer scale, in an implementation plan providing more detail than the GMP.

5. The National Park Service concurs. All alternatives presented in the plan, including the preferred alternative, are intended to fulfill the "mission goal" stated on page 40 of the draft General Management Plan.

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Mr. Arthur Eck
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5. We would recommend that the last sentence on Page 179 (continuing to Page 180) be modified to read as follows:

6. In Los Angeles County, authority for coastal development permits would be transferred from the California Coastal Commission to Los Angeles County upon completion and certification of their Santa Monica Mountains LCP, which is anticipated within the next two to three years.
7. 6. All references in this section to the "Malibu LCP" should be modified to "Malibu/Santa Monica Mountains Land Use Plan (LUP). The LUP was certified by the Coastal Commission in 1987. The LUP policies provide guidance to the Commission in reviewing development proposals, although the ultimate standard of review is the Coastal Act. A Local Coastal Program (LCP) must include both an LUP and an Implementation Program. To date, no Implementation Program has been certified for the Santa Monica Mountains.
8. 7. The GMP/EIS discusses land use planning efforts in the City of Malibu on Page 193. We would comment that reference should be made to the provisions of Assembly Bill 988 in this section. AB 988, effective 1/1/01, amended the Coastal Act to establish mandatory timelines and to delegate responsibility for preparation and certification of a LCP for the City of Malibu to the Coastal Commission. Under this law, the Commission will prepare and certify the City of Malibu LCP by no later than September 15, 2002.
8. On Page 218, the GMP/EIS contains a discussion (Page 218) of the Coastal Zone Management Act and the Coastal Act as they apply to the analysis of impacts to Water Resources. These laws also apply to the GMP/EIS analyses regarding geology, flood hazard, biological resources, archaeology, land use, traffic, and public services.
- 9.

Thank you for the opportunity to review the subject General Management Plan and Environmental Impact Statement. If you have questions on the federal consistency procedures, please contact James Raives at (415) 904-5292. If you have any other questions, please feel free to contact me at (805) 641-0142.

Very Truly Yours,



Barbara J. Carey
Coastal Program Analyst

RESPONSES

6. This information, action, or recommendation has been considered. The description of the affected environment contained in the DEIS has been modified.
7. The GMP/EIS text has been changed to read "Malibu/Santa Monica Mountains Land Use Plan (LUP)".
8. This comment references legislation requiring the Coastal Commission to complete the Malibu/Santa Monica Mountains LUP. An LUP will be completed within two years and will serve as a basis for regulating land use in the coastal zone. Therefore, the NPS did not see the need to reference this legislation in the GMP/EIS.
9. Modification has been made to the GMP/EIS to include the resources mentioned in this comment under the Coastal Zone Management Act and the Coastal Act.





COMMENTS

RESPONSES

STATE OF CALIFORNIA -- THE RESOURCES AGENCY

GRAY DAVIS, Governor

OFFICE OF HISTORIC PRESERVATION
DEPARTMENT OF PARKS AND RECREATION



P.O. BOX 942896
SACRAMENTO, CA 94296-0001
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January 24, 2001

REPLY TO: NPS950717A

Arthur E. Eck, Superintendent
National Park Service
Santa Monica Mountains National Recreation Area
401 West Hillcrest Drive
THOUSAND OAKS CA 91360-4207

Re: Draft General Management Plan and Environmental Impact Statement for the
Santa Monica Mountains National Recreation Area, Los Angeles County.

Dear Mr. Eck:

Thank you for submitting to our office your January 5, 2001 letter and Draft General Management Plan and Environmental Impact Statement (DGMP/EIS) regarding the Santa Monica Mountains National Recreation Area (SMMNRA) in Los Angeles County. The purpose of the DGMP/EIS is to provide an updated framework for the collective management of the SMMNRA and to assess its potential environmental consequences as required by law. The DGMP/EIS is being prepared in accordance with a directive set forth in the National Parks and Recreation Act of 1978. The current document is a revision of the last plan that was released in 1982. The DGMP/EIS examines the effects of five management alternatives for the SMMNRA including a preferred alternative that is described in pages 278 - 285.

The National Park Service (NPS) is seeking our comments on the DGMP/EIS in accordance with guidance set forth in 36 CFR 800, regulations implementing Section 106 of the National Historic Preservation Act. Our review of the DGMP/EIS leads us to conclude the following regarding its content:

1.
 - The identification of historic properties within the boundaries of the SMMNRA appears to be adequate and in compliance with guidance set forth in 36 CFR 800.4.
2.
 - The summary of proposed treatments for cultural resources located within the boundaries of the SMMNRA, as described for the preferred alternative, appear to be appropriate and in compliance with guidance set forth in the National Historic Preservation Act of 1966. We are also pleased to note that the *Secretary of the Interior's Standards for the Treatment of Historic Properties* (1995) will be followed for any projects affecting historic or cultural resources at the Paramount Ranch, the Peter Strauss Ranch, Rancho Sierra Vista, and Solstice Canyon.
 - We note on page 13 of the DDMP/EIS that additional public hearings on the proposed project will be held in February 2001. We are encouraged by the level of public input undertaken to this point in the project (as noted on page

1. This statement or opinion has been considered. No change has been made to the GMP/EIS. The NPS welcomes continuing involvement of the SHPO in the management of the SMMNRA and appreciates the thoughtful and committed input received on the GMP/EIS.
2. This statement or opinion has been considered. No change has been made to the GMP/EIS. The NPS welcomes continuing involvement of the SHPO in the management of the SMMNRA and appreciates the thoughtful and committed input received on the GMP/EIS.

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403), and hope that the anticipated February meetings produce a broad range of public comment and involvement. It is hoped that your final draft of the management plan/EIS will reflect the level and scope of this public involvement and its influence on the final decision regarding the preferred alternative.

Thank you again for seeking our comments on your project. If you have any questions, please contact staff historian Clarence Caesar at (916) 653-8902.

Sincerely,



Dr. Knox Mellon
State Historic Preservation Officer



COMMENTS

RESPONSES

SOUTHERN CALIFORNIA



ASSOCIATION OF GOVERNMENTS

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Richard Dingo Lake Forest - Mike Duha La Habra -
Shirley McCracken Anaheim - Bev Perry Brea
Riverside County: Bob Bauer Riverside County -
Pat Levenhage Riverside - Greg Potts Calverly
City - Andrea Puga Corona - Ron Roberts
Temecula - Charles White Moreno Valley
San Bernardino County: Joe Mikels San
Bernardino County - Bill Alexander Rancho
Cunamunga - Jim Bagley Westyutite Palm - David
Bilheimer Fontana - Lee Ann Garcia Grand Terrace -
Cynthia Newton-Rose Chino Hills - Josh Niles
San Bernardino
Ventura County: Judy Mikels Ventura County -
Dennis De Paula San Bernardino - Giles Beerna
Simi Valley - Tom Young Port Hueneme
Riverside County Transportation Commission:
Robin Lowe Hemet
Ventura County Transportation Commission:
Bill Dunn Simi Valley

February 20, 2001

Mr Arthur E Eck
Superintendent
Santa Monica Mountains NRA
401 West Hillcrest Drive
Thousand Oaks, CA 91360

RE Comments on the Draft General Management Plan / Environmental
Impact Statement for the Santa Monica Mountains National
Recreation Area - SCAG No. 1 20010057

Dear Mr Eck

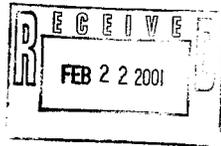
Thank you for submitting the Draft General Management Plan / Environmental
Impact Statement (GMP/EIS) for the Santa Monica Mountains National
Recreation Area to SCAG for review and comment As areawide clearinghouse
for regionally significant projects, SCAG assists cities, counties and other
agencies in reviewing projects and plans for consistency with regional plans

The attached detailed comments are meant to provide guidance for considering
the proposed project within the context of our regional goals and policies If you
have any questions regarding the attached comments, please contact me at
(213) 236-1867 Thank you

Sincerely,

Handwritten signature of Jeffrey M. Smith

JEFFREY M SMITH, AICP
Senior Planner
Intergovernmental Review



Santa Monica Mountains National Recreation Area
GMP/EIS

COMMENTS

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February 20, 2001
Mr Arthur E Eck
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**COMMENTS ON THE
DRAFT
GENERAL MANAGEMENT PLAN /
ENVIRONMENTAL IMPACT STATEMENT
FOR THE
SANTA MONICA MOUNTAINS NATIONAL RECREATION AREA
SCAG NO. I 20010057**

PROJECT DESCRIPTION

The purpose of the proposed Project is to provide an updated framework for the management of the Santa Monica Mountains National Recreation Area (SMMNRA). The proposed Project considers and analyzes five alternatives that would achieve a number of preferred actions. The SMMNRA generally covers the Santa Monica Mountain region in southern California, and encompasses more than 150,000-acres.

INTRODUCTION TO SCAG REVIEW PROCESS

The document that provides the primary reference for SCAG's project review activity is the Regional Comprehensive Plan and Guide (RCPG). The RCPG chapters fall into three categories: core, ancillary, and bridge. The Growth Management (adopted June 1994), Regional Transportation (adopted April 1998), Air Quality (adopted October 1995), Hazardous Waste Management (adopted November 1994), and Water Quality (adopted January 1995) chapters constitute the core chapters. These core chapters respond directly to federal and state planning requirements. The core chapters constitute the base on which local governments ensure consistency of their plans with applicable regional plans under CEQA. The Air Quality and Growth Management chapters contain both core and ancillary policies, which are differentiated in the comment portion of this letter. The Regional Transportation Plan (RTP) constitutes the region's Transportation Plan. The RTP policies are incorporated into the RCPG.

Ancillary chapters are those on the Economy, Housing, Human Resources and Services, Finance, Open Space and Conservation, Water Resources, Energy, and Integrated Solid Waste Management. These chapters address important issues facing the region and may reflect other regional plans. Ancillary chapters, however, do not contain actions or policies required of local government. Hence, they are entirely advisory and establish no new mandates or policies for the region.

Bridge chapters include the Strategy and Implementation chapters, functioning as links between the Core and Ancillary chapters of the RCPG.



**COMMENTS****RESPONSES**

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Each of the applicable policies related to the proposed project are identified by number and reproduced below in italics followed by SCAG staff comments regarding the consistency of the Project with those policies.

General SCAG Staff Comments

1. The Final EIR should address the relationships (consistency with core policies and support of ancillary policies) to SCAG's Regional Comprehensive Plan and Guide, utilizing commentary from the following detailed SCAG staff comments. The response should also discuss any inconsistencies between the proposed project and applicable regional plans. We suggest that you identify the specific policies, by policy number, with a discussion of consistency or support with each policy

CONSISTENCY WITH REGIONAL COMPREHENSIVE PLAN AND GUIDE POLICIES

The Growth Management Chapter (GMC) of the Regional Comprehensive Plan and Guide contains a number of policies that are particularly applicable to the SMMNRA GMP/EIS.

Core Growth Management Policies

- 3.01 *The population, housing, and jobs forecasts, which are adopted by SCAG's Regional Council and that reflect local plans and policies, shall be used by SCAG in all phases of implementation and review.*

SCAG staff comments. The Draft GMP/EIS on page 195 and in the Environmental Consequences Chapter references SCAG's growth projections and includes a short discussion of the relationship of the proposed Project to the growth forecasts for each alternative. The Project is consistent with this core RCPG policy.

- 3.03 *The timing, financing, and location of public facilities, utility systems, and transportation systems shall be used by SCAG to implement the region's growth policies.*

SCAG staff comments. The Draft GMP/EIS, on page 12, includes a discussion on the implementation of the proposed Project. The Project could be implemented over a period of ten or more years. Implementation of the proposed Project depends on factors such as budget restrictions, requirements for additional information, legal compliance and/or competing priorities. The Project is

1. We appreciate the extensive comments provided by the Southern California Association of Governments (SCAG) by letter dated February 20, 2001. It is important to emphasize that the GMP is supportive and/or consistent with numerous regional goals and policies as specifically outlined in the letter. It is outside the scope and purview of the GMP to completely address all of the specific policies and actions contemplated within the many local and regional plans. However, locally adopted plans, including the County of Los Angeles Santa Monica Mountains North Area Plan (pending adoption in October 2001), are generally consistent with the long term park management approach contained in the GMP. The GMP has been developed in cooperation with affected local jurisdictions. Your comments will be retained to use in future planning efforts. Additional responses on specific policies in question are provided below.

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Mr Arthur E Eck
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consistent with this core RCPG policy.

The **Regional Transportation Plan (RTP)** also has goals, objectives, policies and actions pertinent to this proposed project. This RTP links the goal of sustaining mobility with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly development patterns, and encouraging fair and equitable access to residents affected by socio-economic, geographic and commercial limitations. Among the relevant goals, objectives, policies and actions of the RTP are the following:

Core Regional Transportation Plan Policies

4.01 *Transportation investments shall be based on SCAG's adopted Regional Performance Indicators.*

2. SCAG staff comments. The Draft GMP/EIS does not address Transportation Investments based on the following SCAG's adopted Regional Performance Indicators:

Mobility - *Transportation Systems should meet the public need for improved access, and for safe, comfortable, convenient and economical movements of people and goods.*

- *Average Work Trip Travel Time in Minutes – 22 minutes*
- *PM Peak Highway Speed – 33 mph*
- *Percent of PM Peak Travel in Delay (All Trips) – 33%*

Accessibility - *Transportation Systems should ensure the ease with which opportunities are reached. Transportation and land use measures should be employed to ensure minimal time and cost.*

- *Work Opportunities within 25 Minutes – 88%*

Environment - *Transportation Systems should sustain development and preservation of the existing system and the environment. (All Trips)*

- *Meeting Federal and State Standards – Meet Air Plan Emission Budgets*

Reliability - *Reasonable and dependable levels of service by mode. (All Trips)*

- *Transit – 63%*
- *Highway – 76%*

Safety - *Transportation Systems should provide minimal, risk, accident, death and injury. (All Trips)*

2. This information, action, or recommendation has been considered. With regard to Core Regional Transportation Policy 4.01, the GMP is not intended to comprehensively address Transportation Investments in the way that a locally adopted General Plan might. Among the eight core RTP objectives, the GMP is supportive of the Accessibility, Environment, and Livable Communities objectives while remaining neutral with regard to the other objectives. The GMP supports the RTP objectives by advocating the development of transportation alternatives and the reduction of vehicle miles traveled. It is not within the scope or purview of the GMP to address objectives such as average work trip travel time, delay times and so forth in detail, given that the focus of the GMP is on preserving natural and cultural resources and providing recreational opportunities. Your comments will be retained for use in future planning efforts.





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- *Fatalities Per Million Passenger Miles – 0 008*
- *Injury Accidents – 0 929*

Livable Communities - *Transportation Systems should facilitate Livable Communities in which all residents have access to all opportunities with minimal travel time. (All Trips)*

- *Vehicle Trip Reduction – 1.5%*
- *Vehicle Miles Traveled Reduction – 10.0%*

Equity - *The benefits of transportation investments should be equitably distributed among all ethnic, age and income groups. (All trips)*

- *Low-Income (Household Income \$12,000) Share of Net Benefits – Equitable Distribution of Benefits*

Cost-Effectiveness - *Maximize return on transportation investment. (All Trips)*

- *Net Present Value – Maximum Return on Transportation Investment*
- *Value of a Dollar Invested – Maximum Return on Transportation Investment*

The Final GMP/EIS should address the manner in which the Project is supportive of or detracts from the achievement of the eight core RTP objectives. Based on the information provided, we are unable to determine whether the Project is consistent with this core RCPG policy

- 4.02 *Transportation investments shall mitigate environmental impacts to an acceptable level.*

SCAG staff comments. The Draft GMP/EIS in the Environmental Consequences Chapter identifies transportation impacts, for each alternative, and details the measures to mitigate these impacts. The Project is consistent with this core RCPG policy.

- 4.04 *Transportation Control Measures shall be a priority.*

SCAG staff comments. The Draft GMP/EIS includes a mitigation measure that recommends the promotion and development of transit operations and ridesharing programs. The Project is consistent with this core RTP policy.

- 4.16 *Maintaining and operating the existing transportation system will be a priority over expanding capacity*

3. SCAG staff comments. The Draft GMP/EIS suggests that the existing transportation system will not be expanded. Mitigation measures recommend the

3. This statement or opinion has been considered. No change has been made to the GMP/EIS. The NPS welcomes the continuing involvement of the public agencies in the management of the SMMNRA and appreciates the thoughtful and committed input received on the GMP/EIS.

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- 3. provision of a designated left turn lane to minimize traffic conflicts and easier access. The Project is consistent with this core RTP policy

GMC POLICIES RELATED TO THE RCPG GOAL TO IMPROVE REGIONAL STANDARD OF LIVING

The Growth Management goals to develop urban forms that enable individuals to spend less income on housing cost, that minimize public and private development costs, and that enable firms to be competitive, strengthen the regional strategic goal to stimulate the regional economy. The evaluation of the proposed project in relation to the following policies would be intended to guide efforts toward achievement of such goals and does not infer regional interference with local land use powers

- 3.05 *Encourage patterns of urban development and land use, which reduce costs on infrastructure construction and make better use of existing facilities.*

SCAG staff comments. The Draft GMP/EIS in the Environmental Consequences Chapter includes a discussion on Public Services and Utilities for each alternative. The proposed Project is anticipated to have a negligible impact on utilities, services and systems. Mitigation measures recommended will reduce impacts to services and utilities. The Project is supportive of this ancillary RCPG policy.

- 3.08 *Encourage subregions to define economic strategy to maintain economic viability of the subregion, including the development and use of marketing programs, and other economic incentives, which support the attainment of subregional goals and policies.*

- 4. SCAG staff comments. The Draft GMP/EIS does not address the economic aspects of the proposed project. It would be helpful if the Final GMP/EIS would provide a discussion and address the manner in which the Project is supportive of or detracts from the achievement of this policy. Based on information provided in the Draft GMP/EIS, we are therefore unable to determine whether the Project is supportive of this ancillary RCPG policy

- 3.09 *Support local jurisdictions' efforts to minimize the cost of infrastructure and public service delivery, and efforts to seek new sources of funding for development and the provision of services.*

SCAG staff comments. See SCAG staff comments on Policy 3.05 The Project is supportive of this ancillary RCPG policy

- 4. This information, action, or recommendation has been considered. Although the GMP does not address economic strategies, marketing programs and other economic incentives as included in ancillary policy 3.08, the presence of large natural areas and recreational opportunities in the Santa Monica Mountains enhances the quality of life and the economy of surrounding communities. Further, the socioeconomic impacts of the alternatives are addressed in the GMP/EIS, in the sections covering Environmental Consequences. No change has been made to the GMP/EIS.





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Mr. Arthur E. Eck
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GMC POLICIES RELATED TO THE RCPG GOAL TO IMPROVE THE REGIONAL QUALITY OF LIFE

The Growth Management goals to attain mobility and clean air goals and to develop urban forms that enhance quality of life, that accommodate a diversity of life styles, that preserve open space and natural resources, and that are aesthetically pleasing and preserve the character of communities, enhance the regional strategic goal of maintaining the regional quality of life. The evaluation of the proposed project in relation to the following policies would be intended to provide direction for plan implementation, and does not allude to regional mandates.

- 3.12 *Encourage existing or proposed local jurisdictions' programs aimed at designing land uses which encourage the use of transit and thus reduce the need for roadway expansion, reduce the number of auto trips and vehicle miles traveled, and create opportunities for residents to walk and bike.*

SCAG staff comments. See SCAG staff comments on Policy 4.06. The Draft GMP/EIS, on page 48 (and Table 7), provides a discussion on actions common to all alternatives. These actions includes a number of management areas that recommend the protection, preservation and development items aimed at designing uses which encourage the use of transit, development of walking trails, reduce the need for roadway expansion and auto trips. The Project is supportive of this ancillary RCPG policy.

- 3.18 *Encourage planned development in locations least likely to cause adverse environmental impact.*

SCAG staff comments. The Project is proposed in a manner that will minimize environmental impacts. Mitigation measures included in the Draft GMP/EIS have been developed to address identified impacts. The National Park Service should carefully consider the adequacy of these measures. The Project is supportive of this ancillary RCPG policy.

- 3.19 *SCAG shall support policies and actions that preserve open space areas identified in local, state, and federal plans.*

SCAG staff comments. The Draft GMP/EIS in the Summary, Purpose and Need and The Park Chapters includes a number of goals and objectives, and addresses the subject of the preservation of open space. The Project is supportive of this ancillary RCPG policy.

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3.20 *Support the protection of vital resources such as wetlands, groundwater recharge areas, woodlands, production lands, and land containing unique and endangered plants and animals.*

SCAG staff comments. The Draft GMP/EIS in the Environmental Consequences Chapter includes discussions on vegetation, wildlife, habitat connectivity and wetlands for each alternative. The proposed Project will have impacts on some of the aforementioned items. Mitigation measures recommended for each alternative specifically address these items. The Project is supportive of this ancillary RCPG policy.

3.21 *Encourage the implementation of measures aimed at the preservation and protection of recorded and unrecorded cultural resources and archaeological sites.*

SCAG staff comments. The Draft GMP/EIS in the Environmental Consequences Chapter addresses potential impacts to historic structures, cultural landscapes, ethnography and archaeological resources for each alternative. The Draft GMP/EIS recommends measures to address impacts to cultural resources for each alternative. The Project is supportive of this ancillary RCPG policy

3.22 *Discourage development, or encourage the use of special design requirements, in areas with steep slopes, high fire, flood, and seismic hazards.*

SCAG staff comments. The Draft GMP/EIS in the Environmental Consequences Chapter identifies potential impacts related to soils and geologic hazards for each alternative. The Draft GMP/EIS recommends mitigation measures to address identified impacts through the implementation of geotechnical evaluations, construction requirements, building codes and/or project design. The Project is supportive of this ancillary RCPG policy.

3.23 *Encourage mitigation measures that reduce noise in certain locations, measures aimed at preservation of biological and ecological resources, measures that would reduce exposure to seismic hazards, minimize earthquake damage, and to develop emergency response and recovery plans*

SCAG staff comments. See SCAG staff comments on policies 3 18, 3.20, 3.21 and 3 22 The Draft GMP/EIS on page 215, acknowledges potential noise impacts related to construction and operational activities, and mobile sources The impacts are not considered long term, and thus, dismissed from further consideration. The Project is supportive of this ancillary RCPG policy



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GMC POLICIES RELATED TO THE RCPG GOAL TO PROVIDE SOCIAL, POLITICAL, AND CULTURAL EQUITY

The Growth Management Goal to develop urban forms that avoid economic and social polarization promotes the regional strategic goal of minimizing social and geographic disparities and of reaching equity among all segments of society. The evaluation of the proposed project in relation to the policy stated below is intended guide direction for the accomplishment of this goal, and does not infer regional mandates and interference with local land use powers.

3.27 *Support local jurisdictions and other service providers in their efforts to develop sustainable communities and provide, equally to all members of society, accessible and effective services such as: public education, housing, health care, social services, recreational facilities, law enforcement, and fire protection.*

SCAG staff comments. See SCAG staff comments on Policy 3.05. The Project is supportive of this ancillary RCPG policy.

AIR QUALITY CHAPTER CORE ACTIONS

The Air Quality Chapter (AQC) core actions that are generally applicable to the Project are as follows:

5.07 *Determine specific programs and associated actions needed (e.g., indirect source rules, enhanced use of telecommunications, provision of community based shuttle services, provision of demand management based programs, or vehicle-miles-traveled/emission fees) so that options to command and control regulations can be assessed.*

SCAG staff comments. See SCAG staff comments on Policy 4.04. The Project is consistent with this core RCPG policy.

5.11 *Through the environmental document review process, ensure that plans at all levels of government (regional, air basin, county, subregional and local) consider air quality, land use, transportation and economic relationships to ensure consistency and minimize conflicts.*

SCAG staff comments. The Draft GMP/EIS, on pages 118 and 214, addresses impacts to air quality. Potential impacts related to construction and operational activities, and mobile sources, were not considered long term, and thus, dismissed

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from further consideration. The Project is consistent with this core RCPG policy.

WATER QUALITY CHAPTER RECOMMENDATIONS AND POLICY OPTIONS

The Water Quality Chapter core recommendations and policy options relate to the two water quality goals: to restore and maintain the chemical, physical and biological integrity of the nation's water; and, to achieve and maintain water quality objectives that are necessary to protect all beneficial uses of all waters

11.05 Support regional efforts to identify and cooperatively plan for wetlands to facilitate both sustaining the amount and quality of wetlands in the region and expediting the process for obtaining wetlands permits.

SCAG staff comments. The Draft GMP/EIS in the Environmental Consequences Chapter identifies potential impacts related to wetlands for all alternatives. The Draft GMP/EIS includes mitigation measures that address impacts to wetlands. The Project is consistent with this core RCPG policy.

11.06 Clean up the contamination in the region's major groundwater aquifers since its water supply is critical to the long-term economic and environmental health of the region. The financing of such clean-ups should leverage state and federal resources and minimize significant impacts on the local economy.

SCAG staff comments. The Draft GMP/EIS includes mitigation measures that address the potential delivery of pathogens to groundwater and the potential for over extraction of groundwater for potable water uses. The Project is consistent with this core RCPG policy.

11.07 Encourage water reclamation throughout the region where it is cost-effective, feasible, and appropriate to reduce reliance on imported water and wastewater discharges. Current administrative impediments to increased use of wastewater should be addressed.

5.

<p><u>SCAG staff comments.</u> The Draft GMP/EIS does not address the subject of water reclamation. It would be helpful if the Final GMP/EIS would provide a discussion and address the manner in which the Project is supportive of or detracts from the achievement of this policy. Based on information provided in the Draft GMP/EIS, we are therefore unable to determine whether the Project is supportive of this ancillary RTP policy.</p>
--

5. With regard to core policy 11.07, this information, action or recommendation has been considered. Although water reclamation is not specifically addressed in the sections of the GMP dealing with water resources, the GMP is supportive of the broader goal of minimizing water consumption. While the park agencies support the principle of using reclaimed water wherever possible, they generally maintain landscapes that are entirely natural in order to minimize use of either potable or reclaimed water. Minor modifications ave been make to the GMP/EIS to reflect these principles.Your comments will be retained for use in future planning efforts



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OPEN SPACE CHAPTER ANCILLARY GOALS**Outdoor Recreation**

- 9.01 *Provide adequate land resources to meet the outdoor recreation needs of the present and future residents in the region and to promote tourism in the region.*

SCAG staff comments. The Draft GMP/EIS in the Summary, Purpose and Need, and The Park chapters, suggests that the proposed Project has adequate land resources to meet outdoor recreation needs. The Project is supportive of this ancillary RCPG goal.

- 9.02 *Increase the accessibility to open space lands for outdoor recreation.*

SCAG staff comments. See SCAG staff comments for Goal 9.01 The Project is supportive of this ancillary RCPG goal.

- 9.03 *Promote self-sustaining regional recreation resources and facilities.*

SCAG staff comments. See SCAG staff comments for Goal 9.01. The Project is supportive of this ancillary RCPG goal.

Public Health and Safety

- 9.04 *Maintain open space for adequate protection of lives and properties against natural and man-made hazards.*

SCAG staff comments. The Draft GMP/EIS in the Affected Environment and Environmental Consequences chapter the subject of protection of lives and properties against natural and man-made hazards. Mitigation measures recommended address identified impacts. The Project is supportive of this ancillary RCPG goal.

Resource Protection

- 9.08 *Develop well-managed viable ecosystems for known habitats of rare, threatened and endangered species, including wetlands.*

SCAG staff comments. See SCAG staff comments on Policy 3.20 The Draft GMP/EIS includes mitigation measures that support the creation of new habitat, if

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the existing habitat is impacted The Project is supportive of this ancillary policy.

CONCLUSIONS

1. As noted in the staff comments, the proposed Draft General Management Plan Environmental Impact Statement for the Santa Monica Mountains National Recreation Area supports many of the core and ancillary policies in the Regional Comprehensive Plan and Guide.
6.

Based on the information in the Draft GMP/EIS, we are unable to determine whether the Project is consistent with core policies 4.01, and 11.07. Based on the information in the Draft EIR, we are unable to determine whether the Project is supportive of ancillary policy 3.08.

2. As noted in the General Staff Comments, the Final GMP/EIS should address the relationships (consistency with core policies and support of ancillary policies) to SCAG's Regional Comprehensive Plan and Guide and discuss any inconsistencies between the proposed project and applicable regional plans.
3. All mitigation measures associated with the project should be monitored in accordance with CEQA requirements.

6. This is a summary comment. Policies 4.01, 3.08 and 11.01 are specifically addressed above.





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SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS

Roles and Authorities

THE SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS is a *Joint Powers Agency* established under California Government Code Section 6502 et seq. Under federal and state law, the Association is designated as a Council of Governments (COG), a Regional Transportation Planning Agency (RTPA), and a Metropolitan Planning Organization (MPO). Among its other mandated roles and responsibilities, the Association is

Designated by the federal government as the Region's *Metropolitan Planning Organization* and mandated to maintain a continuing, cooperative, and comprehensive transportation planning process resulting in a Regional Transportation Plan and a Regional Transportation Improvement Program pursuant to 23 U.S.C. '134(g)-(h), 49 U.S.C. '1607(f)-(g) et seq., 23 C.F.R. '450, and 49 C.F.R. '613. The Association is also the designated *Regional Transportation Planning Agency*, and as such is responsible for both preparation of the Regional Transportation Plan (RTP) and Regional Transportation Improvement Program (RTIP) under California Government Code Section 65080.

Responsible for developing the demographic projections and the integrated land use, housing, employment, and transportation programs, measures, and strategies portions of the *South Coast Air Quality Management Plan*, pursuant to California Health and Safety Code Section 40460(b)-(c). The Association is also designated under 42 U.S.C. '7504(a) as a *Co-Lead Agency* for air quality planning for the Central Coast and Southeast Desert Air Basin District.

Responsible under the Federal Clean Air Act for determining *Conformity* of Projects, Plans and Programs to the State Implementation Plan, pursuant to 42 U.S.C. '7506.

Responsible, pursuant to California Government Code Section 65089.2, for *reviewing all Congestion Management Plans (CMPs) for consistency with regional transportation plans* required by Section 65080 of the Government Code. The Association must also evaluate the consistency and compatibility of such programs within the region.

The authorized regional agency for *Inter-Governmental Review* of Programs proposed for federal financial assistance and direct development activities, pursuant to Presidential Executive Order 12,372 (replacing A-95 Review).

Responsible for reviewing, pursuant to Sections 15125(b) and 15206 of the CEQA Guidelines, *Environmental Impact Reports* of projects of regional significance for consistency with regional plans.

The authorized *Areawide Waste Treatment Management Planning Agency*, pursuant to 33 U.S.C. '1288(a)(2) (Section 208 of the Federal Water Pollution Control Act).

Responsible for preparation of the *Regional Housing Needs Assessment*, pursuant to California Government Code Section 65584(a).

Responsible (along with the San Diego Association of Governments and the Santa Barbara County/Cities Area Planning Council) for preparing the *Southern California Hazardous Waste Management Plan* pursuant to California Health and Safety Code Section 25135.3.

Revised January 18, 1995

COMMENTS

RESPONSES



COUNTY OF LOS ANGELES

FIRE DEPARTMENT
 1320 NORTH EASTERN AVENUE
 LOS ANGELES, CALIFORNIA 90063-3294
 (323) 890-4330

P MICHAEL FREEMAN
FIRE CHIEF
FORESTER & FIRE WARDEN

February 20, 2001

Arthur E. Eck, Superintendent
 Santa Monica Mountains National Recreational Area
 401 West Hillcrest Drive
 Thousand Oaks, CA 91360

Dear Mr Eck

SUBJECT: DRAFT GENERAL MANAGEMENT PLAN & ENVIRONMENTAL IMPACT STATEMENT FOR THE SANTA MONICA MOUNTAINS NATIONAL RECREATIONAL AREA – CALIFORNIA (EIR #1050/2001)

We have reviewed the Draft General Management Plan & Environmental Impact Statement for the Santa Monica Mountains National Recreational Area. The General Management Plan addresses the land located in the Santa Monica Mountains of Southern California. This draft has been reviewed by the Planning, Subdivision, and Forestry Divisions of the County of Los Angeles Fire Department. The following are their comments:

PLANNING:

1. The document makes an inaccurate assessment of the County of Los Angeles Fire Department's ability to absorb additional demand for service. Table IX states, "The no action alternative would have only negligible impacts on public services and utilities due to existing available capacity at local suppliers." Similarly, under Environmental Consequences, the discussion of fire protection impacts of each alternative states, "According to Los Angeles and Ventura Counties who provide fire protection and emergency response services, the development of new and modified park facilities could be served with no need for additional fire protection facilities or personnel." In reality, the County of Los Angeles Fire Department has inadequate capacity to serve existing and planned development in the area, and will need at least one new fire station. The preferred recreation, and education alternatives would all result in increased visitor population, vehicle traffic, and structures. They would therefore add to the already significant cumulative impact from proposed residential and commercial development.
2. To assess the impacts of the management plan, it would be helpful if the environmental document specifies the square footage of proposed new structures (e.g., visitor centers) and provides estimates of the increase in transient occupancy in the high intensity areas as compared to the present.

SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:

AGOURA HILLS	BRADBURY	CLAYHAY	HAWTHORNE	LA MIRADA	MANHATTAN	POMONA	SIGNAL HILL
ARTESIA	CALABASAS	DIAMOND BAR	HIDDEN HILLS	LARKSPRING	MAYWOOD	RANCHO PALOS VERDES	SOUTH EL MONTE
AZUSA	CARSON	DUARTE	HUNTINGTON PARK	LAKEWOOD	NORWALK	ROLLING HILLS	SOUTH GATE
BALDWIN PARK	CERRITOS	EL MONTE	INDUSTRY	LANCASTER	PALMDALE	ROLLING HILLS ESTATES	TEMPLE CITY

1. The inaccuracy of that statement as been corrected. The SMMNRA is currently rewriting its Fire Management Plan and is working with your agency, Ventura County and other land management agencies to gather the widest range of input to create a plan consistent with the fire management practices and capabilities of those groups.
2. This information, action, or recommendation has been considered. As appropriate, the anticipated increase in transient occupancy in high intensity areas contained in the FEIS has been modified in the environmental consequences Land Use and Socioeconomic Environment of all alternatives. However, the details of square footage are considered too site specific for this GMP/EIS, and will be addressed during project-specific implementation plans.

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GENERAL REQUIREMENTS:

Size, complexity, and projected use of the proposed development may necessitate multiple ingress/egress access for the circulation of traffic, and emergency response issues

The development of this project must comply with all applicable code and ordinance requirements for construction, access, water mains, fire flows and hydrants

This property is located within the area described by the Forester and Fire Warden as a Fire Zone 4, Very High Fire Hazard Severity Zone (VHFHSZ). All applicable fire code and ordinance requirements for construction, access, water mains, fire hydrants, fire flows, brush clearance and fuel modification plans, must be met.

Specific fire and life safety requirements for the construction phase will be addressed at the building fire plan check. There may be additional fire and life safety requirements during this time.

Every building constructed shall be accessible to Fire Department apparatus by way of access roadways with an all weather surface of not less than the prescribed width, unobstructed, clear-to-sky. The roadway shall be extended to within 150 feet of all portions of the exterior walls when measured by an unobstructed route around the exterior of the building.

When a bridge is required, to be used as part of a fire access road, it shall be constructed and maintained in accordance with nationally recognized standards, and designed for a live load sufficient to carry a minimum of 75,000 pounds

Fire sprinkler systems are required in some residential and most commercial occupancies. For those occupancies not requiring fire sprinkler systems, it is strongly suggested that fire sprinkler systems be installed. This will reduce potential fire and life losses. Systems are now technically and economically feasible for residential use.

INSTITUTIONAL, COMMERCIAL, OR INDUSTRIAL:

Development may require fire flows up to 5,000 gallons per minute at 20 pounds per square inch residual pressure for up to a five-hour duration.

Final fire flows will be based on the size of buildings, their relationship to other structures, property lines, and types of construction used.

Fire hydrant spacing shall be 300 feet and shall meet the following requirements

- 1 No portion of lot frontage shall be more than 200 feet via vehicular access from a public fire hydrant.
- 2 No portion of a building shall exceed 400 feet via vehicular access from a properly spaced public fire hydrant
- 3 When cul-de-sac depth exceeds 200 feet on a commercial street, hydrants shall be required at the corner and mid-block. Additional hydrants will be required if hydrant spacing exceeds specified distances

- 3. This information, action, or recommendation has been considered. This important planning component for the SMMNRA is too detailed or site-specific to be addressed in the GMP. The park agencies are mindful of the County's requirements and will continue to ensure that development projects comply with all codes and ordinances. Therefore, your comments will be retained to be used in future planning efforts. Management guidance for this component will be developed later, at a finer scale, in an implementation plan providing more detail than the GMP.
- 4. This information, action, or recommendation has been considered. This important planning component for the SMMNRA is too detailed or site-specific to be addressed in the GMP. The park agencies are mindful of the County's requirements and will continue to ensure that development projects comply with all codes and ordinances. Therefore, your comments will be retained to be used in future planning efforts. Management guidance for this component will be developed later, at a finer scale, in an implementation plan providing more detail than the GMP.

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- 4. A cul-de-sac shall not be more than 500 feet in length when serving land zoned institutional, industrial, or commercial use
- 5. A Fire Department approved turning area shall be provided at the end of a cul-de-sac

All proposals for traffic calming measures (speed humps/bumps, traffic circles, roundabouts, etc) shall be submitted to the Fire Department for review, prior to implementation

Turning radii shall not be less than 42 feet. This measurement shall be determined at the centerline of the road.

All on-site driveways shall provide a minimum unobstructed width of twenty-six (26) feet, clear-to-sky The on-site driveway is to be within 150 feet of all portions of the exterior walls of the first story of any building

Driveway width for commercial or industrial developments shall be increased when any of the following conditions will exist:

- 1 Provide twenty-eight (28) feet in width when a building has three or more stories, or is more than 35 feet in height, above access level Also, for using fire truck ladders, the centerline of the access roadway shall be located parallel to, and within 30 feet of the exterior wall on one side of the proposed structure
- 2 Provide thirty-four (34) feet in width when parallel parking is allowed on one side of the access roadway/driveway Preference is that such parking is not adjacent to the structure.
- 3 Provide forty-two (42) feet in width when parallel parking is allowed on each side of the access roadway/driveway
- 4 All "Fire Lanes" will be depicted on the final map, and will be designated with the appropriate signage "Fire Lanes" are any ingress/egress, roadway/driveway with paving less than thirty-four (34) feet in width, and will be clear-to-sky.

LIMITED ACCESS DEVICES (GATES, ETC.):

- 1. Any single gate used for ingress and egress shall be a minimum of twenty-six (26) feet in width, clear-to-sky.
- 2. Any gate used for a single direction of travel, used in conjunction with another gate, used for travel in the opposite direction, (split gates) shall have a minimum width of 20 feet each, clear-to-sky
- 3. Gates and/or control devices shall be positioned a minimum of 50 feet from a public right of way, and shall be provided with a turnaround having a minimum of 32 feet of turning radius If an intercom system is used, the 50 feet shall be measured from the right of way to the intercom control device
- 4. All limited access devices shall be of a type approved by the Fire Department
- 5. Gate plans shall be submitted to the Fire Department, prior to installation These plans shall show all locations, widths and details of the proposed gates

- 5. This information, action, or recommendation has been considered. This important planning component for the SMMNRA is too detailed or site-specific to be addressed in the GMP. The park agencies are mindful of the County's requirements and will continue to ensure that development projects comply with all codes and ordinances. Therefore, your comments will be retained to be used in future planning efforts. Management guidance for this component will be developed later, at a finer scale, in an implementation plan providing more detail than the GMP.





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Arthur E. Eck, Superintendent
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- 5. Specific fire and life safety requirements for the construction phase will be addressed at the building and fire safety plan check. There may be additional fire and life safety requirements during this time
- Should any questions arise regarding Subdivision, Water systems, or Access, please contact Inspector Michael McHargue at (323) 890-4243

OTHER ENVIRONMENTAL CONCERNS:

The statutory responsibilities of the County of Los Angeles Fire Department Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archeological and cultural resources and the County Oak Tree Ordinance.

The Santa Monica Mountains National Recreation Area encompasses thousands of acres within Los Angeles County that is located in a Very High Fire Hazard Severity Zone. We believe the plan does not adequately address hazardous fuels management for public safety. The General Plan document states that there are Private/Public Property ownerships that exist within, adjacent to, and surrounding the Santa Monica Mountains National Recreation Area. Our concern is that the General Plan will limit the effectiveness or omit County of Los Angeles Fire Department fire prevention methods regarding vegetation management, brush clearance, and fuel modification requirements.

- 6. A Fire Management Plan should be included in the EIR that addresses the wildland fire potential that exists in the Santa Monica Mountains National Recreation Area. A strategic vegetation plan identifying "dynamic fuel management zones for hazard reduction at the wildland-urban interface" mitigated by the utilization of prescribed burning or other appropriate methods, will help reduce the potential of catastrophic wildfire to the neighboring residents and communities.

If you have any additional questions, please contact this office at (323) 890-4330

Very truly yours,

DAVID R. LENINGER, ACTING CHIEF, FORESTRY DIVISION
PREVENTION BUREAU

DRL sc

- 6. Since the time these comments were received, the National Park Service, in cooperation with other park agencies in the Santa Monica Mountains, as well as the Los Angeles County and Ventura County Fire Departments, has begun the development of a revised Fire Management Plan that reflects these important concepts.

COMMENTS

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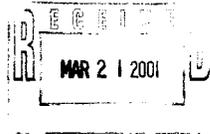
**COUNTY SANITATION DISTRICTS
OF LOS ANGELES COUNTY**

1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address P.O. Box 4998, Whittier, CA 90607-4998
Telephone (562) 699-7411, FAX: (562) 699-5422
www.lacsd.org

JAMES F. STAHL
Chief Engineer and General Manager

March 19, 2001
File 31R-106 10

Mr. Arthur E. Eck, Superintendent
Santa Monica Mountains National Recreation Area
National Park Service
General Management Plan Comments
401 W. Hillcrest Drive
Thousand Oaks, CA 91360



Dear Mr. Eck

Comments on Draft GMP/EIS for the Santa Monica Mountains National Recreation Area

Thank you for the opportunity to review and comment on the Draft General Management Plan (GMP) and Environmental Impact Statement (EIS) for the Santa Monica Mountains National Recreation Area (SMMNRA). The Sanitation Districts have the following comments regarding the document:

1.
 - On page 209 of the GMP and EIS, in the Waste Management section, it states that solid waste management services are provided to the SMMNRA by the Calabasas Landfill. The Calabasas Landfill is a solid waste disposal facility open to the public. The landfill only accepts refuse originating within an identified area, referred to as a watershed, which includes a majority of the SMMNRA. The landfill's watershed is shown on the attached map. Note that there are also other solid waste facilities in the region that are able to provide solid waste management services to the SMMNRA. Therefore, the Sanitation Districts request that the statement on page 209 is reworded to state that the Calabasas Landfill is able to provide solid waste management services to most of the SMMNRA.
 - On page 210, the Calabasas Landfill is indicated as currently accepting 2,500 tons of refuse per day. While a few years ago the landfill was receiving this amount, since then, its disposal rate has changed and it currently averages 1,200 tons per day. Although the landfill is permitted to accept 3,500 tons per day, the Sanitation Districts do not have any control over the amount of incoming waste. The tonnage rate varies according to influencing factors such as market conditions.
 - On pages 297, 364, and 396, in the Waste Management section, Los Angeles County is referred to as the operator of the Calabasas Landfill. Actually, Los Angeles County owns the landfill and the Sanitation Districts are the operator. We request that Los Angeles County is identified as the owner of the landfill instead of the operator.

1. This information, action, or recommendation has been considered. The GMP/DEIS text has been changed as follows: changes on pages 209, 210, 297, 364, and 396.

*Consultation and Coordination
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**COMMENTS****RESPONSES**

Mr Arthur E Eck

-2-

March 19, 2001

2. • On page 418, in the Appendix describing Specific Development Projects, it states that the Calabasas Landfill is estimated to reach its permitted capacity in 2018. The capacity of the Calabasas Landfill is not time based but rather volume based. Once the identified volume has been filled, the landfill will close. The actual closure date, then, is dependent upon the incoming tonnage rate. As noted above, the Sanitation Districts do not have any control over the amount of incoming waste. Thus, while the closure date can be estimated based on current tonnage rates, those rates and the associated estimated closure date are subject to change. Therefore, the Sanitation Districts request that the estimated year of closure, indicated as 2018 on page 418, be removed.
3. • In the Appendix of Tables, on page 429, under the Other Environmental Planning Documents category, it lists 1997 as the date of the Calabasas Landfill Special Use Permit Environmental Assessment. This document is actually dated September 1998.

Thank you again for the opportunity to review and comment on the Draft GMP and EIS for the Santa Monica Mountains National Recreation Area. Please call Rupam Soni at (562)699-7411, extension 2466, if you have any questions concerning these comments.

Very truly yours,

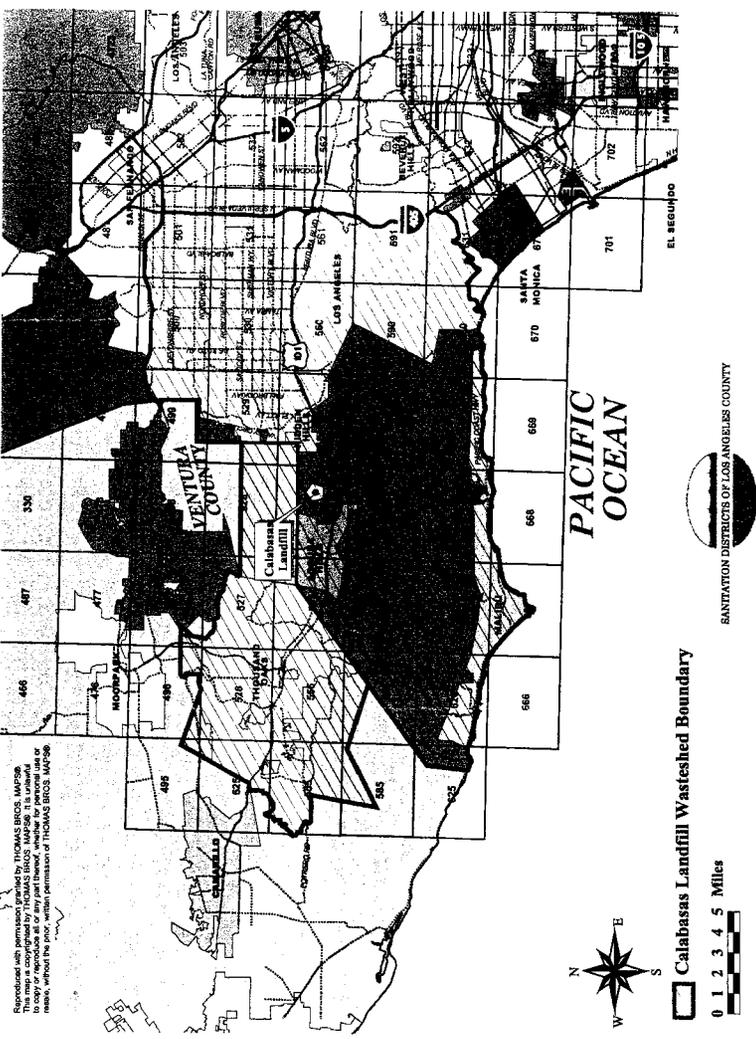
James F Stahl

Grace R. Chan
 Planning and Permitting Section Head
 Solid Waste Management Department

GRC RS ksc
 Enclosure

2. This information, action, or recommendation has been considered. The GMP/DEIS text has been changed as follows: changes on pages 418 and 429.
3. This information, action, or recommendation has been considered. The GMP/DEIS text has been changed as follows: changes on pages 418 and 429.

Calabasas Landfill Wasteshed Map



COMMENTS

RESPONSES



COMMENTS

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1 GENE TALMADGE: My name is Gene Talmadge,
 2 T-a-l-m-a-d-g-e. I represent the Las Virgenes Municipal
 3 Water District. My comments are very brief tonight. But
 4 I'll first off thank you guys for the opportunity to
 5 review the plan.

6 Not as my closing remark, but as a water color
 7 artist, I was absolutely fascinated with the color. I
 8 don't know who did that painting, and there ought to be
 9 some credit for it. That's really a cool painting.

1. 10 Two items, just for clarification. One, when
 11 the plan addresses boundary study areas, one of them I
 12 have defined as Las Virgenes Reservoir. That's not
 13 right. And I want to be sure that the boundary study
 14 area addresses specifically the preservation of water
 15 quality of life when looking at adjacent land uses.

2. 16 Second, under the environmental consequences
 17 under public services and utilities, water and
 18 wastewater, specifically, there is general reference in
 19 all of the sections about minimal impact to water and
 20 wastewater services. While that statement is true, the
 21 implication is that Las Virgenes is to provide service to
 22 the entire study area. That's not the case. Our service
 23 area is much more restricted than the proposed study
 24 addresses. There are many other agencies. So just a
 25 point of clarification.

1. This information, action, or recommendation has been considered. The description of the affected environment contained in the DEIS has been modified.
2. This information, action, or recommendation has been considered. The analysis of environmental consequences contained in the DEIS has been modified in the Public Services and Utilities sections for all alternatives.

Comment period - Mon, 2/5/2001
 Agoura Hills/Calabasas Community Center

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3.

1 Specifically in sewer, we only cover the area
2 that is tributary to Malibu Creek. That is which we call
3 the south slope that drains naturally into the ocean is
4 something else entirely. So thank you very much.
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3. This information, action, or recommendation has been considered.
The analysis of environmental consequences contained in the DEIS
has been modified in the Public Services and Utilities sections for all
alternatives.



COMMENTS

RESPONSES



MARGO MURMAN
Executive Officer

RESOURCE CONSERVATION DISTRICT
OF THE
SANTA MONICA MOUNTAINS

122 NORTH TOPANGA CANYON BOULEVARD TOPANGA, CALIFORNIA 90290
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E-mail: rcdsmm@earthlink.net

BOARD OF DIRECTORS
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President
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DENNIS WASHBURN
Treasurer
DAVID GOTTLIEB
FRAN PAVLEY

27 February 2001

Arthur Eck
Santa Monica Mountains National Recreation Area
401 W. Hillcrest Drive
Thousand Oaks, CA 91360

**Re: Comments on the Draft General Management/Environmental Impact Statement
for the Santa Monica Mountains NRA**

Dear Arthur Eck,

We appreciated the opportunity to review the Draft General Management/Environmental Impact Statement for the Santa Monica Mountains NRA, but found that a few questions remain unanswered.

1.

First, we wondered why lower Topanga Canyon Blvd. and Topanga Beach were not included within the boundary of the SMMNRA. Given that there is a proposed visitor center in Santa Monica and that the intersection of Topanga Canyon Blvd. and PCH is a major access point for visitors to the NRA, it would seem reasonable to incorporate this area as well. We would also like to suggest that since this property is under option for purchase as parkland, that consideration be given to utilizing some of the historic buildings at that location for a visitor center, as well as for expanded recreation and wetland/lagoon restoration possibilities.
2.

Second, we are concerned that Topanga Canyon Blvd. is only recognized as a scenic highway in the Education and Recreation Alternatives. Why is it excluded in the Preservation or Preferred Alternatives presented? The majority of the route from PCH to the Top of Topanga obviously meets the criteria for inclusion and recognition of its scenic value.

1. This information, action, or recommendation has been considered. Lower Topanga Canyon Boulevard and Topanga Beach are in fact already within park boundaries. As to the particular possibilities with respect to developing facilities at the southern entry to Topanga Canyon, this important planning component for the SMMNRA is too detailed or site-specific to be addressed in the GMP. However, your comments will be retained to be used in future planning efforts. Management guidance for this component will be developed later, at a finer scale, in an implementation plan providing more detail than the GMP.
2. This statement or opinion has been considered. No change has been made to the GMP/EIS. The NPS welcomes the continuing involvement of the public in the management of the SMMNRA and appreciates the thoughtful and committed input received on the GMP/EIS.

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3. Third, given the historic and current presence of steelhead trout in Topanga Creek, we were surprised that the entire document fails to discuss restoration possibilities for the historic wetlands/lagoon at the mouth of Topanga Creek or within the creek corridor. The summary on page 131 should have recognized the contribution of Topanga to the regional habitat potential for this species. Additionally, now that most of the Trancas Watershed is managed by NPS and has continual stream flow, the potential for steelhead introduction at that location should also be explored. We hope that both of these potentially valuable habitats are included and their contributions noted in subsequent documents.

4. Fourth, we support the analysis presented in the document concerning the impacts of brush clearance and prescribed burning on the fire frequencies, and subsequent vegetation responses. A more coordinated plan for fire safety that more thoroughly incorporates environmental considerations is clearly needed. The SMMNRA could provide valuable leadership for developing a more considered approach to ecologically sensitive vegetation management for fire safety in the wildland interface zone.

5. Fifth, we would like to suggest that preserving the unique vegetation assemblages within the SMMNRA is critical to its long term sustainability and value. The value should not only include ecological considerations, but also the calculated contributions of the native vegetation to reducing stormwater runoff and erosion, moderating temperatures, filtering air pollutants and sequestering carbon. A study by American Forests found that each individual mature tree contributes approximately \$275 worth of avoided infrastructure and maintenance costs. The extent and diversity of the vegetative community in the Santa Monica Mountains therefore becomes extremely valuable to the citizens by precluding the need for extensive investment in man made solutions to these problems. Incorporating the economic benefits provided by preserving the Santa Monica Mountains clearly strengthens the goals of preservation

6. Finally, it appears that the only substantive difference between the alternatives is percentage of land designated for low intensity use. Each of the alternatives offers just a slightly different suite of opportunities, all of which are really important if the NRA is to fulfill its mission of preservation, education and recreation. Therefore, we would like to suggest that a composite alternative including the complimentary elements of all the proposed alternatives, coupled with the high percentage of low intensity use proposed by the preservation alternative, be considered as well.

Clearly a great deal of thought went into the preparation of this document. It is an impressive summary of why the Santa Monica Mountains NRA is such an important component of the national heritage, with both local and national significance. We appreciate the combined efforts of all the park agencies to identify and assess the resources and constraints within the mountains. Given the tremendous pressures on the Park from development, interface conflicts, infrastructure limitations, and natural hazards, the choice to err on the side of preservation rather than use seems warranted.

3. This information, action, or recommendation has been considered. In fact, the draft GMP/EIS asserts the objective to restore estuaries and wetlands in the actions common to all alternatives (page 48) and describes both Topanga Creek and Trancas Watershed on pages 152 and 156, respectively. However, the description of the affected environment contained in the DEIS has been modified (page 131).

These comments are consistent with the mission goals and Preferred Alternative of the Draft General Management Plan, minor corrections have been made.

4. This information, action, or recommendation has been considered. This important planning component for the SMMNRA is too detailed or site-specific to be addressed in the GMP. Since the time these comments were received, the National Park Service, in cooperation with other park agencies in the Santa Monica Mountains, as well as the Los Angeles County and Ventura County Fire Departments, has begun the development of a revised Fire Management Plan that reflects these important concepts.

5. This information, action, or recommendation has been considered. The National Park Service agrees that these are valuable considerations to society. Precise calculations of the value of "ecological services" are not easily calculated and, for the purposes of this document, are simply acknowledged to exist.

6. This information, action, or recommendation has been considered. No change has been made to the GMP/EIS. After internal NPS and community scoping, the NPS developed the Preferred Alternative as an integrated alternative that reflects a composite approach.





COMMENTS

RESPONSES

Thank you for the opportunity to comment on this tremendously important effort.

Sincerely,

Rosi Dagit
Senior Conservation Biologist

COMMENTS

RESPONSES



**Santa Monica Mountains
National Recreation Area**

Draft General Management Plan & Environmental Impact Statement

Name: BARBARA DOHRMANN
Mailing Address: 16437 SLOAN DRIVE
LOS ANGELES, CA 90049
Affiliation: BEL AIR SKYCREST PROPERTY OWNERS ASSN

COMMENTS: (continue on back if needed)

Our Association is primarily concerned about the trailhead development of Mission Canyon and what that would specifically entail. We are located directly north of - and adjacent to, the portions of Mission Canyon which were filled by the County Sanitation District during the early 1960's - "Canyons #1, 2 & 3". Those areas are currently maintained and serviced by the County Sanitation District #2 and it is our understanding that they will remain responsible for such maintenance as long as the "landfilled" areas continue to decompose, generate methane gas and change in configuration, etc.

We note that you would develop Mission Canyon for parking, toilets and interpretive facilities, and wish to encourage you to secure the previously filled areas from

Please check here and fill in your name and address above if you would like to be removed me from our mailing list.

- 1. This information, action, or recommendation has been considered. No change has been made to the GMP/EIS.



COMMENTS

RESPONSES

1. *public access' for the general public safety, and the ongoing need of our community, to have the County Sanitation District continue to maintain the filled areas for which they should also continue to be liable in the event of presently unforeseen problems. At present, "County San" does not permit public access to the property but many people do, nevertheless, enter and roam about on these open fields - some bring their dogs and children - and most strangers to the area seem unaware of the history of the landfill. We hope that trailhead development of the main canyon would not increase or in any manner encourage such public access to the landfill areas - or the flare stations nearby. Our community is generally supportive of the SMMNRA and your preferred alternative. We hope to work for and with you to accomplish your proposals - with the aforesaid proviso in mind - and sincerely hope the County Sanitation District will cooperate with you as well.*

2. *You might be well advised to add County Sanitation District #2 to your mailing list, if you haven't already done so, and to invite their comments regarding their intentions for future maintenance.*

Our Association intends to submit formal written comments prior to your Feb. 28, 2001 deadline.

2. This information, action, or recommendation has been considered. No change has been made to the GMP/EIS.

COMMENTS

RESPONSES

1 system. Thanks.

2 EILEEN ANDERSON: I'm Eileen Anderson,
3 A-n-d-e-r-s-o-n, and I'm here representing the
4 California Native Plant Society, and I would like to
5 thank all of the people that were involved with the
6 production of this beautiful, readable,
7 understandable document, so thank you very much. I
8 thought the maps were great.

9 The Native Plant Society's mission is to
10 protect native plants in their natural environment,
11 and so with that mission in mind -- we do that
12 through education, and with that mission in mind, we
13 would be more likely to support the preservation
14 alternative in the document now because of the less
15 disturbance involved with that and more conservation.

16 However, I have a couple of comments at this
17 time about the preferred alternative, and I'll be
18 submitting comments also in writing, but as of
19 tonight so far that I have gotten through the

1. 20 document, I would like to encourage you to use native
21 plants in landscaping around your structures.

22 I see two benefits to that. One, it's an
23 excellent educational opportunity to show people how
24 native plants can be very effective in landscaping as
25 well as it's a great educational opportunity to

1. This information, action, or recommendation has been considered. This important planning component for the SMMNRA is too detailed or site-specific to be addressed in the GMP. It is however consistent with the management policies followed by the National Park Service. Therefore, your comments will be retained to be used in future planning efforts. Management guidance for this component will be developed later, at a finer scale, in an implementation plan providing more detail than the GMP.



COMMENTS

RESPONSES

1 actually let people know what plants they're seeing
 2 out there.

2. 3 Our other concern is we'd like to see a much
 4 stronger commitment to weed control in the preferred
 5 alternative. We see invasive exotic species as being
 6 one of the number one threats to the unique
 7 vegetation in California, not just in the recreation
 8 area but other places also, and so -- specifically
 9 even in the low intensity areas we're really
 10 concerned about weed introductions, and usually those
 11 occur along trails or roads or whatever, areas where
 12 people travel.

13 And whether it be for hiking, biking,
 14 equestrian or vehicular use for that matter, what
 15 we'd like to see is some recommendations for --

3. 16 besides for education, for cleaning equipment prior
 17 to going into those areas so that weeds aren't spread
 18 into those areas as well as I know other federal
 19 agencies have required weed-free feed for stock prior
 20 to the stock going out onto the trails so they don't
 21 leave those nice little packets of weed seeds that
 22 can spread into the natural areas.

23 So I think for tonight those are going to be
 24 my comments, and I look forward to submitting others
 25 in writing. Thank you.

2. This information, action, or recommendation has been considered. This important planning component for the SMMNRA is too detailed or site-specific to be addressed in the GMP, beyond the discussion found on pages 38-39. However, your comments will be retained to be used in future planning efforts. Management guidance for this component will be developed later, at a finer scale, in a more detailed plan than the GMP (i.e., comprehensive alien plant management plan).

This information, action, or recommendation has been considered. This important planning component for the SMMNRA is too detailed or site-specific to be addressed in the GMP. However, your comments will be retained to be used in future planning efforts. Management guidance for this component will be developed later, at a finer scale, in an implementation plan providing more detail than the GMP (i.e., Weed Management Plan). Management guidance for this component will be developed later, at a finer scale, in a more detailed Invasive Weed Management Plan shortly going into preparation).

3. This information, action, or recommendation has been considered. This important planning component for the SMMNRA is too detailed or site-specific to be addressed in the GMP. However, your comments will be retained to be used in future planning efforts. Management guidance for this component will be developed later, at a finer scale, in an implementation plan providing more detail than the GMP. Management guidance for this component will be developed later, at a finer scale, in a more detailed Invasive Weed Management Plan.

COMMENTS

RESPONSES



5/17/01

INPUT TO DRAFT MANAGEMENT PLAN AND EIS
Santa Monica Mountains National Recreation Area
"For the highest and best use of the Resources"

Arthur Eck, Superintendent SMMNRA
401 W. Hillcrest Dr.
Thousand Oaks, Calif. 91320

Dear Superintendent Eck,

Thank you for hearing our comments on this most important issue. We have been fifteen years in the saddle, battling Soka, with our only care those unborn generations who might never experience the wonders of a sparkling creek, a brilliant, silent night: the mysterious migrations of flora and fauna which wind their ways on ancient paths through the Santa Monica Mountains.

1. We support the preservation Alternative as delineated in Table 48 of the Draft Management Plan. We wish to emphasize the protection of watersheds and plant and animal corridors.

re: so-called multi use trails, we very much oppose the use of mechanized vehicles (bicycles) on parklands, and ask that horses be prohibited from sensitive areas. No one has the right to inflict his particular form of recreation upon the Park in such a way that it becomes a non-renewable resource. There will always be more mechanically oriented individuals than simple hikers, since we're all products of the city now and all of us imprinted with skates, bikes, go carts, etc. It is only common sense. So you in the Parks Department must be courageous and hold the line. Otherwise, years hence, your Brave New world will have only trails, surrounded by dead space, and on those trails two way traffic of now unimagined vehicles ("people powered" of course), bearing to and fro, and the odd hiker, washed in between, pushing his or her way through, to curses of irate mechanists, "What nerve, get out of the way, slow poke!"

The main cause of Coalition to Preserve Las Virgenes is the purchase and inclusion of Gillette Ranch as Joint Administration and Educational Center of the SMMNRA. You may count on us to lead the grass roots effort in support of this end.

Sincerely,

Joan E. Kay, Sec., CHLV

1. This statement or opinion has been considered. No change has been made to the GMP/EIS. The NPS welcomes the continuing involvement of the public in the management of the SMMNRA and appreciates the thoughtful and committed input received on the GMP/EIS.

COMMENTS

RESPONSES

Kim Benz To: Adrienne A Anderson/DENVER/NPS
05/31/2001 01:11 PM cc:
MDT Subject: Fwd:CORBA & IMBA Comments on GMP

cc:Mail Forwarding Information

Forward Header

Subject: COREBA & IMBA Comments on GMP
Author: IMBAJim@aol.com
Date: 05/31/2001 12:18 PM

To: Art Eck, Superintendent
SMMNRA

From: The Concerned Off-Road Bicyclists Association
The International Mountain Bicycling Association

Jim Hasenauer
4359 Pampas Road
Woodland Hills, CA 91364

talk: 818-704-7396
fax: 818-704-4827
email: imbajim@aol.com

May 31, 2001

Comments on Draft General Management Plan

CORBA represents the interests of mountain bicyclists in the Santa Monica Mountains and Rim of the Valley Corridor. CORBA members are mostly individual riders. IMBA is an international umbrella organization representing responsible mountain bicycling. IMBA members are individuals, clubs and business entities. Neither CORBA nor IMBA are industry associations Both CORBA and IMBA are 501(c)3, non-profit, educational, membership organizations dedicated to responsible, sustainable mountain bicycle recreation.

We applaud the hard work that went into the development of the GMP and we're particularly pleased that comments we made earlier in the process have been incorporated into this draft.

- 1. We endorse the Preferred Alternative with its vision of keeping 80% of the SMMNRA "low intensity". We want to keep the Santa Monica Mountains wild and natural, a healthy habitat for native flora and fauna. With the exception of the beaches, campgrounds, certain educational/entertainment facilities like Peter Strauss and Paramount Ranches, we think the best and most appropriate visitor recreational use of the mountain parks is low impact, dispersed backcountry trail recreation like mountain bicycling, hiking and horseback riding.

We think the highest priority for park management should be development monitoring and land acquisition. We are extremely concerned about commercial and residential real-estate development within and adjacent to the NRA and to changing uses (e.g., wine production) that might seriously impact the NRA.

- 2. We appreciate that mountain bicyclists are included in the plan as part of the mix in low intensity recreation (p. 49). That is exactly how we see

- 1. This statement or opinion has been considered. No change has been made to the GMP/EIS. The NPS welcomes the continuing involvement of the public in the management of the SMMNRA and appreciates the thoughtful and committed input received on the GMP/EIS.
2. This statement or opinion has been considered. No change has been made to the GMP/EIS. The NPS welcomes the continuing involvement of the public in the management of the SMMNRA and appreciates the thoughtful and committed input received on the GMP/EIS.

COMMENTS

RESPONSES

- ourselves and that is a recognition of current practices in the Santa Monicas. We understand that one of the first new planning actions to follow the GMP will be a new Trail Plan. We welcome this and are committed to assist in every way possible. At the same time, having been involved in unnecessarily contentious trail planning processes in the past, we are concerned. We appreciate that the GMP rejects the "ban bicycles" view offered in some early comments (p. 94). A strong statement in the GMP that
3. responsible mountain biking is a legitimate use and that most SMMNRA trails should be open to responsible mountain bike use, would certainly provide direction and vision for further planning.
4. We share the goal of completing the Backbone Trail (p. 41). Bicyclists, like hikers and equestrians share the dream of a great long trail through the mountains. In an earlier draft of the GMP, in "the integrated vision" there was a specific reference to a "bikes OK" re-route of the Backbone Trail skirting the Boney Mountain Wilderness. This was not in the draft GMP. We need that trail and would like to see it included in the final draft. Similarly, there are other sections of the Backbone Trail that are currently closed to bicyclists. These are missing links to us and significantly affect our recreational choices. While these are mostly on state land, (e.g., in Topanga State Park, and the Hondo Canyon and Stunt- Piuma sections) they are significant to mountain bicyclists and the intention of providing bike access should be in the GMP. The Backbone should be the great shared use recreational trail in the mountains.
- Similarly, we want to see the DeAnza trail completed through the Simi Hills and we expect that this trail will be shared use.
5. The draft plan mentions that "user conflict" detracts from visitor experience (p. 38) We think that statement requires further scrutiny and we urge the park to separate real problems from perceived problems. First, available evidence indicates that there is not a lot of user conflict in the mountains and that most visitors are quite happy with their experience; second, where there is user conflict, its significance may be exaggerated by the multiple, continuous complaints of relatively small number of people. Third, we need to be very careful in unnecessarily restricting a legitimate user group to satisfy what may be the prejudiced demands of another. The quality of cyclists' visitor experience should not be sacrificed to meet the needs of anti-bicyclists' experience. In fact, some things just aren't controllable. Research on user conflict has suggested that the very sight of a bicycle rack on a parked car in a parking lot might ruin someone's day. That's them, not the cyclists, not the park. Perhaps the "conflict-free environment" envisioned on p. 41, is beyond our grasp. How would you pacify the unreasonable demand from those that wanted to ban all bicycles from all park trails (p. 94)? Education, cooperation and communication are key here. Bringing people together will work better than trying to keep people apart.
6. In an earlier draft of the GMP, the "recreation vision" offered that all trails should be multiple-use. We believe instead that most trails should be multiple use. In the SMMART process, I submitted a BIKES BELONG/SHARE THE TRAILS vision for the trails of the Santa Monica Mountains. Since then, that paper has been re-written and distributed nationally as a SHARED USE COMMUNITY TRAIL SYSTEMS vision. It recognized that not all trails should be shared use, but points to the benefits of generally shared use trails. Shared use trails build community. They are easier to maintain, sign and regulate. They maximize recreational trail distance and minimize costs and environmental impact. CORBA and IMBA stand by this vision.
7. The GMP says that the park will maintain trails in moderate and high intensity zones with motorized equipment (p. 49). It should also be acceptable to use motorized equipment on trails in non-Wilderness low

3. This comment is generally consistent with the preferred alternative proposed in this GMP/EIS. The GMP does recognize mountain biking as a legitimate use; see page 94.
4. The bicycle reroute for the Backbone Trail around the Boney Mountain Wilderness was inadvertently omitted from the draft GMP and now appears in the text of the final version. Otherwise, these remarks speak to concerns more detailed than the scope of the General Management Plan. They will be used in the formulation of a Draft Trail Management Plan, expected for release sometime in late 2002 or early 2003.
5. This statement or opinion has been considered. No change has been made to the GMP/EIS. The NPS welcomes the continuing involvement of the public in the management of the SMMNRA and appreciates the thoughtful and committed input received on the GMP/EIS.
6. This information, action, or recommendation has been considered. No change has been made to the GMP/EIS. The NPS welcomes the continuing involvement of the public in the management of the SMMNRA and appreciates the thoughtful and committed input received on the GMP/EIS.
7. This information, action, or recommendation has been considered. They will be used in the formulation of a Draft Trail Management Plan, expected for release sometime in late 2002 or early 2003.



COMMENTS

RESPONSES

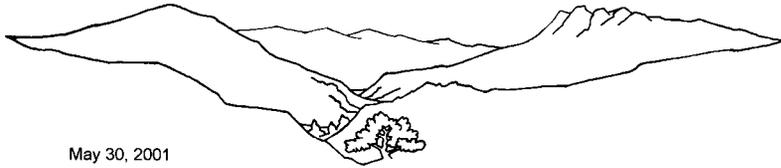
7. intensity zones.. SWECOS and similar machines offer an economical, efficient way to build sustainable, enjoyable, safe, shared use trails. We shouldn't eliminate the option.
8. The GMP calls for a study of possible Wilderness designation north and west of Circle X. .Since much of this land is remote and already protected by park and/or California Wilderness designation, we're not convinced that a new Wilderness designation is desirable. Wilderness requires a higher level of monitoring and management than may be necessary to protect its wildness. This designation could have serious impact on fire management. Since bikes are banned from Wilderness, we're also concerned that it might affect bike access and connectivity. Don't get us wrong. We want to keep that and other sections of the Santa Monicas as wild as possible. We just may not need the Wilderness designation to do it.
9. There is one comment in the GMP, that we found to be extremely troubling. We hope it is a vestige of some rejected earlier draft. On p. 251, in the consideration of the environmental consequences of the "no-action" alternative, there is the claim that "mountain bike riding could be moderately to highly destructive to cultural resources through the acceleration of erosion. " Importantly, this comment did not find it's way into the environmental consequences of the "preferred alternative", nor should it. This claim is unsupported. Mountain bike use on trails does necessarily accelerate erosion. All trails show wear from trail use, but well designed and maintained trails are completely manageable. As a practice, trails are routed away from cultural resources. We reject the claim. Research shows that bike impacts are not significantly different than hiker impacts and are less than horse impacts in most cases.
- CORBA and IMBA pledge to continue to work positively with the SMMNRA and the various agencies to make the park a wild and wonderful place. We appreciate your serious consideration to these comments. We would be happy to elaborate if that is useful to you.

8. This information, action, or recommendation has been considered. This important planning component for the SMMNRA will be addressed at such time as a wilderness inventory is undertaken.
9. This statement or opinion has been considered. No change has been made to the GMP/EIS. The NPS welcomes the continuing involvement of the public in the management of the SMMNRA and appreciates the thoughtful and committed input received on the GMP/EIS. As noted in the discussion on "carrying capacity" (beginning on page 173), the park has not noted damage to any cultural sites because of mountain biking. The principal strategy used to avoid this problem is through advanced archeological surveys and the re-routing of trail construction when significant resources are discovered. That is not to say that the potential for damage does not exist, but mitigation can be used to avoid many of the problems.

COMMENTS

RESPONSES

CONEJO OPEN SPACE CONSERVATION AGENCY



May 30, 2001

Arthur Eck, Superintendent
Santa Monica Mountains
National Recreation Area
National Park Service
401 Hillcrest Drive
Thousand Oaks, CA 91360

Dear Superintendent Eck,

Thank you for the opportunity to comment on the Draft Santa Monica Mountains National Recreation Area General Management Plan and Environmental Impact Statement. Following are comments from COSCA Staff regarding errors or omissions identified in the draft document.

1.
 1. On page 18, it is stated that 63,000 acres of the SMMNRA is now parkland, yet on page 19 it states that 69,099 acres of the SMMNRA is now parkland. Please clarify.
 2. On page 18, Table 1 identifies 96 acres of COSCA land as being within the SMMNRA. Please clarify where these are located, as most COSCA lands appear to be outside the SMMNRA boundary.
2.
 3. On page 21/Figure 3, please correct spelling as follows: Potrero Open Space, Rancho Conejo Open Space, and Joel McCrea Wildlife Refuge. "Conejo Peak" appears to be incorrectly located- there is a Conejo Mountain (elevation 1,820') that is on the south side of the 101 Freeway immediately west of the Thousand Oaks city limit.
 4. On page 129/Figure 10, "Potrero Valley Creek" should be changed to the "South Branch of the Arroyo Conejo".
 5. On page 3, the total area within the SMMNRA is stated at over 150,00 acres, and on page 179 the total area is noted at approximately 130,000 acres. Please clarify.

1. This information, action, or recommendation has been considered. The GMP/DEIS text has been changed as follows: If appropriate, changes to text on pages cited in the comment have been made.
2. All this information has been considered and incorporated into the GMP/EIS text and graphics where appropriate. Some map changes will be done on the NRA's geographic information system as the scale of the maps in this document cannot portray the information accurately.





COMMENTS

RESPONSES

2.

- 6. On page 181/Figure 13, the northeast portion of the Thousand Oaks city boundary should be expanded to reflect the recent annexation of the Woodridge property (Tract 5040).
- 7. On page 182/Figure 14, the "existing park land" in Thousand Oaks is not entirely shown. Please contact staff regarding additional park lands including Hill Canyon, the Woodridge Open Space, the Conejo Ridge Open Space, and recent additions to the North Ranch Open Space.
- 8. On page 194, the current natural open space in Thousand Oaks is 14,449 acres, which is 37% of the land within the City's Planning Area. This acreage excludes parks and golf courses. The total acreage for natural open space, golf courses and parks is expected to be approximately 41% of the Planning Area.

In conclusion, we recognize that this draft document provides a conceptual framework for land use planning and resource management within the SMMNRA. Staff looks forward to continued cooperation between the National Park Service and the Conejo Open Space Conservation Agency to apply these principles to specific projects located within our respective jurisdictions.

Sincerely,



Mark Towne
COSCA Coordinator

CDD:531-10/mt/cdmtowne/NPS22

COMMENTS

RESPONSES

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COLLEEN HOLMES: Hi. My name is Colleen Holmes,
H-o-l-m-e-s, and I am -- I live over by the Paramount
Ranch area, and I represent an organization by the name
of Cornell Preservation Organization.
I am very fortunate and grateful to be able to

Comment period - Mon, 2/5/2001
Agoura Hills/Calabasas Community Center



COMMENTS

RESPONSES

1 be here this evening. I have a friend that just called
2 me at the last minute and notified me of this meeting.
3 And I -- so I don't have my notes completely together.
4 But I would like to put on record that -- that I'm very
5 happy to see in the preservation alternatives that
6 there's a piece of land we're particularly interested in,
7 that is -- the subject property is referred to as the
8 Vance Moran property, that we put a lot of time into when
9 they were up there and it's being developed.

10 This particular piece of property, from the
11 Santa Monica Mountains National Recreation Area's point
12 of view, calls it the Paramount Ranch Film & History
13 Center, potentially designated as such. And I want to
14 take a minute to tell you that this particular piece of
15 property is extremely significant.

16 Not only does it have half of the property under
17 a significant ecological area number 6, but it's also the
18 gateway to the Santa Monica Mountains from Agoura Hills.

19 It's approximately 320 acres. It's under a very
20 prominent land feature designated in the north area of
21 the land as Ladyface Mountain. And on this particular
22 piece of property, a watershed here is one of the major
23 values to the property.

24 There's four major subdrains. Medea Creek,
25 Lindero, Palo Comado, and Cheseboro Canyon all drain onto

COMMENTS

RESPONSES

1 this particular piece of property. And there's several
2 blue line streams as well.

3 Not only is it the SEA number 6, what that means
4 is it does have endangered flora and fauna on the
5 property. Without going into a lot of detail, there's
6 some very significant wildlife and flora on the property.
7 It also has wildlife corridors and linkages on the
8 property, and it's just in a very, very significant area
9 in the Santa Monica Mountains.

10 One day I envision a visitor center, showing
11 Paramount Ranch's film history, with hiking, biking, and
12 riding trails leading from this visitor center to give
13 the visitor a memorable journey to Paramount Ranch.

14 There's many bicyclists and horseback riders
15 that like to go on this particular area along Cornell
16 Road, and my feeling is it's a wonderful way to acquaint
17 visitors to the Santa Monica Mountains by this one

1. 18 particular piece of property since Ladyface Mountain
19 flanks it on one side. And to me it just seems so right
20 for it to be acquired in some way. And I know the
21 Cornell Preservation Organization is certainly working
22 towards accomplishing that in some way. Thank you.

1. This statement or opinion has been considered. No change has been made to the GMP/EIS. The NPS welcomes the continuing involvement of the public in the management of the SMMNRA and appreciates the thoughtful and committed input received on the GMP/EIS.



COMMENTS

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NANCY PEARLMAN: Good evening. My name is Nancy Pearlman; N-a-n-c-y, P-e-a-r-l-m-a-n. I'm speaking both for myself and also representing the Ecology Center of Southern California, a regional conservation organization that was active when it founded in 1972 in trying to create a Santa Monica Mountain's National Recreation Area. Before that, I even helped organize a march to create a national park in the Santa Monica Mountains with many of the other environmental organizations in the

COMMENTS

RESPONSES

1 area. So we have over a 30-year history of trying to
2 preserve and protect the open spaces in the Santa Monica
3 Mountains.

4 In addition to that, I created the first nature
5 national documentary on the Santa Monica Mountains, "Gem
6 in the Heart of the City," which I hope all of you have
7 seen. And I've created an Emmy-nominated special in
8 1986, the first special about that wonderful area that we
9 have in our backyard, a gem, truly, in the heart of our
10 city. And that's why we're very concerned about the
11 continued preservation of this area.

12 It's difficult to oppose a preferred alternative
13 that certainly tries to consider both the cultural,
14 natural resources, recreational needs, and preservation
15 activities. But let's go back to the history of what
16 this park is, what we tried to do, and what we still need
17 to continue to try and do, and that is preserve open
18 space, a unique ecosystem, as has been mentioned by the
19 superintendent, and by others, as something found no
20 place else in the world. We have Mediterranean
21 ecosystems only in four other places. We have it here.
22 It's special. It's unique.

1. 23 We don't have enough open space preserved. Any
24 management plan and preservation alternative certainly
25 would aim toward that, would work toward setting aside,

1. This information, action, or recommendation has been considered.
Decisions involving this important planning component for the
SMMNRA are outside the scope of the GMP and accompanying DEIS
analysis. Another entity or agency holds the management or decision
making authority for this component. The analysis contained in the
GMP/EIS will be available to assist other SMMNRA decision makers,
however, decisions involving this component will not be made by the
NPS in the ROD for the GMP/EIS.





COMMENTS

RESPONSES

1	working toward getting Congress to provide the money
2	necessary to get more land preserved and protected.
3	I disagree with the statement that the
4	preservation alternative does not fully meet the goals
5	and objectives of the Santa Monica Mountains National
6	Recreation Area. It certainly could meet objectives.
7	And I think that's what we have to work for, the maximum
8	preservation of our open space, with the continued level
9	of educational activities and recreational activities.
10	It certainly doesn't prevent that. We need inclusion
11	into the wilderness preservation system.
12	There's another area that concerns me regardless
13	of the alternative, and I unfortunately haven't had time
14	to evaluate every sentence in this document since it was
15	just made available recently, and that's the west --
16	the -- let's say the 405 corridor, the Getty Center area.
17	This is where we should have a Santa Monica
18	Mountains National Recreation presence. Visitors from
19	all over the world come to Los Angeles, and what do they
20	want to see? Not our mountains. They want to go to a
21	building called the Getty Center, in the mountains. If
22	they're doing that, the visitors and the locals need to
23	see the Santa Monica Mountains Recreation Area to open
24	them up to what is there. We need it here for the
25	17 million residents of Southern California who don't

2. This statement or opinion has been considered. No change has been made to the GMP/EIS. The NPS welcomes the continuing involvement of the public in the management of the SMMNRA and appreciates the thoughtful and committed input received on the GMP/EIS.

3. This comment is generally consistent with the preferred alternative proposed in this GMP/EIS, insofar as the National Park Service is authorized to conduct studies and make recommendations for candidate areas. The designation of wilderness in the National Park Service is an authority reserved for the Congress of the United States

4. This statement or opinion has been considered. No change has been made to the GMP/EIS. The NPS welcomes the continuing involvement of the public in the management of the SMMNRA and appreciates the thoughtful and committed input received on the GMP/EIS.

COMMENTS

RESPONSES

1 know what we have in our backyard.

2 I went to a hearing today on a traffic
3 management proposal for Venice, two streets in Venice.
4 We had the same number of people that we have here for a
5 natural resource. It's because people don't know. We
6 have to reach out and not just sit back and say, you
7 know, "We have it here. Let's do the best we can."

8 We must get the message out there that we have
9 wildlife, we have recreation, we have open space that has
10 to be preserved and protected. Our battle isn't over to
11 preserve and protect this.

5. 12 We must preserve the viewsheds. It's horrible
13 to go hiking, have this recreational opportunity, and see

6. 14 housing. I go to the mountains and I don't want to see
15 the housing. I want to see the resources protected in
16 every way whatsoever. So I think that some more
17 inclusion in that area.

7. 18 Whether or not at this stage of the game you can
19 combine more preservation into the preferred alternative,
20 I don't know if that's possible. I don't know who's

21 going to be making that final decision on this. There's
22 lots of questions that I hope that we don't just have in
23 an individual way, but that we are able to open up if the
24 time is available here.

25 So I want to thank you very much. Keep in mind

5. These comments are consistent with the mission goals and preferred alternative of the Draft General Management Plan (page 40).

6. This statement or opinion has been considered. No change has been made to the GMP/EIS. The NPS welcomes the continuing involvement of the public in the management of the SMMNRA and appreciates the thoughtful and committed input received on the GMP/EIS.

7. This statement or opinion has been considered. No change has been made to the GMP/EIS. The NPS welcomes the continuing involvement of the public in the management of the SMMNRA and appreciates the thoughtful and committed input received on the GMP/EIS.



COMMENTS

RESPONSES

1 that even though we have a small turnout here, we really
2 do care and want to work. The community, the
3 environmental community, in particular, who helped create
4 this area is dedicated to seeing it not only preserved
5 and protected, but expanded. And that's what we have to
6 work for. That's what every alternative has to work for.

7 If we expand our park, then we have something to
8 educate the public about and recreate about. If we lose
9 it, it's gone, and it's gone forever. Thank you very
10 much.

COMMENTS

RESPONSES



Superintendent Arthur Eck
Santa Monica Mountains NRA
401 Hillcrest Drive
Thousand Oaks, Calif 91360

2-28-01

Dear Superintendent Eck,

We in the Gabrielino/Tongva Springs Foundation, support the preservation plan. There are so many artifacts and cultural history to be gleamed from such a vast acreage as the SMMNRA.

- 1. Even though the Tongva occupied the small area from Topanga Canyon east to Griffith Park, artifacts could turn up and we need to preserve them.

The Tongva people were so thoroughly, systematically, and quickly eradicated that little remains.

With the help from California State funding, we are building a Tongva Cultural Center on two acres of land on the University High School campus in west Los Angeles. This was the site of a large Tongva village "Kuruvunga" where the Spanish found the Tongva on August 6, 1769 according to Father Crespi's diary. This site carries State Historical #522 and U.C.L.A. archeological numbers. A 22,000 gallons/day spring flows through the land at the present time.

We appreciate all the hard work and long hours it took to prepare this long document, "General Management Plan & Environmental Impact Statement." We hope the land can be preserved at the highest level. We can be reached at the address below. Good Luck!

Sincerely yours,

Loretta Ditlow, Director
13686 Bayliss Road
Los Angeles, California
Phone: 310-472-2415, Fax: 310-472-7276

- 1. This information, action , or recommendation has been considered. No change has been made to the GMP/EIS. Please see the list of park missions, in which preserving the cultural and historic heritage of the area is a goal in park planning.



COMMENTS

RESPONSES



3220 Nebraska Avenue
Santa Monica CA 90404

ph 310 453 0395
fax 310 453 7927

info@healthebay.org
www.healthebay.org

May 31, 2001

Superintendent Art Eck
Santa Monica Mountains National Recreation Area
401 W. Hillcrest Drive
Thousand Oaks, CA 91360-4207

RE: General Management Plan and Environmental Impact Statement for the Santa Monica Mountains National Recreation Area

Dear Superintendent Art Eck,

Heal the Bay is nonprofit environmental advocacy group dedicated to making Southern California coastal waters safe for people and marine life. Heal the Bay has reviewed the General Management Plan and Environmental Impact Statement and has several comments. Heal the Bay supports the Preferred Alternative because it balances preservation of the unique wildlife in the Santa Monica Mountains with public recreational and educational uses of the area. Our comments are divided into two sections: general comments directed toward all five alternatives and specific comments addressing the individual plan alternatives.

General comments applicable to all alternatives (comments are listed by page number)

1.

1	Pg 63, para. three - Water Resources Change the words "would" and "feasible" to "will" and "applicable." The National Park Service (NPS) needs to implement post-construction best management practices (BMPs) at all new and redevelopment facilities.
---	--
2.

1a.	Page 63, para one - Water Resources The NPS should consult the California Stormwater Best Management Practices Handbook for Construction Activities for additional construction BMPs.
-----	--
3.

2	Page 63, para one - Water Resources Construction stormwater management plan should go beyond requirements of the Standard Urban Stormwater Mitigation Plan (SUSMP) and Stormwater Quality Management Plan (SQUMP). The NPS should take advantage of this opportunity to set the standard for what can be implemented to prevent stormwater and urban runoff from entering our streams and the Santa Monica Bay.
---	--
4.

3.	Page 63, para. four - Water Resources Change the words "would" and "minimize" to "will" and "eliminate." No argument can be made for allowing new or existing sources of fecal bacteria to be discharged into local receiving waterbodies. Malibu Creek and Las Virgenes Creek are listed in the EPA's 1998 303(d) list as impaired for both nutrients and coliform. These waterbodies are
----	---

1. This information, action, or recommendation has been considered. The GMP/DEIS text has been changed as follows: The word "feasible" has been replaced with "applicable". The word "would" remains for consistency with the rest of the document.
2. This information, action, or recommendation has been considered. The GMP/DEIS text has been changed as follows: Reference to the California Stormwater BMP Handbook has been added.
3. These comments are consistent with the mission goals and preferred alternative of the Draft General Management Plan (page 54). They speak to a level of concern, however, more detailed than the present document. They will be retained for formulation in appropriate site-specific plans as well as future revisions to the Water Resources Management Plan.
4. This information, action, or recommendation has been considered. The GMP/DEIS text has been changed as follows: The word "minimize" has been changed to "eliminate". The word "would" remains for consistency with the rest of the document.

COMMENTS

RESPONSES



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- 4. severely polluted due to excessive amounts of these constituents and can not assimilate new sources
- 5. Any general management plan adopted by the NPS should include requirements similar to, or more stringent than, the requirements in the recently-adopted Los Angeles Regional Water Quality Control Board's Waste Discharge Requirements (WDR) for small commercial and multi-family residential subsurface sewage disposal. These requirements apply to those septic systems discharging less than 20,000 gallons per day. The WDR requires existing and new dischargers to develop a monitoring and reporting program for a number of constituents including nutrients and fecal bacteria indicators, develop a spill response plan, and ensure that no portion of the seepage pit or leach field extends to within five feet of the water table under any circumstance. (Those facilities with leach fields or seepage pits within 5 to 10 feet of the water table must provide disinfection at a level equivalent to secondary treatment.) In addition, the WDR prohibits the installation or construction of a septic system within 100 feet of any stream, channel, watercourse, or waterbody. The NPS should review the location of existing septic systems and relocate any that do not meet the above requirements.
- 6. 4 Page 63, para five - Water Resources
A study determining the flow regimes within the various sub-watersheds and available groundwater supplies should be completed prior to the extraction of water for human consumption or irrigation. This study needs to determine the minimum amount of water required to sustain healthy floral and fauna populations, looking at various temporal conditions, accounting for seasonal and yearly differences.
- 7. 5 Page 64, para five - Biological Resources and Wetlands
The wording in the first sentence should not include "offset impacts" since this implies mitigation. The sentence should read, "The administering agencies will reduce impacts from new developments by avoiding wetlands, other sensitive habitats and habitat linkage areas through careful project siting".
- 8. 6 Page 267, para. six, under Cumulative Impacts
The cumulative runoff flows from a given NPS facility may be minimal compared to other developments in the watershed. However, impacts due to runoff from NPS facilities may be significant when discharged into smaller creeks. For example, if the NPS facility is the only source of runoff to a small tributary, the impacts from this discharge can be significant in altering the local habitat. The NPS should reexamine the potential for their runoff to impact local waterways.
- 9. 7 Page 272, para one - Vegetation
Construction should be prohibited during the rainy season due to the highly eroding soils found in the Santa Monica Mountains. The runoff from such construction sites significantly increases the rate of sedimentation to streams, which can suffocate freshwater organisms such as macro-invertebrates and juvenile fish. Heal the Bay

- 5. The National Park Service concurs and has standards already in effect that meet or exceed these requirements. They will be applied in the construction of any applicable project, assuming all other environmental reviews and considerations are satisfied.
- 6. The National Park Service has no current plans for facilities or operations that would require the extraction of additional water from the Santa Monica Mountains.
- 7. This paragraph was deleted because the administering agencies have no jurisdiction over new development near wetlands and sensitive habitat.
- 8. This information, action, or recommendation has been considered. The analysis of environmental consequences contained in the DEIS has been modified on page 267.
- 9. The National Park Service agrees that construction should be avoided during the rainy season and, except in emergency situations, likewise avoids this practice during the winter. The text cited has been revised to reflect that existing practice.



COMMENTS

RESPONSES



3220 Nebraska Avenue ph 310 453 0395 info@healthebay.org
 Santa Monica CA 90404 fax 310 453 7927 www.healthebay.org

9. believes the BMPs typically implemented at construction sites are ineffective at stopping sediment-laden runoff from leaving the site. The only effective BMP during wet weather is a prohibition on construction

Specific Comments on all Plans except for the preferred alternative.

No Action Alternative

10. The "no-action" alternative is lacking because of its failure to include boundary studies on the north and west perimeters of the Santa Monica Mountains Recreation Area. Without such boundary studies, the NPS has no knowledge of sensitive wildlife habitats that require protection or the information necessary to prioritize land acquisitions to improve wildlife corridors. Boundary studies enable the NPS to uphold and abide by its mission, which is to protect, enhance and maintain the area's natural resources. Therefore this general management plan is an unacceptable alternative in its current format.

Preservation Alternative

11. The "preservation" alternative provides for the greatest number of boundary studies relative to the other alternatives by creating numerous opportunities to ensure that wildlife corridors are maintained and extended, and new corridors developed. With boundary studies, the NPS is able to determine sensitive wildlife habitats that require protection and can prioritize land acquisitions to improve wildlife corridors. Boundary studies enable the NPS to uphold and abide by its mission, which is to protect, enhance and maintain the area's natural resources. Heal the Bay prefers this general management plan as an acceptable viable alternative in its current format.

Education Alternative

12. The "education" alternative proposes scenic corridors throughout the Santa Monica Mountains National Recreation Area to be used by automobiles and limited boundary studies. The problems with the "education" alternative include increased automobile usage within the park area which translates to increased traffic and polluted runoff to receiving waterbodies; increased fragmentation of habitat corridors which reduces their effectiveness; and a reduction in the development of new corridors due to the limited number of boundary studies to be undertaken. Therefore this general management plan is an unacceptable alternative in its current format.

Recreation Alternative

13. The "recreation" alternative has negative impacts similar to the education alternative. In addition, this alternative increases high-intensity land use areas by 100% and decreases low-intensity land use areas by 60% compared to the "education" alternative and proposes no boundary studies. For reason already stated in the "no action" and "education" alternative, Heal the Bay views this general management plan as an unacceptable alternative in its current format.

- 10. These comments are generally consistent with the preferred alternative proposed in this GMP/EIS. These comments are understood to support the preferred alternative.
- 11. This information, action, or recommendation has been considered. The Preservation Alternative contained in the DEIS has been modified on page 70. These comments are generally consistent with the preferred alternative proposed in this GMP/EIS.
- 12. These comments are generally consistent with the preferred alternative proposed in this GMP/EIS.
- 13. These comments are generally consistent with the preferred alternative proposed in this GMP/EIS.

COMMENTS

RESPONSES



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If you have any questions regarding our comments, please feel free to contact us at (310) 453-0395

Sincerely,

Mark Gold
Mark Gold, D Env
Executive Director

Shelley Luce
Shelley Luce
Staff Scientist

Shelly Magier
Shelly Magier
Executive Assistant

Consultation and Coordination
Comments and Responses - Organizations

01 05:17P HEAL THE BAY 310 453 7927 P. 5





COMMENTS

RESPONSES

Date: 05/30/2001 3 18 PM
Sender: nobody@itc nps gov (Nobody)
To: SAMO GMP
Priority: Normal
Subject: Comments on the General Management Plan

Name: John Low
 Address: 25629 Buckhorn Drive
 City, State/Province: Calabsas, CA
 Postal Code: 91302

The Board of Directors of the Monte Nido Valley Community Association has reviewed the Draft General Management Plan and Environmental Impact Statement for the Santa Monica Mountains National Recreation Area and have the following comments.

1. In general, we agree that the preferred alternative presented in the Plan is the best of those presented. The concept of concentrating development of park facilities in areas where development has taken place makes sense along with the designation of 80% of the public lands for preservation. We are strongly in favor of establishing an administration and education center at the King Gillette Ranch. We have long favored this use as the most appropriate for that particular site. We also strongly support the extension of SMMNRA boundaries to provide additional resource protection along the north central boundaries of the park. Also, we strongly favor the completion of the Backbone Trail and the establishment of an adequate budget to maintain and repair the trail promptly especially when it is damaged or deteriorates. In addition, equestrians in our community would support the establishment of a horse camping facility in Malibu Creek State Park

We have two principal concerns related to the increased use projected for the National Recreation Area. Our community is especially vulnerable to wildfire located as it is on the edge of the Malibu Creek fire corridor and we are concerned about an increased risk of "unplanned" fires. We urge that fire prevention and safety information be posted or made available at trailheads and staging areas for the Backbone Trail and other trails outside of established parks. This would help to insure that visitors who do not enter the trail through a State Park kiosk are aware of the danger of wildfire

1. These comments are generally consistent with the preferred alternative proposed in this GMP/EIS. Specific suggestions will be retained for later use during more detailed planning efforts.

COMMENTS

RESPONSES

and their role in preventing it. Our other concern is the impact of traffic on the principal access roads in the area. Currently access to park facilities requires the use

2.

of a private automobile. We encourage development of a transportation system within the park that will connect existing public transportation and visitor facilities along the park perimeter to internal park facilities.
--

A visitor should be able to have a grand day out in the park without bringing their car.

In general, members of the Monte Nido Valley Community Association are pleased with the SMMNRA Draft Management Plan and look forward to its adoption.

Received: from ultraman.itc.nps.gov ([216.88.32.134]) by ccmall.itd.nps.gov with SMTP

(IMA Internet Exchange 3.13) id 00B44268; Wed, 30 May 2001 15:28:04 -0400

Received: by ultraman.itc.nps.gov (8.8.8+Sun/SMI-SVR4) id PAA18029; Wed, 30 May 2001 15:18:56 -0400 (EDT)

Date: Wed, 30 May 2001 15:18:56 -0400 (EDT)

From: nobody@itc.nps.gov (Nobody)

Message-Id: <200105301918.PAA18029@ultraman.itc.nps.gov>

To: samo_gmp@nps.gov

Subject: Comments on the General Management Plan

Content-Type: text

2. These comments are generally consistent with the preferred alternative proposed in this GMP/EIS. Specific suggestions will be retained for later use during more detailed planning efforts.



COMMENTS

RESPONSES

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RUTH KILDAY: Ruth Kilday, K-I-L-D-A-Y. Today I'm representing both myself personally and the Mountains Conservancy Foundation where I am on the board of directors and our letter, official letter, will be coming later. But I just wanted to mention a couple of things that will be within the letter.

No. 1, the expansion of the boundaries we

Comment period - Friday, 2/9/2001
NPS, Thousand Oaks, CA.

COMMENTS

RESPONSES

1.	1	wholeheartedly agree on both sides of the Santa Monica
	2	Mountains, on the east and west side down to the
	3	Calleguas Creek, but also to include Griffith Park as it
	4	mentioned within the general management plan. And if
	5	that isn't politically feasible at this time, and
2.	6	perhaps it will be with the new mayor, to at least
	7	include a contact visitor point and to stress the
	8	purpose of doing a resource inventory on the 4,000-plus
	9	acres in Griffith Park. I don't know whether an
	10	official one has ever been done on that land, and if it
	11	is it's fragmented and very old, so it's critical.
	12	I think especially with all of the attention now on
	13	the L.A. River how important Griffith Park is and the
	14	importance of making the connection that that is in fact
	15	the east end of the Santa Monica Mountains, and I would
	16	like to support the Conservancy and the work they are
	17	doing in actually coming up with connections between
	18	Griffith Park and Topanga.
3.	19	The other part of this is the Backbone Trail and how
	20	important we think that is in it's completion and in the
	21	plan that will be detailed about overnight
	22	accommodations, about how we use it, the maintenance of
	23	it, I think that's critical.
4.	24	Another is the importance of the historic resources
	25	within the Santa Monica Mountains and how that all

1. This statement or opinion has been considered. No change has been made to the GMP/EIS. The NPS welcomes the continuing involvement of the public in the management of the SMMNRA and appreciates the thoughtful and committed input received on the GMP/EIS.
2. This statement or opinion has been considered. No change has been made to the GMP/EIS. The NPS welcomes the continuing involvement of the public in the management of the SMMNRA and appreciates the thoughtful and committed input received on the GMP/EIS.
3. This comment is generally consistent with the preferred alternative proposed in this GMP/EIS. Both the preferred and the recreation alternatives have been amended to include the overnight trail camps proposed in the Santa Monica Mountains Area Recreational Trails Coordination Project Report. The precise implementation of the camps will be established in specific development plans that are beyond the scope of this document in detail. The description of the affected environment contained in the DEIS has been modified. Other remarks speak to concerns more detailed than the scope of the General Management Plan. They will be used in the formulation of a Draft Trail Management Plan, expected for release sometime in late 2002 or early 2003.
4. These comments are generally consistent with the preferred alternative proposed in this GMP/EIS. Specific suggestions will be retained for later use during more detailed planning efforts.



COMMENTS

RESPONSES

1 relates to the Anza expedition and to the forming of
 2 this city and this area and the import of the Spanish
 3 land grants, the forming of those, and I also think it's
 4 very important for us to be using our historic resources
 5 for educational activities as opposed to housing. I
 6 know that that's an accommodation you have had to make,
 7 but really the importance of opening up these resources
 8 for public use is, I think, critical.

9 And I think that's all I have but I wanted to thank
 10 everyone for the good work you have done and I agree
 11 with Margo. There should be thousands of people that
 12 are a part of this process. But at any rate, we just go
 13 from where we are at the moment. Thanks.

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5. This statement or opinion has been considered. No change has been made to the GMP/EIS. The NPS welcomes the continuing involvement of the public in the management of the SMMNRA and appreciates the thoughtful and committed input received on the GMP/EIS.

COMMENTS

RESPONSES

Mulholland Scenic Parkway Design Review Board

*Lynette Berg Robe, Chair
12711 Ventura Blvd , Suite 450
Studio City, California 91604
(818) 980-9964
Fax (818) 980-7141*

May 23, 2001

Via Fax and U.S. Mail

Arthur Eck, Superintendent
Santa Monica Mountains NRA
401 Hillcrest Drive
Thousand Oaks, California 91360

Re. Draft General Management Plan/Environmental Impact Statement for the Santa Monica Mountains National Recreation Area

Dear Superintendent Eck.

The Mulholland Scenic Parkway Design Review Board has had the opportunity to review the General Management Plan and Environmental Impact Statement. It represents a great collective effort. Considerable thought as to each alternative is evident.

1. The Mulholland DRB supports the "Preferred Alternative." While "Preservation" to the fullest extent is the goal for all of us, it is clear that the park has to be used by the public in order to justify the government's expenditure. The Preferred Alternative provides for 80% of the land to be preserved, with only 20% for recreation and education. Of that, only 5% is to be "high intensity." This is desirable, as it means that people using the park will be able to have a meaningful experience, and it means that only a small portion of the park will be adversely impacted by the use. Unfortunately, we can love our parks to death without this kind of planning
2. The one omission that we can see is that there is no indication of the "Core Trail" in the Mulholland Drive right of way from roughly the Hollywood Bowl Overlook to Topanga. I enclose with this a copy of Section 8 of the Mulholland Scenic Parkway Specific Plan, Los Angeles City Ordinance 167, 943. This section provides for the creation of the trail and describes it. Unfortunately, in the nine years since the ordinance was adopted by the City Council, nothing has been done to implement Section 8.

The Design Review Board has called for Public Works and the Planning Department to get together and start to plan the trail. The trail is shown on the Planning Department's maps. The right of way East of Laurel Canyon is 100 feet, and West of Laurel Canyon to

1. This statement or opinion has been considered. No change has been made to the GMP/EIS. The NPS welcomes the continuing involvement of the public in the management of the SMMNRA and appreciates the thoughtful and committed input received on the GMP/EIS.
2. These remarks speak to concerns more detailed than the scope of the General Management Plan. They will be used in the formulation of a Draft Trail Management Plan, expected for release sometime in late 2002 or early 2003.



COMMENTS

RESPONSES

Arthur Eck, Superintendent
Page 2
05/24/01

Topanga, it is 200 feet. This could be a 22-mile long park and would add another recreational opportunity in the Scenic Corridor in your plan. As you can see from Section 8, the proposed Core Trail would have two trails separated to the extent possible, one for hiking and one for equestrian. At this time, we do not know how feasible the equestrian trail is. That may only be realized in certain areas. It should be possible, however, to fully implement the hiking trail the full 22 miles. Part of the trail will run through NRA areas

3. We request that you consider adding a designation of the Core Trail in the Preferred Alternative. This would still be a low density use in the Eastern part of the Santa Monicas. Like some of the other parks, this one would involve cooperative management with the City of Los Angeles

I hope that you will consider this addition. As your management plan is to encompass the next 15 to 20 years, we sincerely hope that the Core Trail will be implemented well before the end of that time period.

Yours truly,



Lynette Berg Robe

cc: Hon. Robert W. Hertzberg, Speaker, State Assembly
Hon. Sheila James Kuehl, State Senator
Hon. Paul Koretz, State Assembly
Hon. Fran Pavley, State Assembly
Hon. Joel Wachs, 2nd Council District
Renee Weitzer, Field Deputy 4th Council District
Hon. Michael Feuer, 5th Council District
Sharon Mayer, Field Deputy
Hon. Cindy Miscikowski, 11th Council District
Lisa Levy Bush, Field Deputy, 11th Council District
Con Howe, Department of Planning
Ellen Stein, President, Board of Public Works
Maribel Marin, Commissioner Board of Public Works
Ron Lorenzen, Street Services, Department of Public Works
Gregg Scott, Street Services, Department of Public Works
Vitaly B. Troyan, P.E., Chief Engineer, Department of Public Works
Joseph Edmiston, Executive Director Santa Monica Mountains Conservancy
Jerry Daniel, Santa Monica Mountains Conservancy
Paul Edelman, Santa Monica Mountains Conservancy
Barry Read, Mulholland Tomorrow
Steve Twining, Chairman Federation of Hillsides and Canyons Associations
Polly Ward, President Federation of Hillsides and Canyons Associations

3. These remarks speak to concerns more detailed than the scope of the General Management Plan. They will be used in the formulation of a Draft Trail Management Plan, expected for release sometime in late 2002 or early 2003.

COMMENTS

RESPONSES

Arthur Eck, Superintendent
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Tony Lucente, Studio City Residents Association
Joan Luchs, Cahuenga Pass Homeowners Association
Gordon Murley, Woodland Hills Homeowners Association
Sue Nelson
Lottie Melhorn
Members of the Mulholland Scenic Parkway Design Review Board
 Vice Chair, Jenna Abouzeid
 Fiona Dunne
 Alan Dymond
 Sara R. Nichols
 Tom Rule

*Consultation and Coordination
Comments and Responses - Organizations*



COMMENTS

RESPONSES

NATIONAL PARKS CONSERVATION ASSOCIATION

Protecting Parks for Future Generations

31 May 2001

Superintendent
Santa Monica Mountains National Recreation Area
401 W Hillcrest Drive
Thousand Oaks, CA 91360-4207

RE: SANTA MONICA MOUNTAINS NATIONAL RECREATION AREA
DRAFT ENVIRONMENTAL IMPACT STATEMENT AND GENERAL
MANAGEMENT PLAN

VIA FAX AND U.S. MAIL

Dear Superintendent

National Parks Conservation Association (NPCA) is America's only private, nonprofit
citizen organization dedicated solely to protecting, preserving, and enhancing the U.S
National Park System. Founded in 1919, NPCA has over 400,000 members, 65,000 of
whom live in California.

Thank you for the opportunity to comment on the abovementioned document. Overall,
we encourage the park to establish the highest protection measures to restore and protect
the park's resources "unimpaired for the enjoyment of future generations"

In general, NPCA supports the NPS' identified "Preferred Alternative", with some
exceptions. We strongly support the designation of 80% of the land in the park for "low
intensity" uses. This is entirely appropriate for a park that encompasses such rugged
terrain, as well as areas of habitat that are either unique or have been largely eliminated
from other areas of Southern California. For example, SMMNRA contains prime
examples of Valley Oak Savannas, which have been severely impacted or eliminated in
other areas. Preservation of such resources must be a high priority for the park. NPCA
also believes that given the pressures of urbanization surrounding the park and the nature
of NPS holdings within the boundary, the park must place a high priority on maintaining
habitat corridors and linkages between the larger blocks of undeveloped habitat it
controls.

- 1. [Text from previous block]

Low Intensity Zone Proposals

- 2. NPCA supports the NPS' intent to inventory the park lands north and west of the Circle
X Ranch for possible wilderness designation and would strongly support such
designation

- 1. This information, action, or recommendation has been considered. The
commenter's conclusions and concerns are shared by the National Park
Service. The description of the affected environment contained in the
DEIS has been modified. The preferred alternative element pertaining
to connectivity has been modified to reinforce the importance of
wildlife corridors.
2. This comment is generally consistent with the preferred alternative
proposed in this GMP/EIS. Specific suggestions will be retained for later
use during more detailed planning efforts.

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COMMENTS

RESPONSES

3. NPCA agrees with NPS' intent to protect watersheds and coastal resources through coordinated watershed management practices. However, we are concerned by reports that the water resources shown on the map in Figure 10 may contain serious inaccuracies, and would encourage a careful review of the data therein to ensure that there is an accurate and well accepted base for decision making. We also strongly support all efforts to restore steelhead trout runs in Solstice Canyon and to preserve and enhance steelhead trout runs in the Malibu Creek and Arroyo Sequit watersheds.

Moderate Intensity Zone Proposals

4. In general, we find most of the areas designated "moderate intensity" as appropriate. However, we would like to reinforce the comments of the Sierra Club with regard to the management zoning of the Cheesboro/Palo Comado Canyons and Las Virgenes Canyon. These areas have high wilderness and habitat values and minimal human disturbance, and form an important habitat corridor to wild areas to the north. Such significant blocks of territory should not be given a blanket "moderate intensity" management designation.

5. That designation should be limited to those small areas where moderate impacts are already occurring (such as parking lots) or low impact activities are planned.

High Intensity Zone Proposals

6. NPCA strongly agrees with the NPS' plans to site a "jointly operated administration, environmental and cultural education center" at the Gillette Ranch site to be managed in conjunction with California State Parks. This is a very appropriate site for a visitor and interpretive center and staging area easily reached from Los Angeles.

7. NPCA also supports the development of a "Mugu Lagoon Visitor Education Center". This facility would provide an excellent opportunity for visitor education at an extremely significant wetland site. However, we have reservations regarding the proposed boardwalk, which in the preferred alternative would go "around" the lagoon. NPCA is concerned about possible disruption and ongoing disturbance of the lagoon ecology that may result from construction and visitation. Though we appreciate the educational value of a boardwalk, we note that the "Preservation Alternative" calls for a boardwalk "into"

8. the lagoon and not around it. While the siting of any such structure is of concern, we believe that if a boardwalk is built, it should be minimally intrusive to the lagoon habitat.

9. We support NPS' proposal for interpretive facilities and activities at the Paramount Ranch. However, we also understand that parts of this site may be suitable for Valley Oak savanna and grassland habitat restoration. We would encourage that such restoration be included in plans for this site.

10. NPCA also supports the proposal for a scenic coastal boat tour as a way of giving visitors a unique perspective of the park and its connection to the coast. We would urge that the boats employ the best available technology for pollution reduction. We would also encourage the tour to encompass the western portions of the park as far as Point Mugu if practical. In addition to exploring SMMNRA resources from a different perspective,

3. This information, action, or recommendation has been considered. The National Park Service recognizes that there is a shortage of good, reliable information on water resources in the Santa Monica Mountains. A considerable number of differing opinions and definitions have been used to categorize these resources in the past. The information presented in the GMP represents the best data the USGS had at the time the plan was prepared. However, as part of the park's recently funded Inventory and Monitoring Program, an effort has been initiated to survey and verify the characteristics of streams and other water bodies throughout the park. This past year, the park began stream monitoring surveys as part of this effort. Because the understanding of park resources is (and always should remain) dynamic, the best and most current available information will always prevail in guiding park decision-making.

4. This comment is generally consistent with the preferred alternative proposed in this GMP/EIS. Specific suggestions will be retained for later use during more detailed planning efforts.

5. This statement or opinion has been considered. No change has been made to the GMP/EIS. The NPS welcomes the continuing involvement of the public in the management of the SMMNRA and appreciates the thoughtful and committed input received on the GMP/EIS.

6. This comment is generally consistent with the preferred alternative proposed in this GMP/EIS. Specific suggestions will be retained for later use during more detailed planning efforts.

7. This comment is generally consistent with the preferred alternative proposed in this GMP/EIS.

8. This comment is generally consistent with the preferred alternative proposed in this GMP/EIS. Specific suggestions will be retained for later use during more detailed planning efforts.

9. This comment is generally consistent with the preferred alternative proposed in this GMP/EIS. Specific suggestions will be retained for later use during more detailed planning efforts.



**COMMENTS****RESPONSES**

these tours should also take the opportunity to educate regarding marine resources as well.

11. NPCA also applauds the idea of locating visitor information sites at the Los Angeles airport and at El Pueblo in downtown Los Angeles. These are excellent opportunities for outreach to underserved populations. We also support the expanded educational day camp program propose for the William O Douglas Outdoor Center at Franklin Canyon.

Scenic Corridor

12. NPCA supports the proposed Scenic Corridor designations, and believes that NPS may want to consider other roads for classification as scenic corridors as well. NPCA considers the proposal for a tour shuttle an excellent one. It is vital in general that the National Park System give people opportunities to access their parks by means other than private automobiles. We encourage NPS to consider a long-term plan for shuttle service expansion beyond this proposal, such as service to Point Mugu State Park and Cheesboro Canyon.

Actions Common to All Alternatives

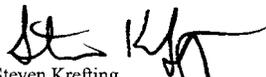
NPCA specifically wants to express its support for the actions proposed under the "Moderate Intensity" section, namely the environmental education facility at Solstice Canyon, the completion of the Backbone Trail and the education facility on Native American Indian culture at Rancho Sierra Vista.

Under the "High Intensity" actions, NPCA shares the concern expressed by others regarding the proposed expansion of the staging area at Cheesboro Canyon. Any such expansion must avoid impacting areas of Valley Oak savanna habitat.

13. We support all the proposals under "Low Intensity" management, and strongly support the efforts outlined under "High Intensity" to increase non-automobile based transportation options for access to the park.

Santa Monica Mountains NRA is a unique unit in the National Park System, not only because of the significant habitat and recreational opportunities it provides in close proximity to a huge urban area. It preserves an incredibly important example of a Mediterranean-type ecosystem and contains an enormous number of noteworthy archeological and cultural sites. We thank NPS for this opportunity to contribute to the design of the future of Santa Monica Mountains National Recreation Area through its General Management Plan. Please feel free to contact us with any questions or comments and please update us on future developments.

Sincerely,



Steven Krefting
Associate Regional Director

10. This comment is generally consistent with the preferred alternative proposed in this GMP/EIS.

11. This comment is generally consistent with the preferred alternative proposed in this GMP/EIS.

12. This comment is generally consistent with the preferred alternative proposed in this GMP/EIS. Specific suggestions will be retained for later use during more detailed planning efforts.

13. This comment is generally consistent with the preferred alternative proposed in this GMP/EIS.

COMMENTS

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PACIFIC PALISADES COMMUNITY COUNCIL

The Eyes, Ears, and Voice of the Pacific Palisades Community
Post Office Box 1131, Pacific Palisades, California 90272

May 29, 2001

Arthur E. Eck, Superintendent.
Santa Monica Mountains National Recreation Area
401 West Hillcrest Drive
Thousand Oaks, CA 91360

Re: Draft General Management Plan/ Environmental Impact Statement,
Santa Monica Mountains National Recreation Area

Dear Superintendent Eck:

The Santa Monica Mountains National Recreation Area is a cooperative effort between the National Park Service, the California State Parks, and the Santa Monica Mountains Conservancy, and the General Management Plan is a cooperative plan for the three agencies. The Pacific Palisades Community Council has a strong interest in the proposed plan because our community has been a leader in the acquisition of park land and the development of recreational facilities and trails supporting the recreation area within our boundaries. The Board of the Council therefore submits the following comments relative to the Draft.

The Santa Monica Mountains National Recreation Area presents unique challenges because as stated on p. 52 of the Plan "SMMRA can be described as an island of parklands buffeted by urban development and urban challenges." While most of the public sees the Area as an opportunity to preserve nature, others see it as a recreational resource. The challenge is to balance the two interests which appear to be the object of the Plan.

It is a given that the more public access into the Area, the more damage will be done to its natural resources. The problem is made more acute by the fact that human intrusion into the Area already is excessive because of the numerous roads that traverse the Area and the large developments that already exist in the Area. Yet, unless the public has access into the mountains, the opportunity that the Area presents for the public to experience and enjoy nature will be lost.

1. The problem is to maximize public access while at the same time minimizing the damage it will do to the fragile ecology of the Area. While the Draft General Management Plan/ Environmental Impact Statement attempts to address this issue, it falls short in its efforts. The Plan sets forth five alternatives, but only three are relevant to this discussion. First, is the Preservation Alternative, which would severely restrict public access. The second is the Recreation Alternative, which would maximize public access. The third is the Preferred Alternative, which we believe

1. This statement or opinion has been considered. No change has been made to the GMP/EIS. The NPS welcomes the continuing involvement of the public in the management of the SMMNRA and appreciates the thoughtful and committed input received on the GMP/EIS.

These issues are identified at a general level (page 38) in the GMP/EIS commensurate with the detail level of the plan. Efforts to resolve some of these conflicts will require proposals more detailed than the scope of the General Management Plan. The concerns expressed here will be used in the formulation of a Draft Trail Management Plan, expected for release sometime in late 2002 or early 2003.





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balances the Preservation Alternative with the Recreation Alternative

The Impact of Mountain Bikes and Horses Is Not Adequately Addressed.

The impact of the use of mountain bikes and horses in the Area is never really discussed It is set forth as a major issue on page 38 where it is stated that one of the two Visitor Experience Issues is:

- Conflicts among different recreational users, such as mountain bikers, horseback riders and hikers, detract from the quality of the SMMNRA experience."

Then on page 41, the Issue is discussed in Visitor Experience Goals:

- Anticipate and manage potential conflicts among recreational uses. Appropriately enhance the visitor experience and provide a safe and conflict-free environment."

2. The problem is that neither the Issue nor the Goal is further addressed in the Draft General Management Plan/ Environmental Impact Statement and they should be under the National Environmental Policy Act (NEPA). While the Visitor Experience is discussed within each Alternative, there is no mention of the impact, if any, of the use of mountain bikes and horses There is one sentence in the Preferred (p 287), Preservation (p. 321) and the Education (p. 356) Alternatives which discuss multi-use trails in areas managed for moderate intensity These sentences only state that any restrictions will have moderate adverse impacts on visitors who enjoy multi-use trails. But those brief statements do not discuss conflicts between types of users nor do they discuss the impacts on visitors in low and high intensity uses nor do they define which types of users will suffer adverse impacts.

3. Moreover, nothing at all relating to restrictions on the use of multi-use trails appears in either the Recreation and the No Alternatives.

4. What is missing from the Plan/EIS is a discussion of the existing situation regarding the use of mountain bikes and horses There is no discussion of the extent of the use, to what extent, if any, conflicts have occurred, to what extent, if any, there is evidence of environmental damage from the use of mountain bikes and horses, what steps are currently being used to prevent any possible conflicts and environmental damage, and how effective they have been. There is no base line of information. Describing the existing environment, in particular focusing on resources and conditions in the human environment which will be affected by the proposed action or alternatives, is required. (40 CFR1502.15). The problem is that there is insufficient data in the Plan/EIS to quantify the impacts. Unless they are quantified, the requirement that "Environmental impacts and values must be 'identified in adequate detail so they can be compared to economic and technical analyses'" will not be satisfied (40 CFR1501 2(b)).

Handwritten initials/signature

2. These issues are identified at a general level (page 38) in the GMP/EIS commensurate with the detail level of the plan. Efforts to resolve some of these conflicts will require proposals more detailed than the scope of the General Management Plan. The concerns expressed here will be used in the formulation of a Draft Trail Management Plan, expected for release sometime in late 2002 or early 2003.
3. These issues are identified at a general level (page 38) in the GMP/EIS commensurate with the detail level of the plan. Efforts to resolve some of these conflicts will require proposals more detailed than the scope of the General Management Plan. The concerns expressed here will be used in the formulation of a Draft Trail Management Plan, expected for release sometime in late 2002 or early 2003.
4. These issues are in fact identified at a general level (page 38) commensurate with the detail level of the plan. Concerns about environmental baseline data are addressed on pages 173-175. Specific management proposals will be addressed in the Trail Management Plan.

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Recommendations Regarding Mountain Bikes.

Encountering a speeding mountain bike on a narrow hiking trail destroys any hope of a pleasant hiking experience, even if no collision occurs. This question of balancing the rights of hikers and bikers needs to be examined for each of the proposed planning alternatives.

In areas administered by State Parks in this community, the general rule is that bicycling is permitted on fire roads and, with the exception of one trail, is prohibited on trails. This compromise has been generally acceptable to both the hikers and bikers.

5. Concerning the hiker-biker issue we would suggest the following:
- That the State Park compromise be considered as a guideline for the entire Recreation Area.
 - That local managers be given discretion to open or close trails or sections of trails to bicycling based on their knowledge of local conditions.
 - That a plan of adequate enforcement and education be adopted which will mitigate the impact, if any, of mountain biking. At present there is *near zero* enforcement, a condition permitting a handful of scofflaw bikers to spoil the hiking experience for some without fear of penalty.

Horseback Use of Trails.

As stated previously, horses are very much a part of the Plan Area. While ranching was the source of early use of the Plan area, ranching has been supplanted with recreational riding. Since the late 1920's many estates and homes with stables, stables, and riding clubs have been established in and on the periphery of the Plan Area. Riders from these commonly use the Plan Area for recreational riding.

Recreational riding has presented only minor conflicts between hikers and horse riders. Horse riders very rarely ride their horses at more than a walk. The major complaint hikers have is with the horse droppings on the trails.

Many homes and estates that have stables have established trails from their properties into the mountains. While most of these trails are inaccessible to the public, some are. This creates a problem with the term "multi-use." If those trails which connect to public trails are not designated as "multi-use," then these trails will not be open to horse riders even though horse riders in many cases established these trails.

6. This problem is not addressed in the Plan/EIS and should be. Perhaps an additional trail designation needs to be created such as "hiker/horse trails."

5. These remarks speak to concerns more detailed than the scope of the General Management Plan. They will be used in the formulation of a Draft Trail Management Plan, expected for release sometime in late 2002 or early 2003.
6. These issues are identified at a general level (page 38) in the GMP/EIS, commensurate with the detail level of the plan. Efforts to resolve some of these conflicts will require proposals more detailed than the scope of the General Management Plan. The concerns expressed here will be used in the formulation of a Draft Trail Management Plan, expected for release sometime in late 2002 or early 2003.



COMMENTS

RESPONSES

415 PCH, Marion Davies Home.

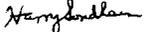
7. There is a problem with including the Marion Davies Home at 415 Pacific Coast Highway in Santa Monica in the General Management Plan. Santa Monica is remote from the Santa Monica Mountains. It has no frontage on the mountains. Santa Monica Beach is as relevant a beach to the Santa Monica Mountains as is Venice Beach or Manhattan Beach. It is not a contiguous recreational resource for users of the Santa Monica Mountains.

It seems that the only reason it is included in the Plan is to qualify it for funding out of National Park funds. That means that any funding would be at the expense of other projects in the Plan Area. Therefore we oppose its inclusion.

Los Liones Canyon State Park.

8. Los Liones Canyon State Park is a major trail head leading into Topanga State Park. While it is shown on the Alternative Maps, it is not identified. More crucially, it is not identified either on Figure 3, Current Park Ownership, or Figure 4, Existing Conditions & Recreational Opportunities, or described in the inventory of California State Parks on pages 28-30 We believe it should be identified.

Thank you for your consideration.

Yours truly,

 Harry Sondheim, Chair

7. This statement or opinion has been considered. No change has been made to the GMP/EIS. The NPS welcomes the continuing involvement of the public in the management of the SMMNRA and appreciates the thoughtful and committed input received on the GMP/EIS. Notwithstanding this commenter's concern, the national recreation area includes the beaches in the city of Santa Monica. From the standpoint of recreationists who come to the park, the level of use is upwards from 20 times greater than those in the mountains. Understanding the relationship of the protection of the mountains to the protection of Santa Monica Bay is a key education objective for the park, as noted in the discussion on pages 51-53 in the Draft GMP.
8. This information, action, or recommendation has been considered. The GMP/DEIS text has been changed as follows: Figures 3 and 4 have been amended, as have pages 28 – 30 in the Draft GMP.

COMMENTS

RESPONSES

PACIFIC PALISADES RESIDENTS ASSOCIATION, INC.

POST OFFICE BOX 617
PACIFIC PALISADES
CALIFORNIA 90272
(310) 454-4254



March 6, 2001

Superintendent, Santa Monica Mountains NRA
401 West Hillcrest Drive
Thousand Oaks, California 91360.

Re: Comments on Draft GENERAL MANAGEMENT PLAN & ENVIRONMENTAL
IMPACT STATEMENT, Santa Monica Mountains National Recreation Area, California
Re: Trail Use By Bikers

1.

PPRA supports the Preferred Alternative with the exception of the provisions for biking. The GMP & EIS does not have a discussion of bicycles in the mountain that PPRA could find. At the February meeting in Santa Monica, someone stated that the discussion had been omitted. However, the topic was the one most commented on that hearing.

The idea that all trails are for mixed use unless otherwise signed is appalling. The opposite should be true. Bikers should be allowed only on those trails that are specifically signed, and those should be very limited. Bikers want it all and in future may want electric bikes on trails. The mountains should be a preserve for non-obtrusive uses that do no harm to others.

2.

Biking and hiking are not compatible uses. To paraphrase George Bernard Shaw when he spoke about smokers, hikers and bikers cannot be equally free on a mountain trail. Both are endangered by the mix, but most at risk are hikers. It is only a matter of time before more serious injuries occur and lawsuits result. Hikers are forced off the trails where bikers are allowed. One woman at the hearing said she stopped hiking at Will Rogers for fear of being run into. Certainly people with little children cannot have a carefree walk on trails where bikes are allowed.

Bikers at the hearing stated that they are so considerate of hikers and horses, but that was not the experience of the hikers at the hearing. I have seen bikers speeding around blind curves on asphalt fire trails and taking up the entire trail on unpaved ones. Narrow misses do not get reported and counted in accident statistics.

PPRA urges that all trails be off limits to bikers unless specifically signed and that major trails that offer a temptation to bikers who may not know or respect the limits be signed as off limits to bikes.

Yours for a peaceful Recreation Area,

Frances Shalant, Corresponding Secretary

1. These remarks speak to concerns more detailed than the scope of the General Management Plan. They will be used in the formulation of a Draft Trail Management Plan, expected for release sometime in late 2002 or early 2003.
2. These remarks speak to concerns more detailed than the scope of the General Management Plan. They will be used in the formulation of a Draft Trail Management Plan, expected for release sometime in late 2002 or early 2003.



palisades preservation association

May 30, 2001

Arthur E. Eck, Superintendent
 Santa Monica Mountains National Recreation Area
 401 West Hillcrest Drive
 Thousand Oaks, CA 91360

Re: Draft General Management Plan/ Environmental Impact Statement,
 Santa Monica Mountains National Recreation Area

Dear Superintendent Eck:

Because our community abuts part of the area that is covered by the Draft General Management Plan/ Environmental Impact Statement and our Association takes a great interest in preserving the recreational interest in the Area not only for the residents of our community but for all who live and visit in Los Angeles, we submit the following comments on the Draft General Management Plan/ Environmental Impact Statement.

1. First, let us say we favor a modified Preferred Alternative which restricts the use of mountain bikes to both paved and dirt roads in the Plan Area for the reasons stated herein and does not permit them on any dirt trail used by hikers or horse back riders. This Alternative is not discussed in the Plan/EIS but we think it should be considered. We do not think the problems that mountain bikers are causing is sufficiently addressed in the Plan/EIS. Perhaps the problem is not as significant as we constantly hear that it is but there is insufficient information in the Plan/EIS for a proper evaluation of the problem.

Second, there needs to be more information about riding horseback on the trails. Third, we feel the idea of the Marion Davies Home (415 Pacific Coast Highway) being included in the Plan Area is ludicrous. Fourth, we believe Los Liones Canyon State Park, a major trail head, should be identified both on the maps and in the text of the Plan/EIS. Fifth, we believe the Plan/EIS should include information regarding the amount of private lands that lie within the Plan Area are developed and undeveloped.

Inadequate Discussion of the Impact of the Use of Mountain Bikes in the Alternatives.

The reason is that the impact of the use of mountain bikes in the Area is never really discussed. It is set forth as a major issue on page 38 where it states that one of the two Visitor Experience Issues is:

- “• Conflicts among different recreational users, such as mountain bikers, horseback riders and hikers, detract from the quality of the SMMNRA experience.”

Then on page 41, the Issue is discussed in Visitor Experience Goals:

post office box 1256, pacific palisades, california 90272

1. This statement or opinion has been considered. No change has been made to the GMP/EIS. These remarks speak to concerns more detailed than the scope of the General Management Plan. They will be used in the formulation of a Draft Trail Management Plan, expected for release sometime in late 2002 or early 2003.

COMMENTS

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- Anticipate and manage potential conflicts among recreational uses. Appropriately enhance the visitor experience and provide a safe and conflict-free environment ”

2. The problem is that neither the Issue nor the Goal is further addressed in the Draft General Management Plan/ Environmental Impact Statement and they should be under the National Environmental Policy Act (NEPA). While the Visitor Experience is discussed within each Alternative, there is no mention of the extent of the impacts, if any, of the use of mountain bikes will have on visitors, particularly hikers. There is one sentence in the Preferred (p. 287), Preservation (p. 321) and the Education (p. 356) Alternatives which discuss multi-use trails in areas managed for moderate intensity. These sentences only state that any restrictions will have moderate adverse impacts on visitors who enjoy multi-use trails. But those brief statements do not discuss conflicts between types of users nor do they discuss the impacts on visitors in low and high intensity uses nor do they define which types of users will suffer adverse impacts.

3. Moreover, nothing at all relating to restrictions on the use of multi-use trails appears in either the Recreation and the No Alternatives. Nor does anything appear in the summaries of the Visitor Experience in Table 9 that relates to the extent of the impacts, if any, of mountain bikes on the Visitor Experience.

4. What is missing from the Plan/EIS is a discussion of the existing situation regarding the use of mountain bikes. There is no discussion of the extent of the use, of what conflicts are known are and have occurred, what environmental damage is and has resulted from the use of mountain bikes, if any, what steps are currently being used to prevent any such conflicts and environmental damage, and how effective have they been. There is no base line of information. Describing the existing environment, in particular focusing on resources and conditions in the human environment which will be affected by the proposed action or alternatives, is required. (40 CFR1502.15). Although the descriptions need not be any longer than is necessary to understand the effects of the alternatives, the problem in this Plan/EIS is that there is insufficient information to understand the effects of the alternatives.

What does occur is that the Plan/EIS just dismisses the mountain biking issue on page 94 where the Strategies Considered but Eliminated from Further Study are discussed. It is stated there:

- **“Prohibit mountain biking in the park.-**

None of the park agencies participating in the development of this plan believe that prohibiting mountain biking would be feasible or desirable. That is not to say that mountain bikes are inappropriate use in all areas, but a complete prohibition of their use would be equally unwarranted and ignores the interests of a large component of park users.”

5. The above comment misses the issue. The issue is not prohibiting the use of mountain bikes all together. The issue is to what extent they should be permitted and that is not sufficiently discussed. The Plan is very unclear as to where they will be permitted but it is

2. These issues are identified at a general level (page 38) in the GMP/EIS, commensurate with the detail level of the plan. Concerns about environmental impacts are addressed in various places in the final document. Efforts to resolve some of these conflicts will require proposals more detailed than the scope of the General Management Plan. The concerns expressed here will be used in the formulation of a Draft Trail Management Plan, expected for release sometime in late 2002 or early 2003.
3. These issues are identified at a general level (page 38) in the GMP/EIS, commensurate with the detail level of the plan. Concerns about environmental impacts are addressed in various places in the final document. Efforts to resolve some of these conflicts will require proposals more detailed than the scope of the General Management Plan. The concerns expressed here will be used in the formulation of a Draft Trail Management Plan, expected for release sometime in late 2002 or early 2003.
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5. certain that it proposes that mountain bikes be allowed on multi-use trails.

6. Based on many reports that we have heard we do know that there is a problem between bikers and hikers. As many testified during the hearings, that hikers are being driven off trails being used by the bikers. We have heard the same thing from numerous other hikers who did not attend the hearings. They report that bikers rarely yield to hikers forcing hikers off trails. Many hikers view bikers as the terrorists of the trails. Horseback riders do not like sharing trails with bikers because bikers coming down trails around a turn sometimes frighten their horses. Therefore, there is a strong possibility that multi-use trails will cease to be multi-use and used almost exclusively by the bikers.

7. How serious the problem will be if the proposed Plan is approved cannot be ascertained from the Plan/EIS. The maps provided for each Alternative only show one trail on land, the Backbone Trail, which is designated as a multi-use trail in each of the Alternatives.

The eastern terminus of the Backbone Trail is at Will Rogers State Park in the Pacific Palisades and because of its use by bikers, many hikers no longer use this trail which was a popular hiking trail for at least 40 years.

Lacking any mapping of the proposed multi-use trails, it is difficult to ascertain the impacts that will occur from the use of the trails by bikers. While the Recreation Alternative states that all trails would be multi-use, the Preferred, Education, and Preservation Alternatives simply state that "Only designated trails will be multi-use" but since there is no indication of what trails will be designated, the impacts cannot be ascertained.

The Plan/EIS does state on Table 7 at p.40 that mountain biking will be permitted in both Low and Medium Intensity areas on designated trails as part of the Visitor Experience. However, the map in Figure 6 for the Preferred Alternative indicates that almost all the Plan area is designated as Low and Medium Intensity Areas and Table 8 indicates that 80% will be designated Low Intensity and 15% will be designated as Medium Intensity which can be interpreted to mean that 95% of the Area will be open to mountain biking.

8. The problem is that there is insufficient data in the Plan/EIS to quantify the impacts. Unless they are quantified, the requirement that "Environmental impacts and values must be identified in adequate detail so they can be compared to economic and technical analyses" will not be satisfied" (40 CFR1501.2(b)).

There are obvious conflicts between what the Visitor Experience should be. In Visitor Experience Goals (p.46) it states that the goal is to:

- Create a seamless, enjoyable experience for visitors."

In Table 7, Actions Common to All Alternatives, "Visitor Experience & Activities for Low Intensity Areas." it states that the Visitor Experience should

- Allow quiet enjoyment of natural sights and sounds."

On page 52, it states:

6. These issues are identified at a general level (page 38) in the GMP/EIS, commensurate with the detail level of the plan. Concerns about environmental impacts are addressed in various places in the final document. Efforts to resolve some of these conflicts will require proposals more detailed than the scope of the General Management Plan. The concerns expressed here will be used in the formulation of a Draft Trail Management Plan, expected for release sometime in late 2002 or early 2003.

7. The park agencies of the Santa Monica Mountains are cognizant of the conflicts that exist among various groups of trail users. Between various policies, practices, and user interests stretched across a system of over 500 miles of interconnecting trails could lead in so many directions, a conscious decision was made to address these issues more precisely through a Trail Management Plan, thus freeing the public to engage in a discussion about other concerns pressing directly on the overall protection of Santa Monica Mountains.

8. Quantification of impacts due to a specific sector of the public is difficult. Resource monitoring to date has suggested that any impacts to the condition of the resources has not been directly attributable to the lawful use of trails by any specific group of users. The concerns expressed here will be used in the formulation of a Draft Trails Management Plan.

COMMENTS

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“The SMMNRA provides a diverse, pleasing, natural and cultural landscape where visitors can experience personal solitude, contemplation, and inspiration.”

One of the supposed benefits of the Preferred and Preservation Alternatives is that by increasing the percentage of low intensity use areas, these Alternatives will (pp. 288, 321):

“help ensure that visitors have the opportunity to experience the quiet and solitude.”

which “might result in a major beneficial effect for those that seek that kind of experience.”

One veteran hiker, who is a hike leader and also a biker, reported that once a biker whizzes by, that instead of enjoying the nature experience, hikers start concentrating on the trail and looking out for bikers so that they can get out of the way when the next biker comes down the trail.

9. For the most part hikers want to experience the solitude, the quiet, so that they enjoy the natural beauty of the mountains and when the opportunities present themselves, observe wildlife. This is unlikely to happen if bikers drive hikers off the trails. It doesn't happen when bikers whiz by, frightening away wildlife from the trails.

10. Bikers, as a rule, are not looking for the same experience as hikers. It is difficult to have that experience when the biker must concentrate on riding a bike with the eyes focused most of the time on the trail to enjoy much of what surrounds the biker. The biker has to stop to have that experience.

11. The best alternative is to separate the bikers from the hikers. This can be done by restricting mountain bikes to roads, paved and unpaved, which lace the Area. It is appropriate because mountain bikes are classified as vehicles. They are basically off-road vehicles and although they are not noisy and polluting like motor bikes, bikes are just as objectionable as motor bikes because of the damage that the wheels do to the trails and the adjacent areas. Although this adverse impact is not discussed in the Preferred Alternative nor is it mentioned in Table 9, Summary of Environmental Consequences and Mitigation Measures, there is ample evidence in the Plan/EIS that it is a significant impact.

In the discussion of the environmental consequences of the No Action Alternative, it states (p.251):

“Mountain bike riding could be moderately to highly destructive to cultural resources through the acceleration of erosion.”

In the analysis of the environmental consequences of the Recreational Alternative it states (p.378):

“Instituting multi-user trails would result in an increase in long-term moderate adverse impacts due to an increase in erosion of paleontologically sensitive sediments, relative to the no action alternative.”

9. These remarks speak to concerns more detailed than the scope of the General Management Plan. They will be used in the formulation of a Draft Trail Management Plan, expected for release sometime in late 2002 or early 2003.

10. These remarks speak to concerns more detailed than the scope of the General Management Plan. They will be used in the formulation of a Draft Trail Management Plan, expected for release sometime in late 2002 or early 2003.

11. These remarks speak to concerns more detailed than the scope of the General Management Plan. They will be used in the formulation of a Draft Trail Management Plan, expected for release sometime in late 2002 or early 2003.



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More damning is the statement on page 382 that:

“Multi-use trails would likely bring more people into the area, resulting in an increased rate of impacts to historic properties from trail construction and other ground disturbing activities. The impacts would also occur from the increased erosion, inadvertent damage, and vandalism. Trails that provide access to cultural landscapes, or components of cultural landscapes, could result in impacts that diminish the contributing values to the landscape...”

While the last two statements do not directly state that mountain bikes are the possible source of the damage, when connected to the first statement, the implication is that if mountain biking is permitted on a trail, significant adverse impacts will occur both physically and to the

12. visitor experience. No mitigation measures are set forth which would effectively counter the impacts caused by mountain bikes

13. Restricting the use of mountain bikes to roads in the Plan Area does not discriminate against mountain bikers. Mountain bikers can still enjoy the same experience as everyone else who does not use a bike. The restrictions only equalize the opportunities for everyone. While bikers may argue that they also are visitors and should be treated like all other visitors, they should be granted their wish, to visit the Plan Area without bicycles unless they use on roads for regular vehicles

Nor do the restrictions affect a significant number of users. They do not comprise “a large component of park users” as stated on page 94. They are at best a small minority of park users but because bikers can and do travel much longer distances and travel them much faster than hikers and horse riders, the adverse impacts they cause are much greater than that of hikers and horse riders.

Because one biker traveling on a trail will be observed by far more hikers than would a hiker traveling it could be perceived that they are a larger component than they actually are. Moreover, that perception may also exist because bikers are a much more visible and vociferous group. Manufacturers and retailers of mountain bikes have a large financial stake in selling their bikes and spend large sums attempting to influence decisions by public bodies regarding the use of mountain bikes. As part of that effort the mountain bike lobby has formed and financed organizations of mountain bikers to carry their message ensuring that mountain bikers are all ways well represented at any public hearing which may affect the use of mountain bikes.

These organizations usually represent that they represent most mountain bikers. While many mountain bikers may agree with the views expressed by these organizations, the fact is that most mountain bikers do not belong to any organization, much less even know about them.

It is a common practice in industries which are concerned about any restrictions on their markets. While there are many bikers who are responsible riders and follow the rules, particularly those who do belong to organizations, the problem is that they are a distinct minority. Most bikers are rogue riders that do not belong to any organization and who do and will treat every trail as a bike trail regardless whether or not it is designated for use by bikers.

12. Comments addressed, see pages 94 and 173-175. More specific exploration of this concern will occur as part of the Trail Management Plan.

13. This statement or opinion has been considered. No change has been made to the GMP/EIS. The NPS welcomes the continuing involvement of the public in the management of the SMMNRA and appreciates the thoughtful and committed input received on the GMP/EIS.

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14. The bike industry response to this is pretty much the same as other industries have responded such as the leaf blower, gun, and snowmobile industries have responded to proposed restrictions, and that is that the solution is to educate users. The problem is those educating users is an almost impossible task and it depends on the willingness of bikers to be educated and then obey the rules. The biker population constantly changes.

14. This statement or opinion has been considered. No change has been made to the GMP/EIS. The NPS welcomes the continuing involvement of the public in the management of the SMMNRA and appreciates the thoughtful and committed input received on the GMP/EIS.

15. It has been suggested that bikers who want to use trails in the Area be licensed, with the requirement that they pass a test before being granted a license. Other bikers argue that this would be discriminatory because there is no requirement that hikers or horse riders be licensed. Nevertheless, a licensing program would be expensive for the involved agencies and the fees charged would have to cover those costs. And because bikers are a distinct class of Park users, they can be legally required to have a license, particularly if it is shown that they pose more of a threat to other users and cause more damage.

15. These remarks speak to concerns more detailed than the scope of the General Management Plan. They will be used in the formulation of a Draft Trail Management Plan, expected for release sometime in late 2002 or early 2003.

16. In the end, if mountain bikes are allowed to be used on the trails, it may well turn out that they will be the major users of the Plan Area because they will have driven all but the hardest of hikers off the trails as they are doing now, particularly with older hikers.

16. This statement or opinion has been considered. No change has been made to the GMP/EIS. The NPS welcomes the continuing involvement of the public in the management of the SMMNRA and appreciates the thoughtful and committed input received on the GMP/EIS.

That would be a tragedy. There have been hikers in the Santa Monica Mountains since man first came to California. There have been horse riders in the mountains since the Spanish first came here in the 17th Century. The mountains were one big cattle ranch. The mountain bikers are very late arrivals. They should not be allowed to damage or destroy an experience enjoyed by so many for hundreds of years.

17. These remarks speak to concerns more detailed than the scope of the General Management Plan. They will be used in the formulation of a Draft Trail Management Plan, expected for release sometime in late 2002 or early 2003.

17. By restricting bikes to roads will make it much easier to enforce restrictions on the use of trails by bikers, particularly considering the shortage of rangers necessary to do the enforcing. In order to encourage the use of bicycles as a means of transportation to the mountains, bike racks should be installed at trail heads so that the bikers can leave their bikes at the trail heads and enjoy the same experience all others enjoy on their mountain hikes.

18. These remarks speak to concerns more detailed than the scope of the General Management Plan. They will be used in the formulation of a Draft Trail Management Plan, expected for release sometime in late 2002 or early 2003.

Horseback Use of Trails.

As stated previously, horses are very much a part of the Plan Area. While ranching was the source of early use of the Plan area, ranching has been supplanted with recreational riding. Since the late 1920's many estates and homes with stables, stables, and riding clubs have been established in and on the periphery of the Plan Area. Riders from these commonly use the Plan Area for recreational riding.

19. These issues are identified at a general level (page 38) in the GMP/EIS, commensurate with the detail level of the plan. Efforts to resolve some of these conflicts will require proposals more detailed than the scope of the General Management Plan. The concerns expressed here will be used in the formulation of a Draft Trail Management Plan, expected for release sometime in late 2002 or early 2003.

Recreational riding has presented only minor conflicts between hikers and horse riders. Horse riders very rarely ride their horses at more than a walk. The major complaint hikers have is with the horse droppings on the trails.

18. Many homes and estates that have stables have established trails from their properties into the mountains. While most of these trails are inaccessible to the public, some are. This creates a problem with the term "multi-use." If those trails which connect to public trails are not designated as "multi-use", then these trails will not be open to horse riders even though horse riders in many cases established these trails.

19. This problem is not addressed in the Plan/EIS and should be. Perhaps an additional trail



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19. designation needs to be created such as "hiker/horse trails."

415 PCH, Marion Davies Home.

20. There is a problem with including the Marion Davies Home at 415 Pacific Coast Highway in Santa Monica in the General Management Plan. Santa Monica is remote from the Santa Monica Mountains. It has no frontage on the mountains. Santa Monica Beach is as relevant a beach to the Santa Monica Mountains as is Venice Beach or Manhattan Beach. It is not a contiguous recreational resource for users of the Santa Monica Mountains. Many consider the Marion Davies home a white elephant which interferes with the view of the ocean and should be leveled and made into a parking lot to accommodate beach users.

It seems that the only reason it is included in the Plan is to qualify it for funding out of National Park funds. That means that any funding would be at the expense of other projects in the Plan Area.

Los Liones Canyon State Park.

21. Los Liones Canyon State Park is a major trail head leading into Topanga State Park. While it is shown on the Alternative Maps it is not identified. More crucially, it is not identified either on Figure 3, Current Park Ownership, or Figure 4, Existing Conditions & Recreational Opportunities, or described in the inventory of California State Parks on pages 28-30.

Conclusion.

We appreciate the opportunity to submit our comments and we hope they will be of value to the Park Service. We look forward to the responses to these Comments.

Sincerely yours,


JACK ALLEN, President

20. This statement or opinion has been considered. No change has been made to the GMP/EIS. The NPS welcomes the continuing involvement of the public in the management of the SMMNRA and appreciates the thoughtful and committed input received on the GMP/EIS. Notwithstanding this commenter's concern, the national recreation area includes the beaches in the city of Santa Monica. From the standpoint of recreationists who come to the park, the level of use is upwards from 20 times greater than those in the mountains. Understanding the relationship of the protection of the mountains to the protection of Santa Monica Bay is a key education objective for the park, as noted in the discussion on pages 51-53.

21. This information has been considered. Appropriate modifications have been made to the text and Figures 3 and 4.

COMMENTS

RESPONSES



P.O. Box 245
Agoura Hills, CA 91375
Phone 818 991 1236
Fax 818 889 4540
www.gotorec.org

May 30, 2001



CERTIFIED MAIL
RETURN RECEIPT REQUESTED

National Park Service
401 West Hillcrest Drive
Thousand Oaks, California 91360

Dear National Park Service

The Recreation & Equestrian Coalition (REC) was formed to promote, protect, and expand the recreation opportunities available throughout Los Angeles County. REC represents the interests of over 10,000 outdoor and equestrian enthusiasts. We have joined with other outdoor organizations in presenting this letter to express our grave concerns about the reduced public access and the limited vision being proposed by the Draft General Management Plan (GMP) & Environmental Impact Statement (EIS) proposed for the Santa Monica Mountains National Recreation Area (SMMNRA)

The SMMNRA was formed in 1978 with broad community support for creating an easily accessible recreation area for the millions of Southern Californians who live within easy driving distance of this magnificent open space. The American taxpayers have invested over \$200 million to create the SMMNRA by purchasing some of the most expensive real estate in the nation. Yet we have been handed a proposed 20-year plan, which would make most of the area off limits to the general public by reducing use and unrealistically constraining visits to the NRA.

1. We are particularly disturbed that the plan does not even mention that over 54% of the SMMNRA is in private ownership and will probably remain so. Such circumstances require special creativity and planning to accommodate visitors and provide a meaningful outdoor experience, particularly when most of the current visitor services and facilities such as restaurants, horse stables, camps, fishing, picnic facilities, conference facilities are operated by private business on private property. Certainly these facilities will continue to attract visitors to the NRA even as the GMP attempts to suppress access and usage. These private facilities probably attract at least as many visitors as the 900,000 annual reported visitors claimed by the Park Service
2. The plan unrealistically assumes that visitor use of the National **Recreation** (emphasis added) Area can actually be reduced, and that current "intensities of use" can somehow be lowered. Visitor counts have been increasing at the rate of 12% per year, and with an anticipated increase of 5 million in our region's population we view these goals as rather unrealistic.

1. This information, action, or recommendation has been considered. The description of the affected environment contained in the DEIS has been modified. The National Park Service agrees that the private sector plays a critical role in offering direct and indirect recreational services in the Santa Monica Mountains. Moreover, it is Service policy to encourage the development of private recreation services for the general public when and as appropriate, rather than compete with them. Therefore, a Mission Goal, under the Visitor Experience section beginning on page 41, has been added to ensure that this principle is prominently reflected in park planning and policies. Additional information concerning the current role played by private recreation vendors has been incorporated in the descriptive text of the GMP where pertinent.
2. The plan does not propose limiting recreation access, only preserving the quality of visitor experience. The plan clearly seeks to facilitate broader access to recreational opportunities in the park by such means as trail system improvements that would be considered in more detail in the Trail Management Plan, new visitor centers, outreach facilities and better transportation systems, such as shuttles.



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- 3. The cumulative impact analysis contained in the EIS fails to account for the likely impacts of diverting visitors to other recreation facilities as a result of the "limited use" alternative proposed. The impact of reducing use at over 70% of the visitor sites will require significant enforcement manpower, as well as the redirection of visitors to other areas, which will certainly aggravate traffic and air quality in the region and negatively impact the quality of the visitors' experiences.
- 4. The Plan has disproportionate priority on movie production, which is a high impact activity. Filming restricts public use of the publicly owned lands. The public is generally kept away from such activity, and shooting schedules can often go on for days or even weeks.
- 5. Finally, the plan fails to fulfill the promise made to the public and taxpayers to create a National **Recreation Area** (emphasis added) in the Santa Monica Mountains. Certainly there are some scenic vistas and wilderness areas that should be protected from degradation. However, the public was promised an extensive and diverse recreation showcase that has so far, failed to appear

Attached are some of the inadequacies and shortcomings in the GMP and the EIS. Prior to final decision on the GMP and EIS, we would like to see these matters addressed in appropriate modifications, including further public input.

As advocates for responsible public use of public lands, we want to express our profound disappointment with the lack of vision presented by the draft plan. Surely, you can do much better for the benefit of the public in this great land of opportunity. The public deserves more than a cookie-cutter, look-but-don't-touch plan by the National Park Service. This very unique NRA begs for a unique vision to match its unique character and location.

We are eager to assist in the considerable work necessary to redraft this document into a realistic, visionary plan, and we are willing to take the time and energy required to do it right! We hope that you will please give us the opportunity.

Sincerely,

Ruth Gerson,
 President

RG/cts
 Enclosures
 REC1021.doc

- 3. The plan does not propose limiting recreation access, only preserving the quality of visitor experience. The plan clearly seeks to facilitate broader access to recreational opportunities in the park by such means as trail system improvements that would be considered in more detail in the Trail Management Plan, new visitor centers, outreach facilities and better transportation systems, such as shuttles.
- 4. As a point of clarification, while filming on NPS lands under special use permit is encouraged as part of the cultural history of the Santa Monica Mountains, public access to the set is a prerequisite of the grant.
- 5. This statement or opinion has been considered. No change has been made to the GMP/EIS. The NPS welcomes the continuing involvement of the public in the management of the SMMNRA and appreciates the thoughtful and committed input received on the GMP/EIS.

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**RECREATION AND EQUESTRIAN COALITION
COMMENTS
SANTA MONICA MOUNTAINS NATIONAL RECREATION AREA
GENERAL MANAGEMENT PLAN
MAY 2001**

1. 1. The plan proposes an inappropriate low level of intensity for an urban recreation area.
 - a. The plan inaccurately assumes that recreation should be treated as an alternative. This is a National RECREATION Area and optimum recreation should be the basis of every alternative.
 - b. The plan needs to include a capital improvement plan for parking lots, trailheads, campgrounds, trails and public facilities.
 - c. There should be a central visitor center inside the NRA. The small remote visitor center locations can only provide "virtual" experiences.
 - d. The plan overstates the availability of some publicly owned lands for recreation. Water District and Sanitation District lands are not accessible to the public.
2. 2. The plan fails to account for the private land ownership within the recreation area and completely overlooks the contribution made by privately owned visitor-serving facilities.
 - a. The Park Service should conduct a survey of all the private facilities to determine the number of annual visitors each serves, and the long-range expansion plans for each of these facilities. It would reflect a better picture of the future use of the NRA.
 - b. The Plan fails to consider recent changes in local ordinances and plans, which will generate more equestrian and vineyard activity in the NRA, and consequently more visitors to these privately owned facilities.
 - c. The 1997 mission statement on page 43 omits any reference to public/private partnerships in the stewardship of the NRA.
 - d. As long as 53% of the land in the NRA remains privately held it will effect the development of the NRA and the visitor experience. The plan does not deal with this symbiotic relationship.
3. 3. The Plan ignores the acknowledged future demand for use of the recreation area.
 - a. Visitor counts to the interior of the NRA have been increasing at the rate of 12% per year. The proposed alternative ignores this and proposes no effort to accommodate the demand.
 - b. The plan emphasizes the 32 million visitors who visit the beach, as if they were also visitors to the National Recreation Area. This distorts the real usage. The plan should reflect the needs of the 900,000 people who actually visit the interior of the recreation area. It should also reflect the needs of almost one million annual visitors to the private recreation facilities. Not one single area of the NRA is proposed for an increase in visitors

1. It is important that reviewers not confuse the concept of "low intensity areas" as a desired experience for visitors, with actual limits on users. The latter issue is addressed on page 173. For the present, the park agencies see no need to limit recreation use in the park. With respect to non-recreational lands, the past practice used by park agencies in the Santa Monica Mountains that recognizes the public value of open space lands managed for other than recreational purposes will continue. In many instances, the administering agencies of these lands have proven invaluable partners in meeting mutual public goals of conservation, while providing for national defense, drinking water, public sanitation, etc.
2. The National Park Service agrees that the private sector plays a critical role in offering direct and indirect recreational services in the Santa Monica Mountains. Moreover, it is Service policy to encourage the development of private recreation services for the general public when and as appropriate, rather than compete with them. Therefore, a Mission Goal, under the Visitor Experience section beginning on page 41, has been added to ensure that this principle is prominently reflected in park planning and policies. Additional information concerning the current role played by private recreation vendors has been incorporated in the descriptive text of the GMP where pertinent. The plan has been updated to reflect new planning initiatives, principally the North Area Plan of Los Angeles County. Please refer to the Mission Statement presented on page 33.
3. The plan does not propose limiting recreation access, only preserving the quality of visitor experience. The plan clearly seeks to facilitate broader access to recreational opportunities in the park by such means as new visitor centers, outreach facilities and better transportation systems, such as shuttles. With respect to visitation, the number cited in the plan reflects reported levels of recreational activity within the legislated boundaries of SMMNRA. They do not represent visitation levels for any one agency but do represent the public constituency that the plan seeks to serve. The National Park Service does not use this number in its annual submission of information on SMMNRA to Congress. Both the preferred and the recreation alternatives have been



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- 3.
 - c. The plan should examine where more areas could be opened to public use, rather than making more areas off limits to the public.
 - d. The plan contains no counts for the number of visitors who ride horses, use mountain bikes, hike or camp over night.
 - e. The plan does not propose any future land acquisitions for recreation in the NRA, even though it proposes expanding the boundaries of the NRA.
 - f. The plan makes no effort to develop an alternative that would realistically accommodate anticipated increases in annual visitors.
 - g. There is no provision to have at least one equestrian campground in 150,000 acres of recreation land use. This was promised over 20 years ago.
- 4. The "preferred alternative" is inadequate and cannot be reasonably implemented.
- 4.
 - a. Reducing visitor usage at today's most popular sites is not realistic without considerably increased law enforcement. Reducing 70% of the area, which currently enjoys moderate or high intensity use, to less than 20%, simply cannot be done.
- 5.
 - b. Reducing street parking on PCH ignores the overwhelming need for public beach access, and since none of the beaches are operated or owned by the Park Service, appears to be beyond the scope of the Plan.
- 6.
 - c. If the new goal is to reduce the public usage at those locations now owned by the NPS, why were they purchased with Public dollars in the first place?
- 7.
 - 5. The cumulative impact analysis is inadequate.
 - a. Reducing the number of visitors will cause them to be diverted to other recreation areas. Those impacts are not addressed in the EIS.
 - b. Because much of the visitor serving commercial activities are privately owned, the negative economic impacts of reduced visitor counts should be addressed.
 - c. The EIS should address the preferred alternative's denial of "equal access" to minorities and inner city residents as a result of the reduced visitor opportunities.
 - d. The EIS does not address the problem of traffic delays as a result of the proposed increase in slow moving buses on mountain roads.
 - e. The EIS does not consider the significant traffic impacts to Las Virgenes Road, Malibu Canyon Road, and Mulholland Highway if a visitor center is located at the Gillette Ranch.
 - f. The document includes too many subjective and undefined terms such as intensity, carrying capacity, compatible recreation, harmonious development, and non-compatible human activity
 - g. The Plan lacks specifics on the public participation process. There are no numbers on the actual participation in the plan development process nor the specific comments made by those participants

- amended to include the overnight trail camps proposed in the Santa Monica Mountains Area Recreational Trails Coordination Project Report. The precise implementation of the camps will be established in specific development plans that are beyond the scope of this document in detail. The description of the affected environment contained in the DEIS has been modified.
- 4. The plan does not propose limiting recreation access, only preserving the quality of visitor experience. The plan clearly seeks to facilitate broader access to recreational opportunities in the park by such means as new visitor centers, outreach facilities and better transportation systems, such as shuttles.
- 5. This information, action, or recommendation has been considered. No change has been made in the GMP/EIS.
- 6. The public is encouraged to read the enabling legislation that created SMMNRA, which is presented on page 419 of the GMP/EIS, and consider how that relates the mission statement for the plan set out on page 33. The law sets forth a broader set of legal mandates than perhaps the name implies. Having said that, it should be noted that providing recreation is a mission goal for the plan and that all alternatives seek to fulfill that obligation, including both the Preferred and the Recreation Alternatives.
- 7. This information, action, or recommendation has been considered. The analysis of environmental consequences contained in the DEIS has been modified as appropriate. The plan does not propose limiting recreation access, only preserving the quality of visitor experience. The plan clearly seeks to facilitate broader access to recreational opportunities in the park by such means as new visitor centers, outreach facilities and better transportation systems, such as shuttles. None of the alternatives propose the conversion of Gillette Ranch to a visitor center. The facility would be used as a joint administrative center for state and national parks, and to provide support for environmental education programs. The public participation process is explained in pages 11-13 of the GMP/EIS.

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8. 6 The Plan has conflicting priorities and statements.
- a. Movie production is a high impact activity. Filming removes the most accessible areas from public use. Nighttime activities conflict with the Plan’s stated intent to provide solitude.
 - b. The plan does not “offer compatible recreation and education opportunities that are accessible to a diverse public,” as stated in its Mission.
 - c. The plan proposes to “protect” sensitive areas by isolating them from human contact. This is not appropriate for the recreation area.
 - d. The proposal to “Discourage the use of public funds for the rebuilding of public and private facilities destroyed by natural processes in zones of high hazard,” conflicts with the goal of accommodating visitors to the NRA.
 - e. The proposal to “limit the expansion of roadways within the SMMNRA” conflicts with “improving the visitor experience.”
 - f. The use of gravel or compacted gravel for trails is dangerous and completely unacceptable.
 - g. Designating vast areas of the NRA as “preserve” is unacceptable and circumvents the appropriate process for making such a determination. It conflicts with the Recreation nature of the region.
 - h. Solitude is given too high a priority given the urban nature of the park and the easy access to it from unlimited points along its borders.
 - i. There is no effort by the plan to restore the cultural landscape activities of ranching and agriculture where they can be enjoyed in their historic context.
 - j. The goal of preserving natural erosion is unrealistic and anti-public use, especially where trails, camps, parking and other facilities need to be maintained.
 - k. The plan appears to only encourage day use in the NRA, and discourages overnight uses.
 - l. The plan does not seem to account for the possible changes and conflicts which may be created by the soon to be released Local Coastal Plan being prepared by the County and the Coastal Commission.
 - m. The Plan conflicts with the recent changes made in the fuel modification requirements by the County which requires greater brush clearing than the Plan proposes.
9. 7. The vision for the Santa Monica Mountains proposed by this plan contradicts the promises made to the public when the NRA was created.
- a. The plan fails to recognize the historic uses which existed in the NRA, particularly those which are equestrian and agricultural in nature. It does nothing to assure the cultural heritage of the region and promote these historic activities.

8. This information, action, or recommendation has been considered. This important planning component for the SMMNRA is too detailed or site-specific to be addressed in the GMP. However, your comments will be retained for use in future planning efforts. Management guidance for this component will be developed later, at a finer scale, in an implementation plan providing more detail than the GMP. As a point of clarification, while filming on NPS lands under special use permit is encouraged as part of the cultural history of the Santa Monica Mountains, public access to the set during filming is a prerequisite condition for granting the permit.
9. The public is encouraged to read the enabling legislation that created SMMNRA, which is presented on page 419 of the GMP/EIS, and consider how that relates the mission statement for the plan set out on page 33. The law sets forth a broader set of legal mandates than perhaps the name implies. Having said that, it should be noted that providing recreation is a mission goal for the plan and that all alternatives seek to fulfill that obligation, including both the Preferred and the Recreation Alternatives. It should also be noted that there are a number of references in the GMP/EIS to the historic ranches located throughout the Santa Monica Mountains. Many of these require further study and more detailed plans for protection, as indicated on page 171 of the document. Beginning on page 431 is a more detailed outline of planned research to document and preserve historic and cultural uses associated with the mountains, including ranching.



COMMENTS

RESPONSES

SANTA MONICA MOUNTAINS INHOLDERS ASSOCIATION

May 24, 2001

HAND DELIVERED
AND U.S. MAIL

Mr Arthur Eck
National Park Service
401 West Hillcrest Drive
Thousand Oaks, California 91360

Re Draft General Management Plan for
Santa Monica Mountains National Recreation Area

Dear Mr. Eck:

Pursuant to your request that I document my concerns regarding the 2001 General Management Plan for the Santa Monica Mountains ("GMP"); I hereby submit the following comments. As I indicated in my testimony at the first hearing open for public comment on February 5, 2001, the Plan seems to have abandoned the spirit by which it was conceived. The original General Management Plan, which was ratified by Congress in 1982, was based on the idea that the National Park Service ("NPS") and the private landowner were forming a partnership by which they would work together to create a National Recreation Area for the mutual benefit of the public and the private landowner. The general concepts which compelled the landowner to support the Santa Monica Mountains National Recreation Area ("SMMNRA") are all but abandoned in the 2001 version. Not once are public private partnerships mentioned in the 2001 Plan. The 1982 Plan not only mentions the importance of public private partnerships, it goes as far as to encourage the private landowner to provide the visitor serving commercial infrastructure in order to defer the costs of providing the recreational facilities needed for the SMMNRA from the public.

1.

On page 31 of the 1982 Plan it discusses how one possible result, from education and working together with landowners on particular parcels, could in fact, result in a determination that acquisition of that parcel is not necessary. This type of statement gave landowners the idea that by providing valuable assets to the SMMNRA, they would be a welcome neighbor. Somehow that concept has changed over the last 19 years and the NPS lacks any need for the landowner, except to collect taxes from him to fund his own demise.

Santa Monica Mountains Inholders Association
26500 West Agoura Road, Box 457, Calabasas, CA 91302
(818) 880-8952 • Fax (818) 880-8977

1. This information, action, or recommendation has been considered. The National Park Service agrees that the private sector plays a critical role in offering direct and indirect recreational services in the Santa Monica Mountains. Moreover, it is Service policy to encourage private recreation services when and as appropriate, rather than compete with them. Therefore, a Mission Goal, under the Visitor Experience section beginning on page 41, has been added to ensure that this principle is prominently reflected in park planning and policies. Additional information concerning the current role played by private recreation vendors has been incorporated in the descriptive text of the GMP where pertinent.

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2. The Draft GMP seems to have deleted the entire section from the 1982 Plan titled "Private Enterprise". This section, which begins on page 32, provided the encouragement necessary to garner the support of the landowners. Each landowner relied upon the integrity of its government to make good on the promise it made to landowners, WE WANT TO BE PARTNERS. It seems by the flat omission of this section in the 2001 Plan that the NPS either never had any intention of keeping its' promise, or has now decided to renege on its prior promise.

The landowners who have formed the Santa Monica Mountains Inholders Association ("Inholders") feel that the 1982 Plan was a contract between the NPS and the landowners. We are saddened that the government, which we so willingly serve, could be so self-serving. We implore you to revisit the 1982 Plan and incorporate into the new Plan the spirit of that which you once promised.

We must all remember that this is a National Recreation Area not a preserve. Millions of tax dollars have been spent to provide our overburdened citizens a place to recreate. These goals cannot be accomplished when the NPS allows its' staff to:

- lead organized opposition to projects on private property;
- designate all privately owned land as light recreation regardless of the infrastructure, which may already exist, on a property;
- make no allowance for future visitor serving needs even though they know visitor counts are increasing by 12% per year;
- speak in favor of the RR-L Ordinance, which would have limited the horses allowed in NRA;
- support the Woodlands Ordinance, which would have made it practically impossible to use property for almost any purpose if it was within five feet of the canopy of two trees.

As difficult as it is to believe that the NPS could support such policies in the Draft GMP or advocate such positions with other public agencies, the most incredible statement was made at a hearing by an NPS employee, on a proposal before the Planning commission to grant a permit to build four houses on four legal parcels. The NPS proposed that only one home be allowed and that a condition be imposed that if it ever burned down, was flooded out, or destroyed by natural disaster, the home would never be permitted to be rebuilt.

2. This information, action, or recommendation has been considered. The National Park Service agrees that the private sector plays a critical role in offering direct and indirect recreational services in the Santa Monica Mountains. Moreover, it is Service policy to encourage private recreation services when and as appropriate, rather than compete with them. Therefore, a Mission Goal, under the Visitor Experience section beginning on page 41, has been added to ensure that this principle is prominently reflected in park planning and policies. Additional information concerning the current role played by private recreation vendors has been incorporated in the descriptive text of the GMP where pertinent.



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National Park Service
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Page Three

The NPS staff testifying at hearings, and acting in such an inappropriate manner throughout the community, I think it is easy to understand that the Inholders are less than enthusiastic about the missing elements in the Draft GMP. We wish to see these missing elements in the Plan.

We once again request that you read the 1982 Plan and incorporate the promises you once made, or leave the 1982 Plan as is and discard the 2001 Plan.

Sincerely,

Brian Boudreau
President

BB

cc: Gale A. Norton, Secretary of the Interior

COMMENTS

RESPONSES

*santa monica mountains
task force/sierra club
angeles chapter*



Box 344 • Woodland Hills, California 91365-0344

April 17, 2001

Art Eck, Superintendent, SMMNRA
1101 West Hillcrest Drive
Thousand Oaks, CA 91360

The Santa Monica Mountains Task Force of the Sierra Club, which has a long history of working on environmental protection, resource preservation and land acquisition priorities in the Santa Monica Mountains National Recreation Area, offers the following comments and suggestions regarding the 2000 Draft General Management Plan.

We support the **Preferred Use Plan**, with some comments and qualifications.

Resource Management: We support the proposal to reintroduce steelhead into Solstice Canyon and that the existing small steelhead populations in Arroyo Sequit and Malibu Canyon be protected and enhanced. We support the protection of all wildlife corridors and the protection and restoration of watershed and marine-interface zones.

1. **Visitor Experience:** We strongly support emphasis on resource compatible recreation, such as hiking, walking, bird watching, flora and wildlife observation. A major emphasis should be put on environmental education, and we encourage locations such as a primitive overnight education camp at Circle X, an environmental education camp at Solstice Cyn, and an overnight education camp in Lower Corral Canyon. We advocate an increase in trail camps, especially along the Backbone Trail, as long as such facilities are compatible with protecting the resources of the park.
The coastal boat tour is a good and creative plan, especially if it includes the impressive undeveloped coastline west of Leo Carrillo.
2. The **Preferred Alternative Plan** states that "only designated trails would be multi-use." The SMMTF supports the use of fire-roads for multi-use activities. We have long advocated that narrow trails and pathways throughout the SMMNRA be restricted to those on foot and (with some exceptions) those on horses. Mountain bikes are machines that negatively impact the environment, the visitor experience and the safety of other trail users. We also propose reduction of bicycle speeds (especially in high-density areas); greatly increased signage on trails; and stronger enforcement of penalties for mountain bikers who ride illegally, speed excessively and behave recklessly, to the endangerment of themselves and other park users.
3. **Facility Development:** As mentioned, we support all the suggestions for increased visitor, environmental and education centers. Visitor information centers at El Pueblo and LAX would become important "outreach" facilities. The SMMNRA might consider moving its headquarters and visitor center to a more central and accessible location.

1. This information, action, or recommendation has been considered. Both the preferred and the recreation alternatives have been amended to include the overnight trail camps proposed in the Santa Monica Mountains Area Recreational Trails Coordination Project Report. The precise implementation of the camps will be established in specific development plans that are beyond the scope of this document in detail. Similarly, environmental education facilities will be evaluated on a site-specific basis in more detailed plans at a future point.
2. These remarks speak to concerns more detailed than the scope of the General Management Plan. They will be used in the formulation of a Draft Trail Management Plan, expected for release sometime in late 2002 or early 2003.
3. This statement or opinion has been considered, which is consistent with the Gillette Ranch element of the preferred alternative. The NPS welcomes the continuing involvement of the public in the management of the SMMNRA and appreciates the thoughtful and committed input received on the GMP/EIS.

Consultation and Coordination
Comments and Responses - Organizations



COMMENTS

RESPONSES

santa monica mountains
task force/sierra club
angeles chapter



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-2-

4.

Management Activities: We generally support land acquisition and boundary studies. FEMA should purchase properties with a history of repeated disaster losses; however, many of these properties may not have high park potential nor reasonable access.

Liberty Cyn wildlife corridor, upper Los Virgenes Cyn and the Serrania Park/Avatar Area and Caballero Cyn north of Dirt Mulholland should be purchased for the SMMNRA, and other areas, such as Ladyface and Triunfo Cyn, should be considered. Mulholland should be protected as a scenic corridor, but other important roads that should have scenic protection include Las Virgenes, Corral and Pioma Canyons.

We support improved public transportation to the mountains, but such plans need careful consideration to ensure that they are feasible, practical and workable.

Submitted by Mary Ann Webster, Chair, SMMTF

Phone: 310 559-3126. Fax: (310) 559-3136. E.mail: jasmin1931@aol.com

4. This information, action, or recommendation has been considered. These recommendations are generally consistent with existing land protection plans adopted by the National Park Service and/or the Santa Monica Mountains Conservancy, as well as the general goals and objectives of the GMP. This statement or opinion has been considered.

COMMENTS

RESPONSES

**SANTA MONICA MOUNTAINS
TRAILS COUNCIL**



PO BOX 345 AGOURA HILLS, CA 91376 (818)222-4531 SMMTC@YAHOO.COM



May 28, 2001

Mr. Art Eck, Superintendent
SMMNRA
401 W Hillcrest Drive
Thousand Oaks, CA 91360

Reference: DRAFT GENERAL MANAGEMENT PLAN 12/2000

Dear Supervisor Eck,

Following is our board's response to the Draft General Management Plan for SMMNRA. We favor expansion of the park boundary and conservation of the natural resources therein, with strong emphasis on recreation and on better access for the public. Other issues that we have comments on include public facilities, equestrian facilities, historic and cultural values, Backbone Trail, and visitor centers.

1. The Backbone Trail (BBT) is of itself a linear park. Due to its significance, it should have a separate section in the GMP. The plan should state that the BBT will be finished, with water and trail camps about 6 miles apart, and feeder trails established so that people can access the BBT from various areas and communities.
2. The Coastal Slope Trail should be completed. We support the Anza National Historic Trail, and some of our members participate in the annual community celebration.
3. There is insufficient recreation in this Plan, and there is insufficient access for the public. People must have access to the public parklands in order for them to care and to vote for supporting funds. Access should be reasonable without degrading the environment. The recreation that we support is called passive recreation, and it is defined to include horseback riding, hiking and mountain biking. Passive recreation is very compatible with the environment. We promote responsible recreational use, and we recommend educational programs to teach the public about the outdoors.

1. This information, action, or recommendation has been considered. Both the preferred and the recreation alternatives have been amended to include the overnight trail camps proposed in the Santa Monica Mountains Area Recreational Trails Coordination Project Report. The precise implementation of the camps will be established in specific development plans that are beyond the scope of this document in detail. The description of the affected environment contained in the DEIS has been modified.
2. These remarks speak to concerns more detailed than the scope of the General Management Plan. They will be used in the formulation of a Draft Trail Management Plan, expected for release sometime in late 2002 or early 2003.
3. These comments are consistent with the mission goals and preferred alternative of the Draft General Management Plan (pages 41 and 49).



COMMENTS

RESPONSES

SMMNRA Draft GMP – Comments from SMMTC
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 Page 2

Recreational facilities that are visitor serving should be included and expanded upon, such as trails, trailheads, trail camps, drive-in campgrounds, parking, and restrooms. We do not feel that trails which cross or parallel riparian areas will negatively impact mountain lions and katyids at all, refer to page 241

4. A major trailhead staging area, unpaved, is needed at the north end of Las Virgenes Road in the Ahmanson Open Space location. Trail camps should be spaced approximately 6 miles apart on the Backbone Trail and the Coastal Slope Trail. Campgrounds should not be limited, and in fact, their numbers should be increased in order to provide visitors with the outdoor, overnight experience they seek. Circle X Ranch, located on the BBT, should have individual trail camp sites to accommodate hiking and equestrian use, a car camp for families, as well as a group camp. We recommend that Camp Allen be re-opened for individual and group use. Both Corral Canyon and Decker Canyon should also be for overnight camping, not just for “education” camping sites.
6. The Plan should include trails and boardwalks into Navy lands at Point Mugu. The lagoon there should allow paddle-powered crafts (kayaks, etc.). A landing should be opened for these boats in an appropriate area.
7. Paving the parking lots cheats the visitor of the parkland experience. Natural soil should be part of the natural experience in nature. Trailhead parking also should not be paved or gravel. (Decomposed granite is good.) More parking overlooks should be developed along Mulholland Hwy; to provide stopping places for enjoying the views, as the Conservancy has done in several places already.
8. A major visitor center is needed within the mountains, not at the outside perimeter. Tapia Park would be an excellent location since it is accessible by car, bus and trail. Tapia is a sub-unit in the State Parks, and is on Las Virgenes Road in Malibu Canyon, which is a designated Scenic Hwy. Perimeter visitor centers should just be locations that are very limited in size and not buildings of their own. In addition to having literature available on Park activities and programs, there should be maps and brochures to give visitors parkland information needed to really enjoy their experience. That information should include locations near parklands of overnight accommodations and the different types (campgrounds, bed and breakfasts, hotels/motels); transportation options (bus and shuttle options, driving routes); and pamphlets of organizations they can contact that support recreation and the types of support, such as guided walk/hike/bike, rental of horses or mountain bikes, trail maintenance and docent programs.
9. [This comment is merged into the response column for better readability.]

4. This statement or opinion has been considered. No change has been made to the GMP/EIS. The NPS welcomes the continuing involvement of the public in the management of the SMMNRA and appreciates the thoughtful and committed input received on the GMP/EIS.
5. This information, action, or recommendation has been considered. Both the preferred and the recreation alternatives have been amended to include the overnight trail camps proposed in the Santa Monica Mountains Area Recreational Trails Coordination Project Report. The precise implementation of the camps will be established in specific development plans that are beyond the scope of this document in detail. The remainder of these remarks speak to concerns more detailed than the scope of the General Management Plan. They will be used in the formulation of a Draft Trail Management Plan, expected for release sometime in late 2002 or early 2003.
6. These recommendations speak to a level of consideration more detailed than the scope of the General Management Plan. They will be consulted by the National Park Service and the U.S. Navy in the formulation of future plans for the development of the Mugu Lagoon Visitor Education Center, keeping in mind this is an area of high environmental sensitivity.
7. These comments are generally consistent with the management prescriptions and the preferred alternative proposed in this GMP/EIS.
8. This statement or opinion has been considered. No change has been made to the GMP/EIS. The NPS welcomes the continuing involvement of the public in the management of the SMMNRA and appreciates the thoughtful and committed input received on the GMP/EIS.
9. This comment is generally consistent with current practices; for which no changes are anticipated.

COMMENTS

RESPONSES

SMMNRA Draft GMP – Comments from SMMTC
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Page 3

- 10. The visiting equestrian has been ignored in the Plan. The following problems are especially called to your attention: no hitching rails at restrooms, no water facilities, no equestrian campgrounds, only one trail camp (at Topanga State Park), and very poor trailhead parking. Horse trailers, also called rigs, should have adequate parking access at trailheads, otherwise that park visitor is denied access. As an example, the parking at Cheeseboro Canyon is inadequate. Even when rangers are present, they do not request car drivers to not park at the only places that rigs can park, so consequently there is rarely room for even one rig NPS said 10 years ago that they were planning to remedy that situation. Result - nothing has been done. Also, trails that are in a state of disrepair, ie. Hondo Canyon, and Saddle Creek segments of the BBT, and the Rising Sun Trail deny access to equestrians.
- 11. There is no acknowledgement of the historic and cultural values of the ranches, farms and original land grants that were instrumental in preserving this land – Roberts Cattle Company (Solstice), Danielson Ranch, Will Rogers Ranch, Sampo Ranch (Hope), Cheeseboro Dairy Farm, Ringe Ranch, Reagan Ranch, Musch Ranch, Trippett Ranch, etc The rural lifestyle has long been cherished in this area.
- 12. Other comments: Organized hikes, runs, and rides through the State and Federal parklands introduce many people from outside the area to the Park.
- 13. Page 43 – in referring to MBU, you omitted this information. The equestrian Mounted Assistance Unit (MAU) was formed over 25 years ago and was the first volunteer patrol program in the mountains The MBU and the VIP came years later and were modeled after the MAU, which continues to patrol the parklands on horseback.

Question. What is “harmonious development?”

In your review and revision of this Plan, we would be most happy to participate in assisting you toward the realization of a better plan for the public.

Thank you for listening to our comments and for extending the comment period.

Sincerely yours,

Linda Palmer
Linda Palmer, Vice President

- 10. These remarks speak to concerns more detailed than the scope of the General Management Plan. They will be used in the formulation of a Draft Trail Management Plan, expected for release sometime in late 2002 or early 2003.
- 11. This information, action, or recommendation has been considered. Careful readers will note a number of references in the GMP/EIS to the historic ranches located throughout the Santa Monica Mountains. A number of these require further study and more detailed plans for protection as indicated on page 171 of the document.
- 12. The National Park Service agrees with this conclusion, so long as the proposed events do not risk the enjoyment of recreational opportunities and park resources available to the general public.
- 13. We appreciate being alerted to this error. The description of the affected environment contained in the DEIS has been modified (on page 43).



COMMENTS

COMMENTS TO THE DECEMBER, 2000 DRAFT GENERAL MANAGEMENT PLAN AND ENVIRONMENTAL STATEMENT, SANTA MONICA MOUNTAIN NATIONAL RECREATION AREA DATED MARCH 1, 2001

Submitted by Dorian Keyser, Chair of the Santa Susana Mountain Task Force of the Sierra Club, vice-president and Lands Committee Chair, Santa Susana Mountain Park Association.

PLEASE SEND A COPY OF EACH FUTURE STUDY, MEETING NOTICE, ETC. TO ME AT 5922 CORBIN AVE., TARZANA, CA. 91356 AND REFER TELEPHONE CALLS TO 818-345-3795.

References:

1. December, 2000 Draft General Management Plan and Environmental Impact Statement, Santa Monica Mountains National Recreation Area, referenced herein as DGMPEIS.
2. Santa Monica Mountains Area Recreational Trails Coordination Project Final Report, Dated September, 1997, referred herein as SMAART.
3. Comprehensive Design Plan 1996. Referred herein as CDP.
4. California State Parks Magazine, Eighth Edition. Copyrighted in 1999 by American Park Network. Referred herein as CSEM.

The DGMPEIS is a very outstanding document. I participated in a community meeting of the NPS for references 2 and 3 and also at other times. I also frequently attend and testify at meetings of the Santa Monica Mountains Conservancy and work hard to obtain federal, state, and local funds for the Santa Monica Mountains, Simi Hills, and Santa Susana Mountains.

I recommend the following:

1. The adoption of the Preservation Alternative with changes, including those of this submittal.
2. I strongly urge that community efforts and efforts by elected officials (e.g., Rep. Brad Sherman, Sen. Barbara Boxer, State Senator Sheila Kuehl, etc.) be mobilized to expand the Santa Monica National Recreation Area to include the Simi Hills. However, this should be independent of the staff of the local NPS.
3. I understand that the DGMPEIS is the product of an evolutionary process which included two previous iterations. Unfortunately, these efforts consumed considerable time. Now that the deadline for submitting public comments to it has been delayed until May 30 of this year, when will the final version of it be available?? Unfortunately, the world goes on, developments within the Santa Monica Mountains and Simi Hills continue unabated, leaving many of our aspirations unfulfillable. Thus, I strongly urge that much greater urgency be exerted to finalize this much needed document and in making it available to federal, state, local and activists so that all of us can work to obtain funds to make it a success.
4. Except for existing NPS facilities in the Simi Hills, the boundary of the NPS Santa Monica Mountains National Recreation Area is defined by federal law to be between the Pacific Ocean and the 101 Freeway, despite the fact that wildlife and native vegetation do not obey arbitrary boundaries!! Thus, should the corridors that are now used by wildlife to/from the Santa Monica Mountains from/to the much larger Los Padres and Angeles National Forests via the Simi Hills and Santa Susana Mountains be severed, then genetic diversity of mountain lions, and to a lesser extent, smaller predators, will suffer due to inbreeding. The results will be the extinction of mountain lions in the Santa Monicas in 30-40 years. This will result in the over population of California mule deer and smaller prey animals. Moreover, the populations of other predators--coyotes, bobcats, ringtails, raccoons, foxes--will increase, thereby increasing the threats to birds, rabbits, squirrels, possums, and other small creatures.

RESPONSES

1. This information, action, or recommendation has been considered. Decisions involving this important planning component for the SMMNRA are outside the scope of the GMP and accompanying DEIS analysis. Another entity or agency holds the management or decision making authority for this component. The analysis contained in the GMP/EIS will be available to assist other SMMNRA decision makers, however, decisions involving this component will not be made by the NPS in the ROD for the GMP/EIS.
2. This statement or opinion has been considered. No change has been made to the GMP/EIS. The NPS welcomes the continuing involvement of the public in the management of the SMMNRA and appreciates the thoughtful and committed input received on the GMP/EIS.
3. This information, action, or recommendation has been considered. The commenter's conclusions and concerns are shared by the National Park Service. The description of the affected environment contained in the DEIS has been modified. The preferred alternative element pertaining to connectivity has been modified to reinforce the importance of wildlife corridors.

COMMENTS

RESPONSES

Page 2

4. 5. The NPS has limited the DGMP/EIS to the Santa Monica Mountains National Recreation Area. However, it should also include all publicly owned and hoped for parks and open spaces (i.e., federal, state, county, city, special districts, the Santa Monica Mountains Conservancy and its joint powers agencies plus privately owned parks and open spaces). It is artificial to consider only NPA owned properties and hoped for NPS acquisitions. Please remember that this information is vitally needed to define the status of wildlife corridors, trails, streams, rivers, creeks, dams, geology, archeology, plants, and animals in the Santa Monica Mountains and Simi Hills. Thus, the report should include accurate maps showing the lands owned by all pertinent jurisdictions, a description of these lands, their present ownership, and other pertinent information.
6. Preliminary list of public and private parks and open spaces in the Simi Hills:
- a. 2633 acre Ahmanson Ranch Dedication (SMC owned)
 - b. 900 acre Ahmanson Open Space (private dedication by Washington Mutual).
 - c. Cheesboro Canyon (NPS owned)
 - d. Palo Comado Canyon (NPS owned).
 - e. Calabasas Landfill (L.A. County owned, will become park when the landfill capacity has been reached in about 2020)
 - f. Bridal Path Open Space. (private)
 - g. Challenger public park.
 - h. Wood Ranch public open space.
 - i. Lang Ranch public park.
 - j. Liberty Canyon (Public owned)
 - k. Oakbrush County Park (Ventura County owned).
 - l. 625 acre Sage Ranch (SMC owned).
 - m. Cosca Public Open Space
 - n. North Ranch Public Open Space.
 - o. Rochetdyne (Owned by Boeing Co. They will be amenable to a conservation easement for the wildlife corridor and they want to preserve the very important Chumash rock paintings.
 - p. Brandeis (Brandeis Institute will be amenable to a conservation easement to safeguard the wildlife corridor.)
- Enclosed is a copy of a map that is available from the Santa Monica Mountains Conservancy which is titled "Parklands and Wildlife Corridors in the Santa Susana Mountains, Simi Hills, and Santa Monica Mountains.
5. 7. Figures 6-8 of DGMP/EIS include "land for future study". However, these studies will be moot unless they are completed in a very timely manner since much of them are already developed or are in imminent danger of being developed.
8. Places for the public to camp overnight in the Santa Monica Mountains and Simi Hills are at a premium. The study should include detailed information about existing overnight group and individual campsites at each public park and beach where they exist. It should also identify additional planned/potential campsites at other locations. Reference 4 has the data for all California State Parks and Beaches. The SMAART Report recommends twelve campsites along the Backbone Trail, of which only four existed when this report was released. I suggest that the DGMP/EIS include the status of each of these twelve and the capabilities of each. We need to have sufficient campsites along the Backbone Trail so that people can journey from one end to the other and camp as the need arises, whether they are hiking, mountain biking, riding horses, or enjoying nature.
9. Trails:
6. a. Backbone Trail-Milt McAuley has a current map of the Backbone Trail. He can be reached at 818-347-6433, FAX 818-702-0171. He is a key member of the Santa Monica Mountains Trails Council. The map should include trails that access the Backbone Trail and overnight campsites along it. This map should be included in the DGMP/EIS. It should also be included in any revision of the SMAART Report or equivalent document.

4. This recommendation has been considered. The description of the Park has been modified to include selected public and private parklands.
5. This information, action, or recommendation has been considered. Both the preferred and the recreation alternatives have been amended to include the overnight trail camps proposed in the Santa Monica Mountains Area Recreational Trail Coordination Project Report. The precise implementation of the camps will be established in specific development plans that are beyond the scope of this document in detail. The description of the affected environment contained in the DEIS has been modified.
6. This information, action, or recommendation has been considered. This important planning component for the SMMNRA is too detailed or site-specific to be addressed in the GMP. However, your comments will be retained to be used in future planning efforts. Management guidance for this component will be developed later, at a finer scale, in an implementation plan providing more detail than the GMP (i.e., Trail Management Plan).

COMMENTS

RESPONSES

Page 3

9. Trails Cont.
6. b. Marge Feinberg Rim of the Valley Trail—This is an official state of Calif. Trail. The portions of it that are in the Santa Monica Mountains and/or Simi Hills should be included in the DGMPEIS and any successor to the SMART Report. Paul Edelman of the Santa Monica Mountains Conservancy can supply an official map of this trail.
7. 10. Griffith Park— I do not believe that Griffith Park should be considered as part of the Santa Monica National Recreation Area, despite the claim of some that it is part of the Santa Monica Mountains. I am concerned that by so including it, funds needed for more legitimate needs to preserve wildlands will be used for Griffith Park. For example, recently passed California State Proposition 13 has \$500,000,000 for state parks, of which \$88,000,000 has been allocated for a new state park in the Elysian Valley which will contain less than 1000 acres, whereas the needs of existing state parks in Los Angeles County have been mostly ignored.
11. DGMPEIS includes cost estimates, some of which are unrealistic and not likely to be funded. I strongly suggest that:
8. a. The highest priorities be given to acquisitions of land since land will be lost forever once it is developed, whereas facilities will only be delayed if we concentrate on land acquisitions first. However, I recognize that the more the public uses the NPS owned parts of the SMMNRA, the more likely increased funding will be obtained from Washington.
- b. Assuming that the DGMPEIS represents the long time aspirations of the NPS and public for the Santa Monica Mountains National Recreation Area, than the costs of establishing, maintaining, and staffing all fourteen of the centers of the Preferred Alternative of Figure 6 would make all of them unlikely during the near time. Therefore, I suggest that these fourteen items need to be prioritized. I further suggest that the following suggestions would achieve considerable cost savings and the opportunity to evaluate things based upon experience!
9. 1) The Olvera Street Visitor Station, the LAX Visitor Center Site, the 415 PCH Santa Monica/Pacific Coast Highway Visitor Information Site, and the Malibu Pier Visitor Contact Station should be given the lowest priority.
- 2) The William O. Douglas and Temescal Canyon Facilities should continue to be the responsibility of the Santa Monica Mountains Conservancy/MRCA, at no cost to the NPS, except perhaps, help with their maintenance.
- 3) The Scenic Coast Tour should not be implemented unless the vast majority of its operating expenses are covered by fees paid by its passengers.
- 4) The costs of the changes to the Leo Carrillo State Park/Beach and its operating costs should be funded by the California State Parks, not the NPS.
- 5) Historically, the Santa Monica Mountains Conservancy has purchased property with funds provided by state and/or local jurisdictions and sold them to the NPS for considerably less than their costs to the Conservancy. Thus, the tax payers of California and local jurisdictions have helped to pay their acquisition costs. I suggest that this situation will continue.
- 6) The Conservancy has obtained more than 10,000 acres as part of the Ahmanson agreement (i.e., Lower Corral Canyon, Runkel Ranch, and most of Ahmanson Ranch). Their agreement with SOCA resulted in land that will become the headquarters of the S.M. Mtns. National Recreation area and the Angeles District of Calif. State Parks. Hopefully, the Santa Monica Mountains and Simi Hills portions of these transactions will eventually become part of the NPS owned property.
- 7) The Calabassas Landfill was bought by Los Angeles County with funds which were destined for the acquisition of parks. L.A. County will make this a park when this landfills capacity is reached. It should then be donated to the NPS.
- 8) The Santa Monica Mountains Conservancy bought the Paramount Ranch Phase Two for about \$17,500,000 and sold it to the NPS for about \$9,000,000. Subsequently, the \$9,000,000 was used for projects within the Santa Monica Mountains zone.

7. This statement or opinion has been considered. No change has been made to the GMP/EIS. The NPS welcomes the continuing involvement of the public in the management of the SMMNRA and appreciates the thoughtful and committed input received on the GMP/EIS.
8. This statement or opinion has been considered. No change has been made to the GMP/EIS. The NPS welcomes the continuing involvement of the public in the management of the SMMNRA and appreciates the thoughtful and committed input received on the GMP/EIS.
9. This information, action, or recommendation has been considered. This important planning component for the SMMNRA is too detailed or site-specific to be addressed in the GMP. However, your comments will be retained for use in future planning efforts. Management guidance for this component will be developed later, at a finer scale, in implementation plans providing more detail than the GMP.

COMMENTS

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10. 2. The restoration of the historic southern steelhead run in Malibu Creek and its tributaries requires the removal of the silted up 104 foot high Ringe Dam and another dam further up stream. This should be a long term goal of the Santa Monica National Recreation Area and be mentioned in the DGMIS.
13. Pollution due to run-off from the Ahmanson Ranch into Los Virgenes Creek should not be permitted as this might expose downstream creatures, such as the steelhead, to risk.

Enclosures:

1. Rim of the Valley Trail Corridor--Santa Monica Mountains Conservancy Zone
Rim of the Valley Trail and Major Loop and Access Trails.
2. Parklands and Wildlife Corridors in the Santa Susana Mountains, Simi Hills, and Santa Monica Mountains

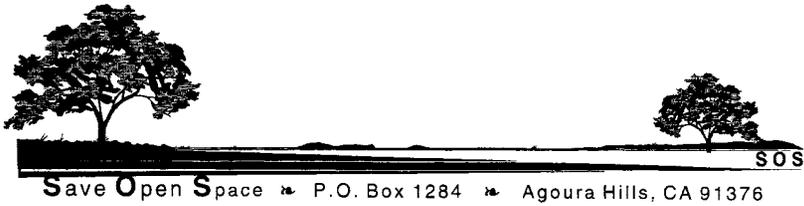
10. This information, action, or recommendation has been considered. These comments are consistent with the goals and planning objectives of the GMP/EIS. A Biological Assessment is being prepared to address the steelhead trout.





COMMENTS

RESPONSES



February 8, 2001

Re: General Management Plan & EIS

Dear Superintendent Art Eck:

- 1. Save Open Space/Santa Monica Mountains believes that in order to insure **the ecological integrity** of the Santa Monica Mountains National Recreation Area (SMMNRA) that the **whole of King Gillette Ranch (Soka)** and the **whole of Ahmanson Ranch** be added to the SMMNRA. These are the last two largest tracts of lands remaining necessary to protect natural resources of the SMMNRA and the Malibu Creek watershed. Parkland purchase of these two critical resource and watershed properties should be included as a main theme in this SMMNRA GMP.

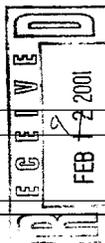
Secret easements now reveal that LasVirgenes Creek is owned by Washington Mutual, the developer of Ahmanson Ranch. Because the water rights to Las Virgenes Creek were grabbed secretly by Washington Mutual, Las Virgenes Creek can not be included in the proposed boundary change. Also, the developer owns easements over the entire Ahmanson Open Space and has a pumping project planned for the Las Virgenes aquifer which could strip it to a dry bone. To stop this secret water grab which was not reviewed by environmental assessment by the public and public agencies, the NPS must make the purchase of the entire Ahmanson Ranch as one of its primary goals in this GMP.

- 1. This statement or opinion has been considered. No change has been made to the GMP/EIS. The NPS welcomes the continuing involvement of the public in the management of the SMMNRA and appreciates the thoughtful and committed input received on the GMP/EIS.

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- 2. A boundary change to include the **whole** of Ahmanson Ranch is necessary for preservation of the SMMNRA:
- 3. 1. **Natural resources** are unparalleled: The fastidious California Red Legged frog is found living in Las Virgenes Creek ecosystem. It is there because Las Virgenes Creek is the most pristine headwaters left in the entire the SMMNRA. This frog species which comes under the ESA is found nowhere else in the SMMNRA. Other unique natural resources include: 8000 oaks, 400 acres of unique California native grasslands, the Braunton's milk-vetch plant (Astragalus Brauntonii), and the thought to be extinct San Fernando Valley spineflower, ^{Vegetation July 11} ^{Santa Susanna}
- 4. 2. **Water quality and water resources:** This is the only headwaters of the Malibu Creek watershed which stays wet all year long. Preservation of this headwaters will serve to protect the downstream delicate species of the Tidewater Gobi and the Steelhead Trout. ^{Figure 10 - change to Malibu Creek watershed map.}
- 5. 3. **Wildlife Corridor:** The wildlife corridor runs through the ranch not around it. (see enclosed Santa Susanna Wildlife Corridor Study). The whole Ahmanson Ranch is critical foraging habitat for wildlife and raptors. The Las Virgenes Creek ecosystem is necessary for cover and water for animals.
- 6. 4. **Historical:** The Ahmanson Ranch has the most historical significance of any property in the SMMts zone. The DeAnza trail goes right through the ranch and this expedition camped at Las Virgenes Creek. It also has been and continues to be used for film making. The historical film Gone with the Wind was filmed there.
- 7. 5. **Archeological:** According to Chester King, the finding of manos there indicates the presence of a historical villages ^{Native American}
- 8. 6. **Hazards:** The property contains a flood plain and is geologically unstable and has a high fire history. FEMA monies should be used for the purchase of Ahmanson Ranch as parkland. Removing this disaster prone land from urban development will in the long run save the federal government millions for disaster bailouts.



- 2. This statement or opinion has been considered. No change has been made to the GMP/EIS. The NPS welcomes the continuing involvement of the public in the management of the SMMNRA and appreciates the thoughtful and committed input received on the GMP/EIS.
- 3. This statement or opinion has been considered. No change has been made to the GMP/EIS. The NPS welcomes the continuing involvement of the public in the management of the SMMNRA and appreciates the thoughtful and committed input received on the GMP/EIS.
- 4. This statement or opinion has been considered. No change has been made to the GMP/EIS. The NPS welcomes the continuing involvement of the public in the management of the SMMNRA and appreciates the thoughtful and committed input received on the GMP/EIS. The steelhead trout is currently the subject of a Biological Assessment, and this information will be considered by the decision -maker.
- 5. This statement or opinion has been considered. No change has been made to the GMP/EIS. The NPS welcomes the continuing involvement of the public in the management of the SMMNRA and appreciates the thoughtful and committed input received on the GMP/EIS.
- 6. This statement or opinion has been considered. No change has been made to the GMP/EIS. The NPS welcomes the continuing involvement of the public in the management of the SMMNRA and appreciates the thoughtful and committed input received on the GMP/EIS.
- 7. This statement or opinion has been considered. No change has been made to the GMP/EIS. The NPS welcomes the continuing involvement of the public in the management of the SMMNRA and appreciates the thoughtful and committed input received on the GMP/EIS.
- 8. This information, action, or recommendation has been considered. This important planning component for the SMMNRA is too detailed or site-specific to be addressed in the GMP. However, your comments will be retained to be used in future planning review activities. Management guidance for this component will be developed later, at a finer scale, in an implementation plan providing more detail than the GMP.



**COMMENTS****RESPONSES**

9. **7. Air Quality:** Urban development of Ahmanson Ranch will add more than 200 tons of smog to the air quality of the SMMNRA a year. Parkland preservation will continue the air shed function of the Ahmanson Ranch.

In summary, the boundary change must include all of the Ahmanson Ranch for the various reasons outlined above. Thank you for your kind attention.

Sincerely,

Mary E. Wiesbrock, Director

9. This statement or opinion has been considered. No change has been made to the GMP/EIS. The NPS welcomes the continuing involvement of the public in the management of the SMMNRA and appreciates the thoughtful and committed input received on the GMP/EIS. Additions to the air quality analysis have been made.

COMMENTS

RESPONSES

P18



Sierra Club

Conejo Group

From
Sierra Club Conejo Group
643 Old Farm Road
Thousand Oaks CA 91360

May 30, 2001

Contact John Holroyd (805) 495-6391

To
Superintendent, Arthur Eck
Santa Monica Mountains National Recreation Area
401 West Hillcrest Drive
Thousand Oaks CA 91360-4207

Re Sierra Club Conejo Group's comments on the SMMNRA's Draft General Management Plan/Environmental Impact Statement dated December, 2000

Dear Superintendent Eck

We are writing to comment on the Draft General Management Plan/Environmental Impact Statement for the Santa Monica Mountains National Recreation Area

Generally, we support the Preferred Alternative except for the items noted on Page 2 of this letter We especially like the Preferred Alternative's striving to achieve balance between the three interests of *recreation*, especially hiking and camping, *education* of the children who will both enjoy and be responsible for this valuable heritage in future, and *preservation* of the SMMNRA today for all of us and future generations to enjoy

We are particularly keen to encourage and ensure the widest diversity of use, especially access to the SMMNRA by families and family members -- for example, by parents accompanying their young children or older family members

The National Park Service is to be commended for pursuing land acquisitions to protect and expand the SMMNRA's natural resources This is a fantastic asset for all the people who live in or visit this area, and it can be a draw for visitors in its own right

The Conejo Group of the Sierra Club would like to continue to be informed about plans and projects affecting the SMMNRA, and we would like to volunteer whenever and however possible to participate in the NPS's planning process on an ongoing basis Please let us know how we might achieve this



COMMENTS

RESPONSES

Letter to Mr Arthur Eck
May 30, 2001
Page 2

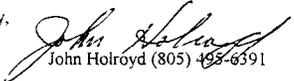
- 1. Our principal concerns with the SMMNRA GMP & EIS as it is presently drafted relate to the NPS's apparent lack of objection to opening the entire Backbone Trail to mountain bikers. Mountain biking is, in fact, a sport rather than a recreational activity (and, in fact, is treated as an extreme sport and a highly competitive activity in virtually all mountain biking publications) and should be restricted to roads suitable for 2-way bike traffic. Mountain biking is proving increasingly incompatible with family hiking or equestrian usage and should not be allowed anywhere on the Backbone Trail.

As described on Page 251 No Action Alternative #2, Backbone Trail completion, "Mountain bike riding could be moderately to highly destructive to cultural resources through the acceleration of erosion." We believe that evidence of such erosion caused by or accelerated by mountain biking is already apparent along portions of the Backbone Trail and many other trails and roads throughout the SMMNRA.

- 2. Immediate steps should be taken to prevent further damage.

- 3. Also, as stated on Page 287 Preferred Alternative - Visitor Experience, "Tourist use of SMMNRA would likely be focused on highly advertised areas." However, if the Backbone Trail in its entirety remains open to mountain biking -- essentially without restrictions or enforcement, as it is at present along much of its length -- it likely will become a worldwide magnet for competitive biking enthusiasts. Thus, other users -- especially families -- will be driven out. This is what has already occurred in Cheeseboro and Palo Comado Canyons on most weekends, especially for equestrians.

Thank you for considering these comments from the Conejo Group of the Sierra Club. We look forward to a reply at your convenience. If you have any questions, please feel free to contact me directly.

Sincerely,

John Holroyd (805) 499-6391

Sierra Club Conejo Group
643 Old Farm Road
Thousand Oaks CA 91360

- 1. These issues are identified at a general level (page 38) in the GMP/EIS, commensurate with the detail level of the plan. Efforts to resolve some of these conflicts will require proposals more detailed than the scope of the General Management Plan. The concerns expressed here will be used in the formulation of a Draft Trail Management Plan, expected for release sometime in late 2002 or early 2003.
- 2. This statement or opinion has been considered. No change has been made to the GMP/EIS. The NPS welcomes the continuing involvement of the public in the management of the SMMNRA and appreciates the thoughtful and committed input received on the GMP/EIS. The National Park Service will continue to monitor resource conditions to ensure against the impairment of park values.
- 3. These remarks speak to concerns more detailed than the scope of the General Management Plan. They will be used in the formulation of a Draft Trail Management Plan, expected for release sometime in late 2002 or early 2003.

COMMENTS

RESPONSES

William D. Ross
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File No: 184/3.6

May 30, 2001

Mr. Arthur Eck
General Management Plan Comments
National Park Service
401 Hillcrest Drive
Thousand Oaks, CA 91360

Re: Comments on Behalf of Soka University of America on Draft General Management Plan and Environmental Impact Statement Issued December 2000

Dear Mr. Eck

On behalf of my client, Soka University of America (the "University"), I offer the following comments on the Draft General Management Plan and Environmental Impact Statement (the "Management Plan") issued in December of 2000. While the document purports to give an accurate view of present conditions within the Santa Monica Mountains National Recreation Area (the "SMNRA"), it is replete with factual errors.

- 1. In only two places (Figure 3 and Tables 24 - 26) do you correctly identify the 588 acre University campus as the "Soka property." You erroneously refer to the "Gillette Ranch" as if it were a separate and distinguishable parcel of land. It is not. Since 1986 the
- 2. University has owned this land, and as you are well aware, the University has applied for and received all approvals necessary to expand the existing facilities to accommodate 650 students. While the Management Plan takes great pains to note projects proposed within the SMNRA, it does not acknowledge our project.
- 3. When discussing the relationship between the public and private land owners within the SMNRA, the Management Plan fails to note that there are numerous privately owned recreational facilities that accomplish many of the Management Plan's stated goals. I would respectfully note that one such facility, Pepperdine's Cottontail Retreat, is located adjacent to the University. The Management Plan's failure to note these facilities, and others, and the important role they play in providing public access to the SMNRA leaves the public and elected officials who will review the Management Plan with an inaccurate view of both existing conditions and the impacts related to the Preferred Alternative.

The University engaged in months of long dialogue with the National Park Service ("NPS") ten years ago. During those discussions, we offered to dedicate approximately 70 acres of our land to the NPS, build a joint administrative facility for the NPS on that parcel,

- 1. The Gillette Ranch, as used in the plan, refers to the complex of historic structures and associated lands located at the southwest corner of Mulholland and Las Virgenes/Malibu Canyon Roads. By virtue of its cultural significance as well as its strategic location relative to the SMMNRA, it does have distinguishable characteristics.
- 2. The GMP/EIS seeks to evaluate the plan in the context of the cumulative impact of future projects, accepting the current condition of the environment as its benchmark. Given that understanding, the University's project is treated as an element of the current condition.
- 3. The National Park Service agrees that the private sector plays a critical role in offering direct and indirect recreational services in the Santa Monica Mountains. Moreover, it is Service policy to encourage the development of private recreation services for the general public when and as appropriate, rather than compete with them. Therefore, a Mission Goal, under the Visitor Experience section beginning on page 41, has been added to ensure that this principle is prominently reflected in park planning and policies. Additional information concerning the current role played by private recreation vendors has been incorporated in the descriptive text of the GMP where pertinent.

Consultation and Coordination
Comments and Responses - Organizations





COMMENTS

RESPONSES

Mr Arthur Eck
 General Management Plan Comments
 National Park Service
 May 30, 2001
 Page 2

and provide an endowment fund to cover the costs of maintenance of the new facility and land. Our offer was rejected. The approvals for expansion mentioned earlier include a requirement that when construction begins the University must dedicate approximately 380 acres of land to the Mountains Recreation and Conservation Authority (the "MRCA). Another 37 acres will become conservation easements and the University will need to improve existing

4. trails to facilitate public access to these lands. As the MRCA and the Santa Monica Mountains Conservancy ("Conservancy") helped draft this document, the University is surprised that these facts are not considered in the Management Plan.

The University would also respectfully note that storm water and drainage facilities proposed in our project, will actually improve the quality of the water sent down stream that might impact the steelhead trout. Nowhere in the Management Plan do you discuss the loss of these facilities should our project not proceed. Again, this gives readers of the Management Plan an inaccurate view of current and proposed conditions within the SMNRA.

- 5.

Finally, in March of 1996, Congressman Tony Beilenson announced a framework for settlement that led to the resolution of litigation involving the University, the MRCA, the Conservancy, and the County of Los Angeles. In making this announcement, the Congressman acknowledged that the resources are simply not there to acquire the University's property. We therefore request that the NPS discontinue showing the "Gillette Ranch," or any part of the University's land holding as the future site of a joint administrative facility for the SMNRA.

- 6.

Very truly yours,

William D. Ross

WDR-mek

cc: Mr. Arnold Kawasaki
 Vice President for Administration
 Soka University of America

4. On the matter of Gillette Ranch, the Santa Monica Mountains Conservancy stands apart from the National Park Service and the California State Parks, feeling it is bound by its prior agreement to accept the presence of Soka University.
5. The plan does not envision the loss of facilities. Rather it would anticipate wide public access and benefit as a result of administration and operation by the park agencies of the Santa Monica Mountains.
6. The National Park Service believes that if the University presents a reasonable offer to the American people, the property should be, will be and can be acquired. The plan is not intended to interfere with the current owners' enjoyment of their property. At the same time, it is intended to anticipate the most desirable future condition for the Santa Monica Mountains National Recreation Area, and guide the actions of the park agencies who manage its resources. It is the professional opinion of the National Park Service and the California State Parks that the protection of the resources of the Santa Monica Mountains, and the overall enhancement of the public good derived from the recreational, health, and educational opportunities that such protection would afford, is best served by the purchase of the property for park purposes.

A p p e n d i x e s





A P P E N D I X E S

National Park Service Enabling Legislation – Laws Affecting NPS

Americans with Disabilities Act of 1990

States that all new construction and programs will be accessible. Planning and design guidance for accessibility is provided in the Architectural and Transportation Barriers Compliance Board (36 CFR Part 1191). Additionally, NPS Special Directive 83-3 states that accessibility will be proportional to the degree of development, i.e., areas of intense development, visitor centers, museums, drive in campgrounds, etc., will be entirely accessible and areas of lesser development, i.e., back country trails and walk in campgrounds, would have fewer accessibility features.

American Indian Religious Freedom Act

Declares policy to protect/preserve the inherent and constitutional right of the American Indian/Eskimo/Aleut/Native Hawaiian people to believe/express/exercise their traditional religions and calls for a now-completed evaluation of federal procedures/general objectives/policies. Statute imposes no specific procedural duties on federal agencies. Religious concerns should be accommodated or addressed under NEPA/CEQA or other appropriate statutes.

Archaeological and Historic Preservation Act of 1974

Amends and updates Reservoir Salvage Act of 1960 to broaden legislation beyond dam construction. Provides for the preservation of significant scientific, prehistoric, historic, or archeological data (including relics and specimens) that might be lost or destroyed as a result of (1) the construction of dams, reservoirs, and attendant facilities, or (2) any alteration of the terrain caused as a result of any federal construction project or federally licensed project, activity,

▲ *Chumash
Dancers
(NPS photo).*



or program. Provides for the recovery of data from areas to be affected by federal actions.

Archaeological Resources Protection Act of 1979

Secures the protection of archeological resources on public or Indian lands and fosters increased cooperation and exchange of information between private/governmental/professional community in order to facilitate enjoyment/education of present and future generations. Regulates excavation and collection on public and Indian lands. Defines archeological resources to be any material remains of past human life or activities that are of archeological interest and are at least 100 years old. Requires notification of Indian tribes who may consider a site of religious or cultural importance prior to issuing permit. Amended in 1988 to require development of plans for surveying public lands for archeological resources and systems for reporting incidents of suspected violations.

National Historic Preservation Act of 1966 (as amended)

Declares a national policy of historic preservation, including the encouragement of preservation on the state and private levels; authorizes the secretary of the interior to expand and maintain a National Register of Historic Places including properties of state and local as well as national significance; authorizes matching federal grants to the states and the National Trust for Historic Preservation for surveys and planning and for acquiring and developing National Register properties; establishes the Advisory Council on Historic Preservation; requires federal agencies to consider the effects of their undertakings on National Register properties

and provide the Advisory Council opportunities to comment (§106). Amended in 1976 (P.L. 94-422) to expand §106 to properties eligible for as well as listed in the National Register. Amended in 1980 (P.L. 96-515) to incorporate E.O. 11593 requirements, to give national historic landmarks extra protection in federal project planning, and to permit federal agencies to lease historic properties and apply the proceeds to any National Register properties under their administration. Amended in 1992 to, among other things, redefine federal undertakings, address “anticipatory demolition,” and emphasize the interests and involvement of Native Americans and Native Hawaiians.

Native American Grave Protection and Repatriation Act

Assigns ownership or control of Native American human remains, funerary objects, sacred objects and objects of cultural patrimony that are excavated or discovered on federal lands or tribal lands after passage of the act to lineal descendants or culturally affiliated Native American groups; establishes criminal penalties for trafficking in remains or objects obtained in violation of the act; provides that federal agencies and museums that receive federal funding shall inventory Native American human remains and associated funerary objects in their possession or control and identify their cultural and geographical affiliations within 5 years, and prepare summaries of information about Native American unassociated funerary objects, sacred objects, or objects of cultural patrimony. This is to provide for repatriation of such items when lineal descendants or Native American groups request it.

Protection of Historic and Cultural Properties, E.O. 11593; 36 CFR 60, 61, 63, 800; 44 FR 6068

Instructs all federal agencies to support the preservation of cultural properties; directs them to identify and nominate to the National Register cultural properties under their jurisdiction and to “exercise caution... to assure that any federally owned property that might qualify for nomination is not inadvertently transferred, sold, demolished, or substantially altered.”

Clean Air Act (as amended)

Purpose is to prevent and control air pollution; to initiate and accelerate research and development; and to provide technical and financial assistance to state and local governments in connection with the development and execution of air pollution programs. Act establishes requirements for areas failing to attain National Ambient Air Quality Standards. Provides for prevention of significant deterioration of areas where air is cleaner than NAAQS.

Coastal Zone Management Act of 1972

States national policy to “preserve, protect, develop, and where possible, to restore or enhance the resources of the nation’s coastal zones” (including those bordering the Great Lakes) and to encourage and assist the states (through 1977) in developing their management plans for the non-federal lands and waters of their coastal zones. NPS actions should conform to approved state coastal zone management plans to the maximum extent possible. Applicants for federal licenses and permits are required to certify that their activities are consistent with management programs of directly affected states.

Comprehensive Environmental Response Compensation and Liability Act (commonly known as Superfund)

Regulates the cleanup of hazardous or toxic contaminants at closed or abandoned sites. Establishes a fund available to states for cleanup of abandoned sites; funds come from taxes levied on designated chemical feedstocks. Government could recover cost of the cleanup and associated damages by suing the responsible parties. The act was reauthorized in 1986 under the Superfund Amendment Reauthorization Act; §120 specifies that CERCLA applies to federal facilities.

Endangered Species Act of 1973 (as amended)

Requires federal agencies to ensure that any action authorized, funded or carried out does not jeopardize the continued existence of any endangered or threatened species or result in the destruction or adverse modifications of critical habitat. Section 7 requires all federal agencies to consult with Interior and to... ensure that any action authorized, funded or carried out by such agency(ies)...is not likely to jeopardize the continued existence or destruction or adverse modification of habitat of such species which is...critical.

Executive Order 11988: Flood Plain Management

Requires federal agencies to avoid, to the extent possible, the long- and short-term adverse impacts associated with the occupancy and modifications of flood plains, and to avoid direct and indirect support of flood plain development wherever there is a practicable alternative. Directs all federal agencies to avoid, if possible, development and other activities in the 100-year (or base) flood plain. Existing structures or facilities in



such areas and needing rehabilitation or preservation treatment, restoration, or replacement will be subject to the same scrutiny as for new facilities or structures. In the case of historic structures, this scrutiny will be but one factor in determining their preservation. Highly significant and irreplaceable records, historic objects, structures, or other cultural resources may not be located in the 500-year flood plain. No critical actions (actions for which even a slight risk is too great, such as clinics, hazardous materials storage, major fuel storage facilities, and 40,000 gpd or larger sewage treatment facilities) will occur in the 500-year flood plain.

Executive Order 11990: Protection of Wetlands

Requires federal agencies to avoid, to the extent possible, the long- and short-term adverse impacts associated with the destruction or modification of wetlands and to avoid direct or indirect support of new construction in wetlands wherever there is a practicable alternative.

Executive Order 12898 (Environmental Justice in Minority and Low-Income Populations)

This Executive Order directs federal agencies to assess whether their actions have disproportionately high and adverse human health or environmental effects on minority and low-income populations. An analysis of this topic is provided in Section 4.2.9.4.

Federal Water Pollution Control Act (commonly referred to as the Clean Water Act)

Furtheres the objectives of restoring and maintaining the chemical, physical, and biological integrity of the nation's waters and of eliminating the discharge of pollutants into navigable waters by 1985. Establishes

effluent limitation for new and existing industrial discharge into U.S. waters. Authorizes states to substitute their own water quality management plans developed under section 208 of the act for federal controls. Provides an enforcement procedure for water pollution abatement. Requires conformance to permit required under section 404 for actions that may result in discharge of dredged or fill material into a tributary to, wetland, or associated water source for a navigable river.

Marine Mammal Protection Act

Provides marine mammals with necessary and extensive protection against commercial exploitation, technology, and possible extinction. Exceptions are allowed for specific, approved research and incidental taking in the course of certain commercial fishing operations. Any Indian, Aleut, or Eskimo who resides in Alaska and who dwells on the coast of the North Pacific Ocean or the Arctic Ocean is exempt from the moratorium on taking if such taking is for subsistence purposes or is done for the purposes of creating and selling authentic native articles of handicrafts and clothing, in each case accomplished in a non-wasteful manner.

National Environmental Policy Act of 1969

NEPA/CEQA is the basic national charter for environmental protection. Establishes policy, sets goals, and provides means for carrying out the policy. Contains an "action-forcing" provision to ensure that federal agencies act according to the letter and spirit of the law. Requires a systematic analysis of major federal actions that will consider all reasonable alternatives as well as an analysis of short-term and long-term, irretrievable and irreversible, and unavoidable impacts. Also establishes the Council on Environmental Quality.

Resource Conservation and Recovery Act

Governs disposal of hazardous and/or solid waste (includes landfills) (NPS staff directive 76-20). Establishes guidelines for collection, transport, separation, recovery, and disposal of solid waste. Creates major federal hazardous waste regulatory program. Provides assistance to establish state or regional solid waste plans.

Rivers and Harbors Act of 1899

Establishes Army Corps of Engineers' regulatory authority over U.S. navigable waters. Establishes permit requirements for construction of bridges, causeways, dams, or dikes within or over navigable waters of the U.S. Bridge and causeway construction is regulated by the Transportation Secretary, while dam and dike permits are reviewed by the Corps of Engineers. §10 requires a Corps permit for construction of any "obstruction of navigable waters" of the U.S., and for any excavation, fill, or other modification to various types of navigable waters. §13 requires a Corps permit for discharge of refuse of any kind (except liquid from sewers or urban runoff) from land or vessel, into the navigable waters of the U.S. or into their tributaries. Similarly, discharge of refuse is prohibited upon the banks of navigable waters or their tributaries where the refuse could be washed into the water.

Specific Development Projects

The following projects have been identified as significant projects in the region to be included in the cumulative impacts analysis for the SMMNRA GMP/EIS. The general location of these projects is shown on Figure 13.

MUNICIPAL WATER DISTRICT PROJECTS INCLUDING LAS VIRGENES MUNICIPAL WATER DISTRICT, CALLEGUAS MUNICIPAL WATER DISTRICT, AND THE CITY OF LOS ANGELES

Creek Discharge Avoidance Study Alternatives

The project study area is located in the northwestern quadrant of the County of Los Angeles and the southeastern most quadrant of the County of Ventura, covering a very large area within the SMMNRA and SMMZ. The purpose of the project is to identify and evaluate the feasibility of implementing various alternatives to avoid the discharge of recycled water from Tapia Water Reclamation Facility (TWRP) into Malibu Creek. This action is taken to comply with provisions of the National Pollutant Discharge Elimination System (NPDES) Permit requirements issued by Los Angeles Regional Water Quality Control Board (LARWQCB). A *Draft EIR* was prepared on August 25, 1999.

Las Posas Basin Aquifer Storage and Recovery Project

The proposed project is located above the Las Posas Groundwater Basin near the city of Moorpark in central Ventura County, northwest of the SMMNRA. The project would impact natural resources in the area. The project consists of installation of 30 injection/extraction wells, a pump/hydroelectric station, and approximately 26 miles of pipeline. The precise location of facilities has not been determined, however potential areas of installation have been identified. A *Final Program EIR* was prepared in April 1995.



Table 28

ADDITIONAL MAJOR WATER PROJECTS LOCATED WITHIN THE SMMRA OR SMMZ	
Project Name	Project Description
Oak Park/North Ranch Recycled Water Distribution System	The system is composed of transmission pipelines, a booster pumpstation, and a storage reservoir. The source of recycled water would be the TWRF and the water would be used for landscape irrigation.
Conejo Creek Diversion	The project includes improvements to existing storage basins, conversion of an existing reservoir to reclaimed water use, a pump station, and other modifications. Reclaimed water deliveries would be used for agricultural and urban turf irrigation.
Las Virgenes Reclamation Project	Recycled water would be used for landscape irrigation in the cities of Westlake Village and Calabasas. The project uses recycled water from the TWRF. The project water would be transported through nearly 11.5 miles of pipeline.
Calabasas Recycled Water System Extension	Recycled water is distributed in the Calabasas area and is an extension of the existing recycled water facilities. The project involves over 10 miles of pipeline and the expansion of a reservoir. The source of recycled water is from the TWRF.
Sepulveda Basin Water Reclamation	This project would provide recycled water for the Sepulveda Basin. The project involves the construction of several thousand feet of pipeline.

**LOS ANGELES DEPARTMENT OF
WATER AND POWER (LADWP)**

***Hollywood Water Quality
Improvement Project***

The project involves two of the world’s largest underground tanks that would store 60 million gallons of treated water with new pipelines linking the tanks to the current distribution system. Vegetation cleared during tank installation would be replanted. The tanks would be located next to the Upper and Lower Hollywood Reservoirs on the southern slope of the Santa Monica Mountains within the SMMZ.

Stone and Encino Reservoir

This project is proposed to comply with the State of California Surface Water Treatment Rule, and to improve water quality from the

Lower Stone Canyon and Encino Reservoirs. Both projects are located in the SMMZ, in “publicly owned open space.” A draft EIR has been prepared.

The proposed Stone Canyon Reservoir Complex includes four components: 1) a one-million-gallon diversion structure built and buried immediately north of Upper Stone Canyon Reservoir (USCR) on the northerly portion of the property south of Mulholland Drive, 2) a new chlorination station constructed immediately south of the existing chlorination station and west USCR, including storage of one-ton containers and a chlorine gas scrubber, 3) a bypass pipeline including two tunnel segments of 1,000 feet and 1,500 feet, and 5,400 feet of submerged pipeline in Lower Stone Canyon Reservoir (LSCR), and 4) a membrane filtration plant constructed south of LSCR dam. This project may impact some trees. A tree mitigation

plan would be implemented to minimize impacts. The diversion structure and pipeline will be buried and is subject to the *Mulholland Parkway Scenic Corridor Specific Plan*.

The Encino Reservoir Complex consists of two components: 1) four 60,000-gallon surge tanks constructed and buried near the existing pump station, and 2) a complex of structures constructed parallel to the reservoir access road including a membrane filtration plant, new chlorination station, new pumping station, industrial station, and chlorine gas scrubber. The existing chlorination and pumping stations would be demolished once the new facilities are operational. This project may impact some trees. A tree mitigation plan would be implemented to minimize impacts.

PRIVATE DEVELOPMENT PROJECTS

Ahmanson Ranch

The approved Ahmanson Ranch is located within the SMMZ in the southeast corner of Ventura County, approximately seven miles east of the unincorporated community of Oak Park and adjacent to the Los Angeles County line. The development plan includes the construction of 2,700 conventional dwelling units, 350 ancillary dwelling units, 400,000 square feet of office and commercial uses, a 300-room lodge, about 10 acres of public facilities, approximately 40 acres of public parks, two public school facilities, and two golf courses on 390 acres. The project impacts natural resources, including coastal sage scrub plant communities, riparian habitats, and native grassland. The primarily urban uses would be constructed in the southeastern third of the ranch surrounded by 915 acres of community open space. Approximately 2,633 acres of the western portion of the ranch are proposed for inclusion as public open space.

The land is currently owned by Mountains Recreation and Conservation Authority and eventually to the National Park Service for public use. In addition, as part of the development agreement, 7,316 acres of open space lands outside the Ahmanson Ranch property has been sold to the Mountains Recreation and Conservation Authority for permanent open space preservation. A Final EIR was prepared in November 1992. Several environmental impacts remain unresolved. In 1999 project consultants discovered a population of endangered red-legged frogs along East Las Virgenes Creek and an extensive population of the San Fernando spineflower, thought to be extinct since the 1920s. Mitigation for the two newly discovered species is currently being negotiated.

Gillette Ranch

The Soka University project is at the southeast corner of Mulholland Highway and Las Virgenes Road. The project planned for the expansion of the existing campus, featuring historic Gillette Ranch structures, into a 650-student campus of more than 440,000 square feet of building space. In July 2001 the California Court of Appeals ruled in favor of a lawsuit brought forth by local activist groups. The Court of Appeals found the EIR deficient, thus overturning the 1996 and 1997 approvals for the proposed expansion.

New Millennium Homes

New Millennium Homes is a multi-phased residential development of 550 homes located in the city of Calabasas, Los Angeles County in the SMMZ. A mitigated negative declaration has been prepared and was approved on February 10, 2000. The site is located south of residential developments along Ventura Freeway, west of Parkway



Calabasas, east of Las Virgenes Road and commercial and industrial development, and north of natural open space. The project would impact a wetland area in the southeastern corner of the site. The affected stream is the primary tributary of the McCoy Canyon watershed and the area of impact is approximately 4,000 square feet of waters/wetland and 6,400 square feet of riparian habitat.

Pepperdine University Upper Campus Development

The project is located on the Pepperdine University campus, adjacent to the city of Malibu within the SMMNRA. The project is located in the lower portion of the campus, which consists of 230 acres of developed area. Portions of the property to the north are within the Malibu Canyon Environmentally Sensitive Habitat Area (ESHA). Proposed lower campus development consists of a total of nine components and includes both the construction of new facilities and the expansion of existing facilities. A permit was required for the removal of two oaks. Mitigated negative declarations were prepared on July 7, 1997, for conditional use permits.

In 1999, Pepperdine received a Coastal Development Permit from the Coastal Commission to construct their long-term proposed "Upper Campus Development." The UCD proposed construction of a graduate business school complex with associated student and faculty housing and maintenance facilities on a 50-acre extremely steep site to the northwest of the current school. Over 4.5 million cubic yards of grading were approved, along with the decimation of over 14 acres of valley needlegrass and mixed grassland/coastal sage scrub. The valuable grassland was removed with no effort to salvage any part.

Salvation Army Camp

The project, located in Calabasas within the SMMNRA in Los Angeles County, proposes to replace a building with 24 sleeping rooms, a meeting room, and a small kitchen at a 640-acre existing Salvation Army Camp. The project is located in an ESHA, Significant Ecological Area (SEA) #5, and Malibu Creek is located on the project site. An oak tree permit is required. A mitigated negative declaration was prepared on February 16, 1996, for construction conditional use permits.

Mountain Gate

The Mountain Gate project is located on Stoney Hill Road in the SMMZ, adjacent to the area of potential expansion, in the Brentwood-Pacific Palisades community. The approved project would subdivide approximately 449.5 acres into 35 lots, 29 of which would be for single family homes, with lot sizes ranging from less than one acre to approximately 2.5 acres. Two lots would be private street lots. Less than 10 percent of the site is proposed for actual development. An EIR to examine possible impacts to plant and animal life is expected to be completed in July or August, 2000.

Live Oak Ranch

The 320-acre Live Oak Ranch project site is located in the SMMZ, adjacent to the area of potential expansion, in an unincorporated portion of Los Angeles County, adjacent to the city of Agoura Hills. The eastern portion of the project site is located in SEA No. 6. The project consists of 132 single-family residential homes. Proposed development would occupy approximately 64.6 acres, while the remaining 255.4-acre ungraded portion of the site would be retained as open space. An EIR is nearly ready for public review as of August, 2000.

Lake Eleanor Hills

The Lake Eleanor Hills project was approved in 1989 and is located in the southern portion of the city of Westlake Village, within the SMMZ and area for potential expansion. The project is surrounded by open space to the north and southeast. Residential developments occur to the west and northeast. The project is a residential subdivision of 59 lots, including 52 single-family lots on 74.54 acres. An Oak Tree Permit was required. A *Final EIR* was prepared and the project is currently under construction.

Westlake YMCA

The proposed location of the Westlake YMCA is on Lindero Canyon Road in the city of Westlake Village, within the SMMZ. A draft EIR is expected to be circulated in July or August, 2000.

Rancho Malibu Hotel

The Rancho Malibu Hotel is an approved project for a 160-room hotel in the SMMNRA within the city of Malibu. A mitigation and monitoring report indicates the loss of 8.04 acres of undisturbed coastal sage scrub.

Dayton Canyon Estates

The Dayton Canyon Estates project is located in the western portion of the city of Los Angeles, adjacent to the SMMZ, in the northwestern portion of SEA No. 14. The project includes the development of 175 single-family homes on 159.2 acres. Of the 159.2 acres, 91.2 would be dedicated as permanent open space. A *Final EIR* was prepared in April 1999.

Ramirez Canyon Park

Ramirez Canyon Park is located on Ramirez Canyon Road in the city of Malibu, in Los Angeles County, within the SMMNRA. Ramirez Canyon drains into a riparian corridor designated as a blueline stream on U.S. Geological Survey quadrangle maps. The creek bisects Ramirez Canyon Park and supports a remnant riparian canopy of mature sycamores and scattered oaks on the highly modified park grounds. Ramirez Canyon Creek is designated as an ESHA on the certified Malibu/Santa Monica Mountains Land Use Plan (LUP) Resource Maps. The riparian corridor flanking the creek is designated as a Locally Disturbed Sensitive Resource (DSR) in the LUP. The approved project includes the conversion of five single family residences on six lots to use for offices and various facilities, the installation of two water tanks, onsite parking, construction of a new wastewater treatment facility and various other park improvements on 22.5 acres. A mitigated negative declaration was issued by the California Coastal Commission on March 30, 2000.

Malibu Terrace

The Malibu Terrace project was approved in 1995 and the property has recently been graded. The project is located on the west side of Las Virgenes Road, on the Ventura / Los Angeles County boundary, within the SMMNRA. Open space surrounds the project on the north, south, and west. The west side is immediately adjacent to NPS property. Oak and coastal sage scrub would be impacted. The project involves the development of 393 acres into roughly 110 single family homes, multi-family homes, and commercial development.



GOVERNMENT DEVELOPMENT PROJECTS

Coldwater Canyon Reservoir Project

The Coldwater Canyon Reservoir project is near the city of Beverly Hills within the SMMZ. The project involves the replacement of a 70-year-old, 7.7 million gallon reservoir with a new 9.1 million gallon reservoir, as well as a 1.8 gallon reservoir on a city-owned site. Tree removal approval would be required. A *Draft EIR* was prepared on April 8, 1998.

City of Calabasas General Plan

The city of Calabasas circulated a *General Plan EIR* in September 1995 and the cumulative impacts section was considered in the SMMNRA cumulative impacts analysis.

Calabasas Landfill

The Calabasas Landfill is located in the SMMNRA, near Agoura Hills, north of the Ventura Freeway in Los Angeles County. A special use permit (SUP) proposes the continuing operation of the Calabasas Landfill at current daily levels, permitted to accept a maximum of 3,500 tons per day of waste, from 1995 until the landfill reaches the permitted capacity. Natural habitat would be affected and mitigation would occur both onsite and offsite. Specific new requirements would be made as conditions of the SUP for continuing landfill operation. An Environmental Assessment was prepared in September 1998, by the National Park Service.

Legislation

Refer to the Appendix for the Public law related to the Santa Monica Mountains National Recreation Area.

Appendix of Tables

Refer to pages 598-610 for Tables: 2, 3, 4, 5, and 6.

Cost Estimates

Refer to pages 611-614 for Cost Estimates relative to each alternative.

Air Quality

Refer to pages 615-617 for additional data on air quality.

United States Code

- TITLE 16 - CONSERVATION
 - CHAPTER 1 - NATIONAL PARKS, MILITARY PARKS, MONUMENTS, AND SEASHORES
 - SUBCHAPTER XCV - SANTA MONICA MOUNTAINS NATIONAL RECREATION AREA

Sec. 460kk. Establishment

- (a) Findings
The Congress finds that -
 - (1) there are significant scenic, recreational, educational, scientific, natural, archeological, and public health benefits provided by the Santa Monica Mountains and adjacent coastline area;
 - (2) there is a national interest in protecting and preserving these benefits for the residents of and visitors to the area; and
 - (3) the State of California and its local units of government have authority to prevent or minimize adverse uses of the Santa Monica Mountains and adjacent coastline area and can, to a great extent, protect the health, safety, and general welfare by the use of such authority.
- (b) Establishment; management
There is hereby established the Santa Monica Mountains National Recreation Area (hereinafter referred to as the "recreation area"). The Secretary shall manage the recreation area in a manner which will preserve and enhance its scenic, natural, and historical setting and its public health value as an airshed for the Southern California metropolitan area while providing for the recreational and educational need of the visiting public.
- (c) Description; boundary revisions: notice to Congressional committees, publication in Federal Register; acquisition of property: manner, transfer from Federal agency to administrative jurisdiction of Secretary, exchange of lands with city of Los Angeles, development of municipal cultural resource management program; Nike Site transfer to Secretary
 - (1) The recreation area shall consist of the lands and waters and interests generally depicted as the recreation area on the map entitled "Boundary Map, Santa Monica Mountains National Recreation Area, California, and Santa Monica Mountains Zone", numbered SMM-NRA 80,000, and dated May 1978, which shall be on file and available for inspection in the offices of the National Park Service, Department of the Interior, Washington, District of Columbia, and in the offices of the General Services Administration in the Federal Office Building in West Los Angeles, California, and in the main public library in Ventura, California. After advising the Committee on Natural Resources of the United States House of Representatives and the Committee on Energy and Natural Resources of the United States Senate, in writing, the Secretary may make minor revisions of the boundaries of the recreation area when necessary by publication of a revised drawing or other boundary description in the Federal Register.
 - (2)
 - (A) Not later than ninety days after November 10, 1978, the Secretary, after consultation with the Governor of the State of California, the California Coastal Commission, and the Santa Monica Mountains Comprehensive Planning Commission, shall commence acquisition of lands, improvements, waters, or interests therein within the recreation area. Such acquisition may be by donation, purchase with donated or appropriated funds, transfer from any Federal agency, exchange, or otherwise. Except as provided in subparagraph (B), any lands or interests therein owned by the State of California or any



political subdivision thereof (including any park district or other public entity) may be acquired only by donation, except that such lands acquired after November 10, 1978, by the State of California or its political subdivisions may be acquired by purchase or exchange if the Secretary determines that the lands were acquired for purposes which further the national interest in protecting the area and that the purchase price or value on exchange does not exceed fair market value on the date that the State acquired the land or interest: Provided, however, That the value of any lands acquired by the Secretary under the exception in this sentence shall be deducted from the amount of moneys available for grants to the State under subsection (n) of this section. Notwithstanding any other provision of law, any Federal property located within the boundaries of the recreation area shall, with the concurrence of the head of the agency having custody thereof, be transferred without cost, to the administrative jurisdiction of the Secretary for the purposes of the recreation area.

- (B) The Secretary shall negotiate, and carry out, and exchange with the city of Los Angeles (acting through its department of water and power) of ⁽¹⁾ certain federally owned lands managed by the Bureau of Land Management in the vicinity of the Haiwee Reservoir in Inyo County for certain lands owned by the city of Los Angeles which are associated with the Upper Franklin Reservoir in the city of Los Angeles. Lands acquired by the Secretary pursuant to such exchange shall be transferred without cost to the administrative jurisdiction of the National Park Service for inclusion within the recreation area. The Secretary shall include in such exchange a provision for an easement to be granted to the city of Los Angeles for the existing water pipeline associated with the Upper Franklin Reservoir and for the city of Los Angeles to provide for replacement water to maintain the water elevations of the Franklin Reservoir to the current levels. The values of lands exchanged under this provision shall be equal, or shall be equalized, in the same manner as provided in section 1716 of title 43.
- (C) The city shall assume full responsibility for the protection of cultural resources and shall develop a cultural resource management program for the public lands to be transferred to the city in the vicinity of the Haiwee Reservoir. The program shall be developed in consultation with the Secretary of the Interior, the California State Historic Preservation Officer, and the Advisory Council on Historic Preservation.
- (3) The Administrator of the General Services Administration is hereby authorized and directed to transfer the site generally known as Nike Site 78 to the Secretary for inclusion in the recreation area: Provided, That the county of Los Angeles shall be permitted to continue to use without charge the facilities together with sufficient land as in the determination of the Secretary shall be necessary to continue to maintain and operate a fire suppression and training facility and shall be excused from payment for any use of the land and facilities on the site prior to November 10, 1978. At such time as the county of Los Angeles, California, relinquishes control of such facilities and adjacent land or ceases the operation of the fire suppression and training facility, the land and facilities shall be managed by the Secretary as a part of the recreation area.
- (d) Identification and revision of areas: public ownership for critical purposes; land and area plan: submission to Congressional committees
 - (1) Within six months after November 10, 1978, the Secretary shall identify the lands, waters, and interests within the recreation area which must be acquired and held in public ownership for the following critical purposes: preservation of beaches and coastal uplands; protection of undeveloped inland stream drainage basins; connection of existing State and local government parks and other publicly owned lands to enhance their potential for public recreation use; protection of existing park roads and scenic corridors, including such right-of-way as is necessary for the protection of the Mulholland Scenic Parkway Corridor; protection of the public health and welfare; and development and interpretation of historic sites and recreation areas in connection therewith, to include, but not be limited to, parks, picnic areas, scenic overlooks, hiking trails, bicycle trails, and equestrian trails. The Secretary may from time to time revise the identification of such areas, and any such revisions shall become effective in the same manner as herein provided for revisions in the boundaries of the recreation area.

- (2) By January 1, 1980, the Secretary shall submit, in writing, to the committees referred to in subsection (c) of this section and to the Committees on Appropriations of the United States Congress a detailed plan which shall indicate -
 - (A) the lands and areas identified in paragraph (1),
 - (B) the lands which he has previously acquired by purchase, donation, exchange, or transfer for the purpose of this recreation area,
 - (C) the annual acquisition program (including the level of funding) recommended for the ensuing five fiscal years, and
 - (D) the final boundary map for the recreation area.
- (e) Improved property and scenic easement acquisitions
With respect to improved properties, as defined in this section, fee title shall not be acquired unless the Secretary finds that such lands are being used, or are threatened with uses, which are detrimental to the purposes of the recreation area, or unless each acquisition is necessary to fulfill the purposes of this section. The Secretary may acquire scenic easements to such improved property or such other interests as, in his judgment are necessary for the purposes of the recreation area.
- (f) "Improved property" defined
For the purposes of this section, the term "improved property" means -
 - (1) a detached single-family dwelling, the construction of which was begun before January 1, 1978 (hereafter referred to as "dwelling"), together with so much of the land on which the dwelling is situated as is in the same ownership as the dwelling and as the Secretary designates to be reasonably necessary for the enjoyment of the dwelling for the sole purpose of noncommercial residential use, together with any structures necessary to the dwelling which are situated on the land so designated, and
 - (2) property developed for agricultural uses, together with any structures accessory thereto as were used for agricultural purposes on or before January 1, 1978. In determining when and to what extent a property is to be treated as "improved property" for purposes of this section, the Secretary shall take into consideration the manner of use of such buildings and lands prior to January 1, 1978, and shall designate such lands as are reasonably necessary for the continued enjoyment of the property in the same manner and to the same extent as existed prior to such date.
- (g) Owner's reservation of right of use and occupancy for fixed term of years or life; election of term; fair market value; termination; notification
The owner of an improved property, as defined in this section, on the date of its acquisition, as a condition of such acquisition, may retain for herself or himself, her or his heirs and assigns, a right of use and occupancy of the improved property for noncommercial residential or agriculture purposes, as the case may be, for a definite term of not more than twenty-five years, or, in lieu thereof, for a term ending at the death of the owner or the death of her or his spouse, whichever is later. The owner shall elect the term to be reserved. Unless the property is wholly or partially donated, the Secretary shall pay to the owner the fair market value of the property on the date of its acquisition, less the fair market value on that date of the right retained by the owner. A right retained by the owner pursuant to this section shall be subject to termination by the Secretary upon his determination that it is being exercised in a manner inconsistent with the purposes of this section, and it shall terminate by operation of law upon notification by the Secretary to the holder of the right of such determination and tendering to him the amount equal to the fair market value of that portion which remains unexpired.
- (h) Hardship sale offers
In exercising the authority to acquire property under this section, the Secretary shall give prompt and careful consideration to any offer made by an individual owning property within the recreation area to sell such property, if such individual notifies the Secretary that the continued ownership of such property is causing, or would result in, undue hardship.



- (i) **Administration**
The Secretary shall administer the recreation area in accordance with this Act and provisions of laws generally applicable to units of the National Park System, including sections 1, 2, 3, and 4 of this title. In the administration of the recreation area, the Secretary may utilize such statutory authority available for the conservation and management of wildlife and natural resources as appropriate to carry out the purpose of this section. The fragile resource areas of the recreation area shall be administered on a low-intensity basis, as determined by the Secretary.
 - (j) **Cooperative agreements for rescue, fire prevention and firefighting, and law enforcement services**
The Secretary may enter into cooperative agreements with the State of California, or any political subdivision thereof, for the rendering, on a reimbursable basis, of rescue, firefighting, and law enforcement services and cooperative assistance by nearby law enforcement and fire preventive agencies.
 - (k) **Donations**
Notwithstanding any other provision of law, the Secretary is authorized to accept donations of funds, property, or services from individuals, foundations, corporations, or public entities for the purpose of land acquisition and providing services and facilities which the Secretary deems consistent with the purposes of this section.
 - (l) **Report of Advisory Commission to Secretary**
By January 1, 1981, the Santa Monica Mountains National Recreation Area Advisory Commission, established by this section, shall submit a report to the Secretary which shall -
 - (1) assess the capability and willingness of the State of California and the local units of government to manage and operate the recreation area,
 - (2) recommend any changes in ownership, management, and operation which would better accomplish the purposes of this section, and
 - (3) recommend any conditions, joint management agreements, or other land use mechanisms to be contingent on any transfer of land.
 - (m) **Report of Secretary to Congressional committees**
The Secretary, after giving careful consideration to the recommendations set forth by the Advisory Commission, shall, by January 1, 1982, submit a report to the committees referred to in subsection (c) of this section which shall incorporate the recommendations of the Advisory Commission as well as set forth the Secretary's recommendations. Such report shall -
 - (1) assess the benefits and costs of continued management as a unit of the National Park System,
 - (2) assess the capability and willingness of the State of California and the local units of government to manage and operate the recreation area, and
 - (3) recommend any changes in ownership, management, and operation which would better accomplish the purposes of this section.
 - (n) **Comprehensive plan; contents; approval considerations; environmental consultations; grants and funds; assurance and grant requirements; plan changes; liability for reimbursement of funds; approval by Secretary**
 - (1) The Secretary shall request the Santa Monica Mountains Comprehensive Planning Commission to submit a comprehensive plan, prepared in accord with this section and title 7.75 of the California Government Code (commencing with section 67450), for the Santa Monica Mountains Zone generally depicted on the map referred to in subsection (c) of this section for approval.
 - (2) The comprehensive plan shall include, in addition to the requirements of California State law -

- (A) an identification and designation of public and private uses which are compatible with and which would not significantly impair the significant scenic, recreational, educational, scientific, natural, archeological, and public health benefits present in the zone and which would not have an adverse impact on the recreation area or on the air quality of the south coast air basin;
- (B) a specific minimum land acquisition program which shall include, but not be limited to, fee and less than fee acquisition of strategic and critical sites not to be acquired by the Federal Government for public recreational and other related uses; and a program for the complementary use of State and local authority to regulate the use of lands and waters within the Santa Monica Mountains Zone to the fullest extent practicable consistent with the purposes of this section; and
- (C) a recreation transportation system which may include but need not be limited to existing public transit.
- (3) No plan submitted to the Secretary under this section shall be approved unless the Secretary finds the plan consistent with paragraph (2) and finds that -
 - (A) the planning commission has afforded adequate opportunity, including public hearings, for public involvement in the preparation and review of the plan, and public comments were received and considered in the plan or revision as presented to him;
 - (B) the State and local units of government identified in the plan as responsible for implementing its provisions have the necessary authority to implement the plan and such State and local units of government have indicated their intention to use such authority to implement the plan;
 - (C) the plan, if implemented, would preserve significant natural, historical, and archeological benefits and, consistent with such benefits, provide increased recreational opportunities for persons residing in the greater Los Angeles-southern California metropolitan area; and
 - (D) implementation of the plan would not have a serious adverse impact on the air quality or public health of the greater Los Angeles region. Before making his findings on the air quality and public health impacts of the plan, the Secretary shall consult with the Administrator of the Environmental Protection Agency.
- (4) Following approval of the plan with respect to the Santa Monica Mountains Zone, upon receipt of adequate assurances that all aspects of that jurisdiction's implementation responsibilities will be adopted and put into effect, the Secretary shall -
 - (A) provide grants to the State and through the State to local governmental bodies for acquisition of lands, waters, and interests therein identified in paragraph (2)(B), and for development of essential public facilities, except that such grants shall be made only for the acquisition of lands, waters, and interests therein, and related essential public facilities, for park, recreation, and conservation purposes; and
 - (B) provide, subject to agreements that in the opinion of the Secretary will assure additional preservation of the lands and waters of the zone, such funds as may be necessary to retire bonded indebtedness for water and sewer and other utilities already incurred by property owners which in the opinion of the Secretary would if left outstanding contribute to further



development of the zone in a manner inconsistent with the approved plan developed by the planning commission. No grant for acquisition of land may be made under subparagraph (A) unless the Secretary receives satisfactory assurances that such lands acquired under subparagraph (A) shall not be converted to other than park, recreation, and conservation purposes without the approval of the Secretary and without provision for suitable replacement land.

- (5) Grants under this section shall be made only upon application of the recipient State and shall be in addition to any other Federal financial assistance for any other program, and shall be subject to such terms and conditions as the Secretary deems necessary to carry out the purposes of this section. Any jurisdiction that implements changes to the approved plan which are inconsistent with the purposes of this section, or adopts or acquiesces in changes to laws¹²¹ regulations or policies necessary to implement or protect the approved plan, without approval of the Secretary, may be liable for reimbursement of all funds previously granted or available to it under the terms of this section without regard to such additional terms and conditions or other requirements of law that may be applicable to such grants. During the life of the planning commission, changes to the plan must be submitted by the planning commission to the Secretary for approval. No such application for a grant may be made after the date five years from the date of the Secretary's approval of the plan.
- (o) Comments on undertakings prior to expenditure of Federal funds or issuance of licenses or permits
The head of any Federal agency having direct or indirect jurisdiction over a proposed Federal or federally assisted undertaking in the lands and waters within the Santa Monica Mountains Zone, generally depicted on the map referred to in subsection (c) of this section, and the head of any Federal agency having authority to license or permit any undertaking in such lands and waters shall, prior to the approval of the expenditure of any Federal funds on such undertaking or prior to the issuance of any license or permit, as the case may be, afford the Secretary a reasonable opportunity to comment with regard to such undertaking and shall give due consideration to any comments made by the Secretary and to the effect of such undertaking on the "findings" and purposes of this section.
- (p) State agency recommendations; consideration
The Secretary shall give full consideration to the recommendations of the California Department of Parks and Recreation, the Santa Monica Mountains Comprehensive Planning Commission, and the California Coastal Commission.
- (q) Advisory Commission; establishment and termination; membership; term; meetings; notice, publication in newspapers; compensation and expenses; consultations of Secretary with Commission
 - (1) There is hereby established the Santa Monica Mountains National Recreation Area Advisory Commission (hereinafter referred to as the "Advisory Commission"). The Advisory Commission shall terminate ten years after the date of establishment of the recreation area.
 - (2) The Advisory Commission shall be composed of the following members to serve for terms of five years as follows:
 - (A) one member appointed by the Governor of the State of California;
 - (B) one member appointed by the mayor of the city of Los Angeles;
 - (C) one member appointed by the Board of Supervisors of Los Angeles County;
 - (D) one member appointed by the Board of Supervisors of Ventura County; and
 - (E) nine members appointed by the Secretary, one of whom shall serve as the Commission Chairperson.

- (3) The Advisory Commission shall meet on a regular basis. Notice of meetings and agenda shall be published in local newspapers which have a distribution which generally covers the area. Commission meetings shall be held at locations and in such a manner as to insure adequate public involvement. Such locations shall be in the region of the Santa Monica Mountains and no more than twenty-five miles from it.
- (4) Members of the Commission shall serve without compensation as such, but the Secretary may pay expenses reasonably incurred in carrying out their responsibilities under this Act on vouchers signed by the Chairperson.
- (5) The Secretary, or his or her designee, shall from time to time but at least semiannually, meet and consult with the Advisory Commission on matters relating to the development of this recreation area and with respect to carrying out the provisions of this section.
- (r) Authorization of appropriations for property acquisitions and State grants
There are authorized to be appropriated such sums as may be necessary for acquisition of lands and interests in land within the boundaries of the recreation area established under this section, but not more than \$15,000,000 for fiscal year 1979, \$40,000,000 for fiscal year 1980, \$45,000,000 for fiscal year 1981, \$10,000,000 for fiscal year 1982, and \$15,000,000 for fiscal year 1983, such sums to remain available until expended. For grants to the State pursuant to subsection (n) of this section there are authorized to be appropriated not more than \$10,000,000 for fiscal year 1979, \$10,000,000 for fiscal year 1980, \$5,000,000 for fiscal year 1981, and \$5,000,000 for fiscal year 1982, such sums to remain available until expended. For the authorizations made in this subsection, any amounts authorized but not appropriated in any fiscal year shall remain available for appropriation in succeeding fiscal years.
- (s) Authorization of appropriations for public facilities development
For the development of essential public facilities in the recreation area there are authorized to be appropriated not more than \$500,000. The Congress expects that, at least until assessment of the report required by subsection (t) of this section, any further development of the area shall be accomplished by the State of California or local units of government, subject to the approval of the Director, National Park Service.
- (t) General management plan; transmission to Congressional committees
Within two years from the date of establishment of the recreation area pursuant to this section, the Secretary shall, after consulting with the Advisory Commission, develop and transmit to the Committees referred to in subsection (c) of this section a general management plan for the recreation area consistent with the objectives of this section. Such plan shall indicate -
 - (1) a plan for visitor use including the facilities needed to accommodate the health, safety, education and recreation needs of the public;
 - (2) the location and estimated costs of all facilities;
 - (3) the projected need for any additional facilities within the area;
 - (4) any additions or alterations to the boundaries of the recreation area which are necessary or desirable to the better carrying out of the purposes of this section; and
 - (5) a plan for preservation of scenic, archeological and natural values and of fragile ecological areas.

Footnotes

[1] So in original.

[2] So in original. Probably should be followed by a comma.

Table 2

 NATIONAL PARK SERVICE GENERAL AGREEMENTS WITH OTHER AGENCIES AND ORGANIZATIONS	
Principal Party to Agreement	General Purpose of Agreement
Los Angeles Conservation Corps	Agreement to provide youth conservation crews to maintain park facilities
California Conservation Corps	Agreement to provide youth conservation crews to maintain park facilities
William O. Douglas Outdoor Classroom	Agreement to operate facilities at WODOC for environmental education purposes
Friends of Satwiwa	Agreement to use facilities at Satwiwa for Native American Indian programs
Friends of Satwiwa Guest Host Program	Agreement to use facilities at Satwiwa for Guest Host interpretive programs
Los Angeles Unified School District	Agreement to provide environmental education programs
Santa Monica Mountains Fund	Agreement to support funding programs for environmental education programs, and capital improvements to park facilities
Southwest Parks and Monuments Association	Agreement with NPS to support book sales and interpretation at certain parks
California Round Table on Parks, Recreation and Tourism	Agreement with the Pacific West Region to cooperate in the planning and promotion of recreation in California
State Parks and Conservancy	Agreement to collaborate on park operations
Point Mugu Naval Air Weapons Station	Formalizes NPS interest in Mugu Lagoon
Santa Monica Mountains and Seashore Foundation	Agreement to collaborate on cultural resource protection
Resource Conservation District of the Santa Monica Mountains	Agreement to cooperate in various resource planning, restoration and education projects in the SMMNRA
Ventura County Fire Department	Agreement to collaborate on fire protection programs on national park lands in SMMNRA
Los Angeles County Fire Department	Agreement to collaborate on fire protection programs on national park lands in SMMNRA
U.S. Forest Service, Angeles National Forest	Agreement to provide dispatch radio services for NPS operations in the SMMNRA
California Department of Forestry	Agreement to collaborate on fire protection programs on national park lands in SMMNRA
Ventura County Sheriff's Department	Agreement to operate Search and Rescue radio repeater on NPS property at Conejo Peak
U.S. Geological Survey	Agreement to maintain a seismology station at Simi Peak

Table 3

	NATIONAL PARK SERVICE PLANNING DOCUMENTS
Park-Wide General Plans	
<i>Santa Monica Mountains Comprehensive Plan.</i> 1979. Santa Monica Mountains Comprehensive Planning Commission, California State Parks. Plan was developed by a joint effort with the National Park Service.	
<i>Management of Parklands, Santa Monica Mountains National Recreation Area.</i> 1982. Santa Monica Mountains National Recreation Area, National Park Service, U.S. Department of the Interior.	
<i>General Management Plan, Santa Monica Mountains National Recreation Area.</i> 1982. Santa Monica Mountains National Recreation Area, National Park Service, U.S. Department of the Interior.	
<i>Final Environmental Impact Statement, General Management Plan, Santa Monica Mountains National Recreation Area.</i> 1982. Santa Monica Mountains National Recreation Area, National Park Service, U.S. Department of the Interior.	
<i>Statement for Management, Santa Monica Mountains National Recreation Area.</i> 1988. Santa Monica Mountains National Recreation Area, National Park Service, U.S. Department of the Interior.	
<i>Business Plan for Santa Monica Mountains National Recreation Area.</i> 1999. Santa Monica Mountains National Recreation Area, National Park Service, U.S. Department of the Interior.	
Area Plans	
<i>Franklin Canyon Development Concept Plan and Environmental Assessment.</i> 1982. Santa Monica Mountains National Recreation Area, National Park Service, U.S. Department of the Interior.	
<i>Paramount Ranch Development Concept Plan and Environmental Assessment.</i> 1982. Santa Monica Mountains National Recreation Area, National Park Service, U.S. Department of the Interior.	
<i>Paramount Ranch Cultural Landscape Report.</i> 1997. Santa Monica Mountains National Recreation Area, National Park Service, U.S. Department of the Interior.	
<i>Proposed Public Use Plan, Cross Mountain Park and Environmental Assessment.</i> 1982. Santa Monica Mountains National Recreation Area, National Park Service, U.S. Department of the Interior.	
<i>Mulholland Scenic Parkway Corridor: A Scenic Assessment.</i> 1984. Santa Monica Mountains National Recreational Area, National Park Service, U.S. Department of the Interior.	
<i>Rancho Sierra Vista/Satwiwa Development Concept Plan and Environmental Assessment.</i> 1984. Santa Monica Mountains National Recreation Area, National Park Service, U.S. Department of the Interior.	
<i>Decker Canyon Development Concept Plan and Environmental Impact Statement.</i> 1987. Santa Monica Mountains National Recreation, National Park Service, U.S. Department of the Interior.	
<i>Zuma-Trancas Canyons Development Concept Plan and Environmental Assessment.</i> 1993. Santa Monica Mountains National Recreation, National Park Service, U.S. Department of the Interior.	
<i>Peter Strauss Ranch Development Concept Plan and Environmental Assessment.</i> 1994. Santa Monica Mountains National Recreation, National Park Service, U.S. Department of the Interior.	
<i>Draft Circle X and Malibu Springs Schematic Design/Interpretive Prospectus and Environmental Assessment.</i> 1995. Santa Monica Mountains National Recreation, National Park Service, U.S. Department of the Interior.	
<i>Draft Simi Hills Comprehensive Design Plan and Environmental Assessment.</i> 1996. Santa Monica Mountains National Recreation Area, National Park Service, U.S. Department of the Interior.	
<i>Solstice Canyon Design Charette.</i> 1998. Santa Monica Mountains National Recreation Area, National Park Service, U.S. Department of the Interior.	



	NATIONAL PARK SERVICE PLANNING DOCUMENTS
Land Protection Plans	
<i>Land Acquisition Plan, Santa Monica Mountains National Recreation Area.</i> 1980. Santa Monica Mountains National Recreation Area, National Park Service, U.S. Department of the Interior.	
<i>Land Acquisition Plan, Santa Monica Mountains National Recreation Area.</i> 1984. Santa Monica Mountains National Recreation Area, National Park Service, U.S. Department of the Interior.	
<i>Addendum to the Land Protection Plan, Santa Monica Mountains National Recreation Area.</i> 1987, 1989 and 1991. Santa Monica Mountains National Recreation Area, National Park Service, U.S. Department of the Interior.	
<i>Proposed Land Exchange Cheeseboro Canyon/Palo Comado Canyon: Final Environmental Impact Statement.</i> 1991. Santa Monica Mountains National Recreation Area, National Park Service, U.S. Department of the Interior.	
<i>Land Protection Plan, Santa Monica Mountains National Recreation Area.</i> 1998. Santa Monica Mountains National Recreation Area National Park Service, U.S. Department of the Interior.	
Resource Management Plans	
<i>Natural Resources Management Plan and Environmental Assessment.</i> 1982. Santa Monica Mountains National Recreation Area, National Park Service, U.S. Department of the Interior.	
<i>Natural Resources Management Program: An Addendum to the Natural Resource Management Plan.</i> 1985. Santa Monica Mountains National Recreation Area, National Park Service, U.S. Department of the Interior.	
<i>Resource Management Plan.</i> 1994. Santa Monica Mountains National Recreation Area National Park Service, U.S. Department of the Interior.	
<hr/> <ul style="list-style-type: none">• (The following resource management implementation plans are detached addenda to the <i>Resource Management Plan</i>):	
<i>Fire Management Plan and Environmental Assessment.</i> 1986. Santa Monica Mountains National Recreation Area, National Park Service, U.S. Department of the Interior.	
<i>Fire Management Plan and Environmental Assessment (1994 Revision).</i> 1994. Santa Monica Mountains National Recreation Area National Park Service, U.S. Department of the Interior.	
<i>Geographic Information System Plan.</i> 1992. Santa Monica Mountains National Recreation Area National Park Service, U.S. Department of the Interior.	
<i>Natural Resources Research Prospectus.</i> 1994. Santa Monica Mountains National Recreation Area, National Park Service, U.S. Department of the Interior.	
<i>Ranch Management Plan, Rancho Sierra Vista.</i> 1994. Santa Monica Mountains National Recreation Area, National Park Service, U.S. Department of the Interior.	
<i>Potrero Creek Restoration Plan, Rancho Sierra Vista.</i> 1994. Santa Monica Mountains National Recreation Area, National Park Service, U.S. Department of the Interior.	
<i>Scope of Collections Statement.</i> 1986. Santa Monica Mountains National Recreation Area, National Park Service, U.S. Department of the Interior.	
<i>Water Resources Management Plan and Environmental Assessment.</i> 1984. Santa Monica Mountains National Recreation Area, National Park Service, U.S. Department of the Interior (being updated in 1995).	
<i>Natural Resource Research Prospectus.</i> 1994. Santa Monica Mountains National Recreation Area, National Park Service, U.S. Department of the Interior.	

 NATIONAL PARK SERVICE PLANNING DOCUMENTS	
Interpretive Plans	
<i>Interpretive Prospectus</i> . 1986. Santa Monica Mountains National Recreation Area, National Park Service, U.S. Department of the Interior (needs revision).	
<i>The Chumash: A Changing People, A Changing Land, Santa Monica Mountains NRA Environmental and Cultural Education Program</i> . 1992. Santa Monica Mountains National Recreation Area, National Park Service, U.S. Department of the Interior.	
<i>Statement for Interpretation</i> . 1993. Santa Monica Mountains National Recreation Area, National Park Service, U.S. Department of the Interior.	
<i>Wayside Exhibit Plan</i> . 1995. Santa Monica Mountains National Recreation Area, National Park Service, U.S. Department of the Interior.	
Recreational Studies and Plans	
<i>Conceptual Trail System for the Santa Monica Mountains</i> . 1979. Santa Monica Mountains National Recreation Area, National Park Service, U. S. Department of the Interior.	
<i>Existing Recreational Use</i> . 1980. Santa Monica Mountains National Recreation Area, National Park Service, U.S. Department of the Interior.	
<i>Potential Visitor Use of Urban Minority and Handicapped Populations</i> . 1981. Santa Monica Mountains National Recreation area, National Park Service, U.S. Department of the Interior.	
<i>Trail Acquisition Information</i> . 1984, Santa Monica Mountain National Recreational Area, National Park Service, U.S. Department of the Interior.	
<i>Visitor Services Project, Santa Monica Mountains National Recreation Area</i> . 1993. National Park Service, U.S. Department of the Interior, Visitor Services Project Report 55, Cooperative Park Studies Unit, University of Idaho, Moscow.	
<i>Museum Management Plan</i> . 1999. Santa Monica Mountains National Recreation Area, National Park Service, U.S. Department of the Interior.	
<i>Santa Monica Mountains Area Recreational Trails Coordination Project (SMMART) Final Summary Report</i> . 1997. Rivers, Trails and Conservation Assistance Program, National Park Service, U.S. Department of the Interior.	
Other Environmental Planning Documents	
<i>Cheeseboro Canyon/Palo Comado Canyon Proposed Land Exchange Environmental Impact Statement</i> . 1991. Santa Monica Mountains National Recreation Area, National Park Service, U.S. Department of the Interior.	
<i>Environmental Assessment, Engineering Modifications to Decrease Flood Hazard of Rocky Oaks Dam</i> . 1996. Santa Monica Mountains National Recreation Area, National Park Service, U.S. Department of the Interior.	
<i>Calabasas Landfill Special Use Permit Environmental Assessment</i> . 1998. Santa Monica Mountains National Recreation Area, National Park Service, U.S. Department of the Interior.	
<i>Circle X Environmental Assessment and Finding of No Significant Impact</i> . 1999. Santa Monica Mountains National Recreation Area, National Park Service, U.S. Department of the Interior.	



Table 4

CALIFORNIA STATE PARKS PLANNING DOCUMENTS	
Plans Under Development	
Point Dume State Beach	The CSP Southern Service Center would prepare a management plan for the bluff top area that would include a proposed carrying capacity for the site.
Malibu Lagoon State Beach	A Historic Landscape Management Plan for the Adamson House Grounds (under development) A Lagoon Water Level Management Plan (under development) Plans for the Restoration and Use of the Malibu Pier (under development)
Will Rogers State Historic Park	A Historic Landscape Management Plan (under development)
Future Planning Efforts	
Point Dume State Beach	Possible reclassification to a State Reserve
Point Mugu State Park	Possible boundary changes to wilderness and preserve subclassifications
Malibu Creek State Park	Possible classification (or subclassification) of Tapia Park Possible general plan amendment to address: <ul style="list-style-type: none"> • Tapia Park • White Oak Farm • Malibu Canyon • Reagan Ranch
Malibu Lagoon State Beach	Possible reclassification and subclassifications Possible general plan amendment to address: <ul style="list-style-type: none"> • Malibu Bluffs • Malibu Canyon • Watershed Management

Table 5

SMMNRA CULTURAL LANDSCAPE INVENTORY (Partial listing)		
Landscape	National Register Status	Component Landscapes
Santa Monica Mountains Chumash/Tongva Ethnographic District	Potentially Significant	Satwiwa/Boney Saddlerock/Point Dume/Paradise Cove Saddle Peak Muwu/Calleguas Creek/Satwiwa Shrine Humaliwu/Talapop/Medea Creek Castle Peak/El Escorpion Burro Flats Seminole Hot Springs Upper Topanga Whales Eye
Rancho Sierra Vista	Potentially Significant	Ranch Center North Ranch Center
Solstice Canyon	Potentially Significant	Keller House Tropical Terrace Ruins
Simi Hills Historic Ranching District	Potentially Significant	Cheeseboro Canyon Morrison Ranch
Franklin Canyon	Potentially Significant	(none)
Reagan Ranch	Undetermined	(none)
Peter Strauss Ranch	Draft Nomination Prepared 2/94	(none)
Paramount Ranch	Determined Eligible 6/8/94	(none)
De Anza Trail	Determined Significant	(none)
Mason Homestead	Potentially Eligible	(none)
Stunt Ranch Homestead	Potentially Eligible	(none)
Topanga Canyon	Potentially Eligible	(none)
General Threats to Cultural Landscapes		
<p>General threats to cultural landscapes include structural deterioration, park development and operations, neglect, vandalism, and the impact of visitors. For example, historic and prehistoric artifacts such as antique nails and equipment parts, building debris and stone tools, all of which help to define the context for a cultural landscape, might be picked up by visitors. The effects of neglect and structural deterioration on landscape features could result from failure to maintain these features that are subject to the natural processes of aging and decay. Wooden fences, for example, would deteriorate from long-term exposure to the elements. Historic vegetation would eventually disappear as part of its natural life cycle. Therefore, features such as historic orchards would need to be maintained or replanted. Park operations could negatively impact historic trails and roads as they are converted to other uses or obliterated for other purposes.</p> <p>When strategic considerations of these threats are incorporated into long-term management plans, they could help reduce the deterioration of the cultural landscape over time and enhance the quality of the landscape's contribution to the park environment.</p>		



**SMMNRA CULTURAL LANDSCAPE INVENTORY
(Partial listing)**

The Nature of Cultural Landscapes in the SMMNRA

Within the Santa Monica Mountains National Recreation Area, the National Park Service owns lands or intends to acquire interests in lands that contain 29 cultural landscapes that are listed, eligible, or appear to be potentially eligible for listing on the National Register of Historic Places (NRHP). As the CLI progresses, identification and assessment of cultural landscapes in the park would be updated and refined.

Cultural landscapes within NPS-owned/managed lands in Santa Monica Mountains National Recreation Area could be identified by their connection with particular historic land uses that revolve around general themes of the National Park Service Thematic Framework (1996). The indigenous Chumash and Gabrielino/Tongva peoples have occupied the lands of the Santa Monica Mountains since prehistoric times. During the 19th century, farms and cattle ranches were established in the area, and in the 20th century, the Santa Monica Mountains down to the coast were built up for recreational and commercial uses. Each cultural landscape contains component features that include barns, corrals and fences, farmhouses, archeological sites, roads and trails, water-management structures, introduced vegetation and landscaping. Ethnographic landscapes in the park include natural features such as traditionally used plants, and sacred sites that were important in the lives of native inhabitants of the past, and are still used today. All of these landscape features possess tangible evidence of the activities and habits of the people who occupied, developed, used and shaped the land to serve their needs. The dynamic processes of landscape evolution in the Santa Monica Mountains region have resulted in physical and temporal overlap of a variety of cultural landscapes.

Individual Landscape Descriptions*

Landscape Name:	Rancho Sierra Vista
Landscape Type:	Historic Vernacular Landscape
Historic Context:	Developing the American Economy, Expressing Cultural Values
Period of Significance:	1936 – 1946
Area of Significance:	Agriculture, Conservation, Architecture

Importance:

The area covered by Rancho Sierra Vista has been used for agriculture since the mid-1800s. Uses have progressed from raising livestock to farming grain to harvesting lemon and avocado orchards in the 20th century. It has recently been used as a horse ranch. The ranch contains distinctive buildings from the 1930s – 1940s era, along with remnants of the historic lemon orchard, eucalyptus, and pastures. The Beale water management structures have survived, and many of the original roads still exist. It is a potentially significant cultural landscape as a good example of a typical Los Angeles ranch from the 1930s and 1940s.

Threats:

Structural deterioration, destructive eucalyptus, and conflicting management priorities potentially exist between restoration of the natural community vs. the cultural landscape.

* NOTE: Historic contexts according to NPS thematic framework (1996); Areas of Significance according to National Register Guidelines.



SMMNRA CULTURAL LANDSCAPE INVENTORY
(Partial listing)

Individual Landscape Descriptions* (cont'd)	
Landscape Name:	Peter Strauss Ranch
Landscape Type:	Historic Designed Landscape
Historic Context:	Creating Social Institutions and Movements
Period of Significance:	1926 – 1950
Area of Significance:	Entertainment, Recreation
Importance:	
<p>What is now known as the Peter Strauss Ranch began as a cultural landscape devoted to recreation since the mid-19th century, when residents from the San Fernando Valley would visit the area. During the 20th century, the 64.32-acre site was designed as the country retreat of famous racing car designer, Harry A. Miller. Miller added a gate tower, aviary and petting zoo, horse trails and a fruit orchard. During the 1930s through the post WWII years, the property was further developed as the Lake Enchanto amusement park. Additional landscape elements that were designed for the park included a large circular swimming pool, stone terraced hillside, outdoor terrazzo dance floor, amusement rides, a pony barn, and small buildings that comprised a children's mock "western" town. The hiking and horse trails system was also expanded, and a dam was built across Triunfo Creek to create Lake Enchanto. Parking lots were constructed along with picnicking facilities. Lake Enchanto was a popular amusement park well into the 1950s, at which time Disneyland rose in popularity.</p>	
Threats:	
<p>Structural deterioration and neglect, lack of professional expertise to evaluate resources and conflicting management priorities potentially exist between restoration of the natural community vs. the cultural landscape.</p>	
Landscape Name:	Cheeseboro and Palo Comado Canyons
Landscape Type:	Historic Vernacular Landscape
Historic Context:	Developing the American Economy, Expressing Cultural Values
Period of Significance:	1824 – 1920
Area of Significance:	Agriculture
Importance:	
<p>Cheeseboro and Palo Comado Canyons were part of the Simi and Las Virgenes ranchos from California's Mexican period in the early 19th century. Ranching and the raising of livestock were well established by the mid-1860s and by the turn of the century sheep and cattle continued to graze in the hills above the canyons. The area possesses numerous cultural resources that are associated with its ranching history and may constitute a significant cultural landscape.</p>	
Threats:	
<p>Management priorities, lack of professional expertise to evaluate cultural landscape resources, adjacent urban development, and fire management practices potentially exist as threats.</p>	

* NOTE: Historic contexts according to NPS thematic framework (1996); Areas of Significance according to National Register Guidelines.



SMMNRA CULTURAL LANDSCAPE INVENTORY
(Partial listing)

Individual Landscape Descriptions* (cont'd)	
Landscape Name:	Morrison Ranch
Landscape Type:	Historic Vernacular Landscape
Historic Context:	Developing the American Economy, Expressing Cultural Values
Period of Significance:	1904 – 1920
Area of Significance:	Agriculture
Importance:	
<p>The Morrison Ranch is a component landscape in the Cheeseboro/Palo Comado Canyons historic ranching district. It was once part of the Las Virgenes land grant. In 1904, rancher John W. Morrison purchased 724 acres. He raised horses and cattle on the ranch between 1910 and 1920. It was developed as a cattle ranch prior to 1880, and was used as such well into the middle of the 20th century. The site contains the remains of a ranch house, corral, dam, fencing, rangeland, and a number of outbuildings. Morrison Ranch is an important physical link to the area's ranching past.</p>	
Threats:	
<p>Structural deterioration and neglect, inadequate visitor information, and fire management practices potentially exist as threats.</p>	
Landscape Name:	Paramount Movie Ranch
Landscape Type:	Historic Vernacular Landscape
Historic Context:	Expressing Cultural Values
Period of Significance:	1920 – 1945
Area of Significance:	Entertainment
Importance:	
<p>The 680-acre cultural landscape of the Paramount Movie Ranch is important as the best remaining example of a movie ranch used by the large movie studios in the 1920s, 1930s, and 1940s.</p>	
Threats:	
<p>Impacts from concessionaires, inadequate visitor information, impediments to interpretation for a quality visitor experience, inadequate visitor services at the site, and development by filming concessionaires potentially exist as threats.</p>	

* NOTE: Historic contexts according to NPS thematic framework (1996); Areas of Significance according to National Register Guidelines.



SMMNRA CULTURAL LANDSCAPE INVENTORY
(Partial listing)

Individual Landscape Descriptions* (cont'd)	
Landscape Name:	Chumash Archaeological District
Landscape Type:	Ethnographic Landscape
Historic Context:	Peopling Places – Western Archaic Adaptations/Prehistoric Settlements and Settlement Patterns, Ethnohistory of Indigenous American Populations/Native Cultural Adaptations at Contact
Period of Significance:	
Area of Significance:	Archeology
Importance:	
A potentially significant ethnographic landscape exists in the Santa Monica Mountains that has been determined as traditionally important by the Gabrielino/Tongva and Chumash tribes. Locations of primary importance are situated between Point Mugu and Malibu. Heavy concentrations of prehistoric archeological sites are part of this landscape, and have been important to indigenous peoples since the mission days in the 18th century.	
Threats:	
Fire management practices, adjacent urban development, and visitation pose potential threats.	
Landscape Name:	Franklin Canyon
Landscape Type:	Historic Vernacular Landscape
Historic Context:	Developing the American Economy
Period of Significance:	
Area of Significance:	Agriculture, Conservation, Engineering
Importance:	
Franklin Canyon contains a cultural landscape that is potentially significant for its association with the Doheny family who developed the canyon for agriculture with the Department of Water and Power.	
Threats:	
Fire management, adjacent urban development, and lack of cultural landscape expertise for property inventory and evaluation exists as potential threats.	
Landscape Name:	Solstice Canyon
Landscape Type:	Historic Vernacular Landscape
Historic Context:	Peopling Places
Period of Significance:	1850
Area of Significance:	Agriculture, Conservation, Engineering
Importance:	
Solstice Canyon contains a stone house believed to be the oldest structure in the Santa Monica Mountains National Recreation Area.	

* NOTE: Historic contexts according to NPS thematic framework (1996); Areas of Significance according to National Register Guidelines.



SMMNRA CULTURAL LANDSCAPE INVENTORY (Partial listing)			
Priorities for CLI Work			
<ul style="list-style-type: none"> • <u>Chumash Archaeological District – Level I CLI and Ethnographic Assessment</u>: to determine important landscape characteristics. • <u>Rancho Sierra Vista – Level I CLI</u>: In light of the <i>Ranch Management Plan</i> for Rancho Sierra Vista, inventory work is suggested to determine its potential significance as a cultural landscape. • <u>Peter Strauss Ranch – Level I CLI</u>: In light of the <i>Development Concept Plan</i> of 1994, the property should be reassessed for its potential significance as a cultural landscape. • <u>Cheeseboro and Palo Comado Canyons – Level I CLI</u>: Cheeseboro and Palo Comado Canyons should be inventoried to identify cultural landscape values. • <u>Morrison Ranch – Level I CLI</u>: The comprehensive design plan for the Simi Hills (August 1996) recommends an in-depth cultural landscape field survey be conducted in the Cheeseboro/Palo Comado Canyons to identify landscapes associated with the ranching history. Morrison Ranch, a component of this landscape, may be an important interpretive facet for the development of this area for visitors. • <u>Paramount Movie Ranch</u>: Data entry should be made into Cultural Landscapes Automated Information Management System. • <u>Franklin Canyon – Level I CLI</u>: Inventory should be done to identify all cultural landscape values and make a preliminary judgement with regards to historic integrity of the landscape. • <u>Solstice Canyon – Level I CLI</u>: Inventory work should be conducted to determine if there is a cultural landscape associated with the historic building. 			
Related Documentation Reviewed			
<table style="width: 100%; border: none;"> <tr> <td style="vertical-align: top; width: 50%;"> <ul style="list-style-type: none"> • <i>Draft/Final EIS supplement (1982)</i> • <i>Environmental Assessment (Simi Hills 1996)</i> • <i>Archaeological Studies Report</i> • <i>Administrative History</i> • <i>Historical Overview</i> • <i>General Management Plan</i> • <i>Archaeological Base Map</i> • <i>Fire Management Plan</i> • <i>Cultural Resource Study</i> • <i>Resource Management Plan (1994)</i> • <i>Historic Structure Report</i> • <i>Historic Resource Study (HRS)</i> • <i>Statement for Management</i> • <i>Special Resource Management Plan (for Rancho Sierra Vista)</i> </td> <td style="vertical-align: top; width: 50%;"> <ul style="list-style-type: none"> • <i>Cultural Resource Management Plan</i> • <i>Special Resource Study (Rancho Sierra Vista)</i> • <i>Vegetation Management Plan</i> • <i>Ethnographic Assessment Study</i> • <i>Genealogy Study by M. Crespi</i> • <i>List of Classified Structures</i> • <i>National Register Nomination forms</i> • <i>Interpretive Prospectus</i> • <i>Superintendent's Annual Report</i> • <i>HABS/HAER</i> • <i>Land Protection Plan</i> • <i>Cultural Landscape Report</i> • <i>Other</i> • <i>Development Concept Plan (for Peter Strauss Ranch)</i> </td> </tr> </table>		<ul style="list-style-type: none"> • <i>Draft/Final EIS supplement (1982)</i> • <i>Environmental Assessment (Simi Hills 1996)</i> • <i>Archaeological Studies Report</i> • <i>Administrative History</i> • <i>Historical Overview</i> • <i>General Management Plan</i> • <i>Archaeological Base Map</i> • <i>Fire Management Plan</i> • <i>Cultural Resource Study</i> • <i>Resource Management Plan (1994)</i> • <i>Historic Structure Report</i> • <i>Historic Resource Study (HRS)</i> • <i>Statement for Management</i> • <i>Special Resource Management Plan (for Rancho Sierra Vista)</i> 	<ul style="list-style-type: none"> • <i>Cultural Resource Management Plan</i> • <i>Special Resource Study (Rancho Sierra Vista)</i> • <i>Vegetation Management Plan</i> • <i>Ethnographic Assessment Study</i> • <i>Genealogy Study by M. Crespi</i> • <i>List of Classified Structures</i> • <i>National Register Nomination forms</i> • <i>Interpretive Prospectus</i> • <i>Superintendent's Annual Report</i> • <i>HABS/HAER</i> • <i>Land Protection Plan</i> • <i>Cultural Landscape Report</i> • <i>Other</i> • <i>Development Concept Plan (for Peter Strauss Ranch)</i>
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SMMNRA CULTURAL LANDSCAPE INVENTORY
(Partial listing)

RESEARCH NEEDS*

Known

- Period of significance areas if significant
- Comparable landscapes within the region by which to assess relative integrity and significance
- Historic overview
- Pertinent mechanisms of technology
- Important events that coincide with historic occupation
- Significant people associated with the landscape
- Important land uses (historic and current uses and functions)
- Historic theme and subtheme (from NPS publication)
- Location
- Setting
- Size
- Local contexts

Needed

- Historic integrity (qualities of integrity)
- Cultural change from great events
- Ethnographic assessment study
- Associated groups
- Archeological sites (recorded sites or studies)
- Cultural values (historic and non-historic)
- Stabilization costs
- Soils analysis
- Botanical analysis
- Historic vegetation study
- Hydrology study
- Historic roads study
- Historical relationship of features
- Current regional context, including adjacent lands influence
- Regional context (physiographic, cultural, political)
- All landscape characteristics and features
- Knowledge of the physical landscape, including character defining features
- Historic legal boundaries (title searches)
- Structural history (alterations, physical changes over time, etc.)
- Significance and significance level
- Historic integrity (qualities of integrity)
- Cultural landscape history
- Important landscape processes (settlement history, economic history, technological changes, environmental changes)
- Property and occupant history
- Historic contexts needed for the recreational theme
- Historic resources study

* For all cultural landscapes except Paramount Movie Ranch, for which a Cultural Landscape Report has been prepared that includes the information below.

Table 6

LIST OF CLASSIFIED STRUCTURES		
NAME	IDLCS	Management Category*
Paramount Ranch		
Paramount Movie Ranch Fire Patrol Station	59685	B
Paramount Movie Ranch Mess-Hall-Kitchen	59681	B
Paramount Movie Ranch Prop Storage Shed	59686	B
Paramount Movie Ranch Mill Carpenter Shop	59682	B
Paramount Movie Ranch Prop Storage Shed	59684	B
Paramount Movie Ranch Livestock Barn	59683	B
Paramount Movie Ranch Equipment Storage Garage	59687	B
Paramount Movie Ranch Medea Creek Bridge	59889	B
Paramount Movie Ranch Main Roads	59691	B
Peter Strauss Ranch		
Peter Strauss Ranch Guest House	59936	B
Peter Strauss Ranch Main House	59926	B
Peter Strauss Ranch Storage Shed	59937	B
Peter Strauss Ranch Stone and Concrete Terracing	59927	B
Peter Strauss Ranch Watchtower/Gatetower	59928	B
Peter Strauss Ranch LiveOak No. 6/Boundary Marker	59931	B
Peter Strauss Ranch Entrance Arch	59932	C
Peter Strauss Ranch Swimming Pool	59933	C
Peter Strauss Ranch Water Tank	59935	B
Peter Strauss Ranch Terrazzo Dance Floor	59935	C
Peter Strauss Ranch Aviary	59939	B
Peter Strauss Ranch Amphitheater	59940	C
Peter Strauss Ranch Petting Zoo	59941	C
Peter Strauss Ranch Spillway Bulkheads/Abutments	59942	B
Peter Strauss Ranch Retaining Walls	59908	C
Rancho Sierra Vista		
Rancho Sierra Vista Barn	59748	B
Simi Hills		
Morrison Ranch House	59747	B
Solstice Canyon		
Keller House	59749	B

* Management Categories:

- Category A – Structures that **MUST** be Preserved and Maintained.
 - Category B – Structures that **SHOULD** be Preserved and Maintained.
 - Category C – Structures that **MAY** be Preserved and Maintained.
- Archaeological Sites on the National Register: Decker Canyon, Saddle Rock.

Appendixes
Cost Estimates

		COST ESTIMATE (1 of 6)
Actions Common to All Alternatives		
• Environmental Education Center at Solstice Canyon	3,500,000.	
• Complete Backbone Trail	6,000,000.	
• Rancho Sierra Vista educational facility for contemporary and Native American culture	1,173,000.	
• Coastal education center at Leo Carrillo State Park	CDPR cost	
• Staging area at Cheeseboro Canyon	4,488,000.	
• Expanded educational camp at Temescal Canyon	SMMC cost	
• Mission Canyon trailhead toilet, parking, interpretive facilities	SMMC cost	
• Solstice Canyon Steelhead Trout re-introduction	1,500,000.	
• Natural resources studies	6,520,020.	
• Cultural resources studies	656,869.	
TOTAL:	\$ 23,837,889.	

		COST ESTIMATE (2 of 6)
No Action Alternative		
• Natural resources studies (continuing operations)	\$ 6,520,020.	
• Cultural resources studies (continuing operations same as above)	656,869.	
TOTAL:	\$ 7,176,889.	

*Santa Monica Mountains National Recreation Area
GMP/EIS*

		COST ESTIMATE (3 of 6)
Preferred Alternative		
• Steelhead Trout re-introduction in Malibu Creek and Arroyo Creek watersheds (Malibu Creek will be done by the Corps of Engineers.)	\$	500,000.
• Circle X Ranch primitive overnight camp with expanded activities for group camping		350,000.
• Leo Carrillo State Park campground (rehabilitate)		CDPR cost
• Paramount Ranch Film History Education Center		4,000,000.
• White Oak Farm interpretive and educational programs		CDPR cost
• Rancho Sierra Vista barn (adaptively re-used)		450,000.
• Scenic coastal boat tour		(concession)
• Visitor/education center at Malibu Bluffs (joint funding between CDPR and NPS)		5,722,000.
• Gillette Ranch joint administration, environmental and cultural education center		2,000,000.
• Rehabilitation of 415 PCH to visitor/education center (joint project with State of California or City of Santa Monica)		2,612,260.
• Visitor Information site at LAX (exhibit design and production)		100,000.
• Expanded educational day camp facilities at WODOC		300,000.
• Visitor Information site at El Pueblo		100,000.
• Interpretive tour shuttle for scenic loop of Mulholland Highway, PCH, and Malibu Canyon Road		1,125,000.
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TOTAL:	\$	17,259,260.

		COST ESTIMATE (4 of 6)
Preservation Alternative		
• Steelhead Trout re-introduction	\$	2,500,000.
• Restore the Morrison Ranch House and cultural landscape		250,000.
• Mugu Lagoon Visitor Education Center		3,500,000.
• Rehabilitate Leo Carrillo State Park campground		CDPR cost
• Paramount Ranch Film history/administrative center		4,000,000.
• Visitor Center at Malibu Bluffs		5,722,000.
• Expanded educational day camp at WODOC		300,000.
• Circular scenic tour route (concessions)		1,125,000.
	<hr style="width: 20%; margin-left: auto; margin-right: 0;"/>	
TOTAL:	\$	17,397,000.

Appendixes
Cost Estimates

 COST ESTIMATE (5 of 6)	
Education Alternative	
• Interpretive site at Burros Flat (trails, wayside)	\$ 60,000.
• Mugu Lagoon Visitor Education center	3,500,000.
• Circle X Ranch overnight education camp costs	200,000.
• Rehabilitate campground at Leo Carrillo Beach	CDPR cost
• Decker Canyon overnight accessible environmental education camp	3,545,500.
• Peter Strauss Ranch facility improvements, parking, and circulation	744,000.
• Restoration of Morrison Ranch house and cultural landscape	250,000.
• Paramount Ranch	4,000,000.
• Rancho Sierra Vista barn (adaptively re-used)	450,000.
• Northern Gateway Visitor Education Center	6,000,000.
• Overnight education camp at Corral Canyon	530,000.
• Visitor contact at Griffith Park	100,000.
• Scenic corridor waysides	1,500,000.
• Gillette Ranch joint administration, environmental, and cultural education center	2,000,000.
• Visitor Center at Malibu Bluffs	5,722,000.
• Rehabilitation of 415 PCH to visitor/education center (joint project with State of California or City of Santa Monica)	2,612,260.
• Expanded educational day camp facilities at WODOC	300,000.
	TOTAL: \$ 31,513,760.

*Santa Monica Mountains National Recreation Area
GMP/EIS*

 COST ESTIMATE (6 of 6)	
Recreation Alternative	
• Mugu Lagoon Visitor Education Center	\$ 3,500,000.
• Circle X Ranch expanded facilities	200,000.
• Rehabilitate campground at Leo Carrillo State Park	CDPR cost
• Decker Canyon accessible overnight education camp	3,545,500.
• Paramount Ranch Film History Museum	4,000,000.
• White Oak Farm education and interpretive exhibits	CDPR cost
• Northern Gateway Visitor Center	6,000,000.
• Malibu Bluffs Visitor Education Center (joint funds from CDPR and NPS)	5,722,000.
• Scenic coastal boat tour	(concession)
• Visitor contact station at Exposition Park	100,000.
	<hr style="width: 20%; margin-left: auto; margin-right: 0;"/>
	TOTAL: \$ 23,067,500.

Table 29



HEALTH-BASED AMBIENT AIR QUALITY STANDARDS

Ozone	.08 ppm* (8-hr avg) .12 ppm (1-hr avg)	.09 ppm (1-hr avg)
Carbon Monoxide	9.0 ppm (8-hr avg) 35.0 ppm (1-hr avg)	9.0 ppm (8-hr avg)
Nitrogen Dioxide	.053 ppm (annual avg)	.25 ppm (1-hr avg)
Sulfur Dioxide	.03 ppm (annual avg) .14 ppm (24-hr avg) .5 ppm (3-hr avg)	.04 ppm (24-hr avg) .25 ppm (1-hr avg)
Lead	1.5 µg/m3** (calendar qtr)	1.5 µg/m3 (annual avg)
Particulate Matter (PM10)	50 µg/m3 (annual avg) 150 µg/m3 (24-hr avg)	30 µg/m3 (annual avg) 50 µg/m3 (24-hr avg)
Particulate Matter (PM2.5)	15 µg/m3 (annual avg) 65 µg/m3 (24-hr avg)	

* ppm = parts per million **µg/m3 = micrograms per cubic meters

Table 30



AMBIENT AIR QUALITY DESIGNATIONS

Pollutant	Ventura County		Los Angeles County	
	California	National	California	National
Ozone (one-hour)	N	N	N	N
Carbon Monoxide	N	U/A	N	N
Nitrogen dioxide	A	A	A	A
Sulfur dioxide	A	A	A	A
Particulate matter	N	N	N	N
Lead ¹	A		A	

A = Attainment N = Nonattainment T = Transitional U = Unclassified

¹ There are no areas in California which exceed the National standard for lead.



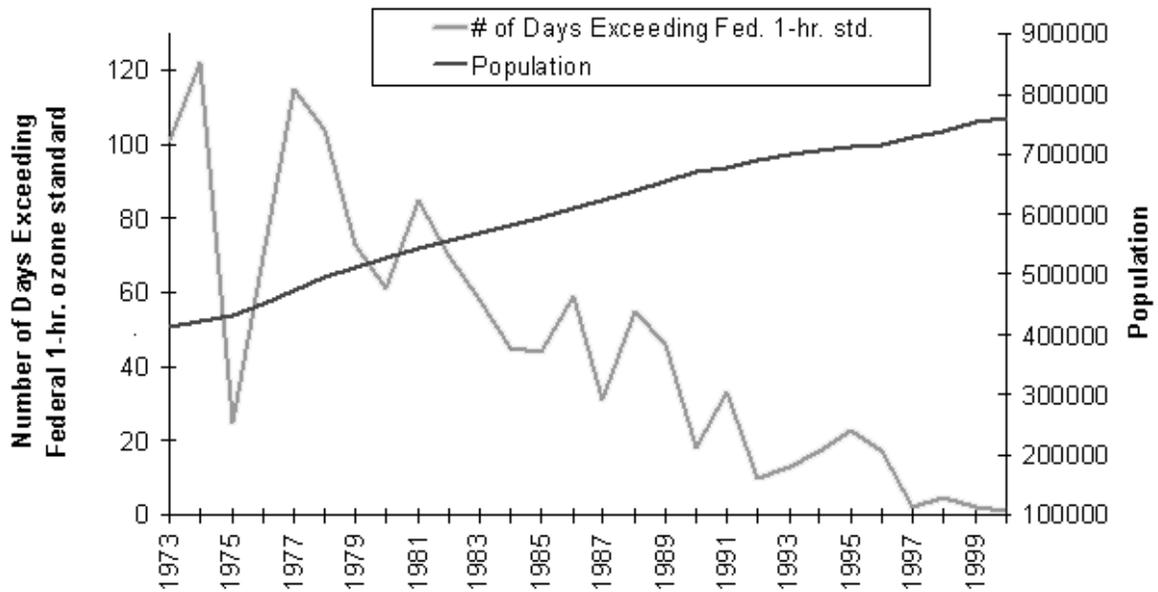


Figure 16: Ventura County Ozone Exceedances Trends 1973-1999



Figure 17: South Coast Air Basin Ozone Exceedances

Appendixes
Air Quality Tables and Figures

Table 31



**ESTIMATED 2000 ANNUAL EMISSIONS
FROM STATIONARY SOURCES**

Area	PM10 (tons/yr)	SO ₂ (tons/yr)	NO _x (tons/yr)	CO (tons/yr)	VOC (tons/yr)
Ventura County	365	146	2,190	3,285	5,110
Los Angeles County (South Coast Air Basin)	6,205	8,760	27,375	14,600	53,290
Subtotal	6,570	8,906	29,565	17,885	58,400
Santa Monica Mountains NRA*	0.2	0	0.2	2	1

* 1998 estimated annual emissions for SMMNRA

Table 32



**ESTIMATED 2000 ANNUAL EMISSIONS
FROM AREA SOURCES**

Area	PM10 (tons/yr)	SO ₂ (tons/yr)	NO _x (tons/yr)	CO (tons/yr)	VOC (tons/yr)
Ventura County	8,395	15	730	6,935	5,475
Los Angeles County (South Coast Air Basin)	59,130	146	8,395	59,130	45,260
Subtotal	67,525	161	9,125	66,065	50,735
Santa Monica Mountains NRA*	25	0.2	0.2	124	16

* 1998 estimated annual emissions for SMMNRA

Table 33



**ESTIMATED 2000 ANNUAL EMISSIONS
- MOBILE SOURCES**

Area	PM10 (tons/yr)	SO ₂ (tons/yr)	NO _x (tons/yr)	CO (tons/yr)	VOC (tons/yr)
Ventura County	1,095	3,285	24,455	137,605	14,235
Los Angeles County (South Coast Air Basin)	9,490	16,790	253,310	1,648,340	162,060
Subtotal	10,585	20,075	277,765	1,785,945	176,295
Santa Monica Mountains NRA*	1	0	1	2	.4

* 1998 estimated annual emissions for SMMNRA





United States Department of the Interior

NATIONAL PARK SERVICE
Santa Monica Mountains National Recreation Area
401 West Hillcrest Drive
Thousand Oaks, California 91360-4207

In reply refer to:
D18/GMP (SAMO)

March 25, 2002

Mr. James Raives, Federal Consistency Coordinator
California Coastal Commission
45 Fremont St., Suite 2000
San Francisco, CA 94105

Dear Mr. Raives:

We request the California Coastal Commission review the National Park Service's consistency determination for the draft General Management Plan (GMP) for the Santa Monica Mountains National Recreation Area, pursuant to Section 930.34 *et seq.* of the National Oceanic and Atmospheric Administration Federal Consistency Regulations (Title 15 Code of Federal Regulations, Part 930). To assist with your review, please find the enclosed materials:

- draft General Management Plan — hard copy and CD (Adobe Acrobat format),
- response to comments submitted during the public comment period,
- a copy of the comment letter submitted by the South Coast Region of the Coastal Commission, and
- the following consistency determination analysis.

The draft General Management Plan and Environmental Impact Statement was completed in December, 2000, and released for public review. Comments were accepted until May 31, 2001. The National Park Service has responded to all public comments and has accordingly revised the draft GMP. The Record of Determination is currently being written and should be signed during May, 2002. The draft GMP was sent to the South Coast Region office of the Coastal Commission for review. The South Coast office submitted comments directing the National Park Service to prepare a consistency determination.

DETERMINATION

In accordance with the Federal Coastal Zone Management Act of 1972, as amended, the National Park Service has found the draft General Management Plan for the Santa Monica Mountains National Recreation Area consistent to the maximum extent practicable with the California Coastal Management Program, pursuant to the requirements of the Coastal Zone Management Act of 1972, as amended, and the California Coastal Act of 1976, as amended.

JOINT FEDERAL AND STATE PLANNING AND THE COASTAL ACT

Three major park agencies manage public parklands in the Santa Monica Mountains National Recreation Area (SMMNRA). The three agencies are the National Park Service, California Department of Parks and Recreation and the Santa Monica Mountains Conservancy. In 1995, the three agencies signed a Memorandum of Understanding (MOU) for the cooperative management of parklands within the national recreation area boundary. In the MOU, the three agencies committed to develop a single joint management plan that would provide coordinated policies and guidance for future management of Santa Monica Mountains National Recreation Area.

All three agencies manage lands within the Coastal Zone and are subject to compliance with the Coastal Act. The SMMNRA GMP consistency determination, however, applies solely to federal actions and activities conducted on federal lands within the boundaries of Santa Monica Mountains National Recreation Area as established by Public Law 95-625, November 10, 1978.

PROJECT AREAS AND ACTIVITIES SUBJECT TO CONSISTENCY DETERMINATION

The implementing regulations of the CZMA and the policies of the California Coastal Act apply to lands within coastal zone boundaries and to activities conducted outside the coastal zone that may affect lands within the coastal zone. The SMMNRA GMP includes actions and programs on lands within and outside the Coastal Zone.

The GMP is a programmatic planning document. The GMP consistency determination evaluates all actions or proposals in as much detail as is presently available. The programmatic nature of the GMP anticipates that some actions, programs and proposals will require additional future individual federal consistency determinations when site-specific information is available.

Standard of Review

The standard of review for federal consistency determinations consists primarily of the principal component of the CCMP, namely the policies of Chapter 3 of the Coastal Act. Section A (6) of the Introduction to the CCMP also states that, once incorporated into the CCMP, certified Local Coastal Programs (LCPs) "will be used in making federal consistency determinations". If an LCP has been certified by the Commission and incorporated into the CCMP, it can provide guidance in applying Chapter 3 policies in light of local circumstances. If the LCP has not been incorporated into the CCMP, it cannot be used to guide the Commission's decision but it can be used as background information.

SMMNRA falls under three LCP jurisdictions. The Ventura County LCP has been certified by the Commission. In 1987, the Coastal Commission certified the 1986 Land Use Plan (LUP) component for Los Angeles County. The LUP covered the full Coastal Zone of the Santa Monica Mountains within Los Angeles County. The full LCP for Los Angeles County

was never completed. In 1991, the City of Malibu incorporated. Currently, Los Angeles County is preparing a new LCP for the remaining unincorporated portion of Santa Monica Mountains. The Coastal Commission is drafting the LCP for the City of Malibu. Neither of the LCPs have been certified. Policies of the Ventura County LCP and the 1986 Los Angeles County LUP were taken into consideration when preparing the SMMNRA GMP consistency analysis.

PROJECT DESCRIPTION

For a detailed description of the project, please refer to pages 59-68, describing the GMP's preferred alternative. The purpose of the SMMNRA GMP is to provide an updated framework for the collective management of the Santa Monica Mountains National Recreation Area. The draft GMP updates the national recreation area's previous GMP, adopted in 1982. The GMP describes several actions revolving around five major management categories listed below (Table 8, page 96).

- Resource Management (Natural and Cultural), Character and Condition
- Visitor Experience
- Facility Development
- Management Activities (inter-agency)
- Transportation

Furthermore, the GMP divides SMMNRA into five management zones that describe the desired resource conditions and visitor experience, and the type of facilities allowed (Table 7, page 49). Different degrees of development and allowable uses distinguish the zones.

- Low Intensity (80% of land base)
- Moderate Intensity (15%)
- High Intensity (5%)
- Scenic Corridor (overlay for all zones)
- Community Landscape (overlay in moderate zone)

Additionally, the management zones provide guidance for managing areas for which the GMP makes no specific proposals, for resolving issues for resource management and visitor use that arise in the future, and for using as a policy framework for forthcoming specific plans for particular areas or management aspects of the national recreation area.

CONSISTENCY OF NPS PROPOSALS WITH PROVISIONS OF THE CALIFORNIA COASTAL ACT

The following portion of the federal consistency determination analyzes consistency between policy sections of the California Coastal Act (Division 20, California Public Resources Code) and NPS proposals and actions on federal lands in Santa Monica Mountains National Recreation Area within the California Coastal Zone. The analysis pertains only to the preferred alternative of the draft GMP. The draft GMP should be referred to for detailed

background information and justification for consistency findings. Please refer in particular to:

- Figure 3 - Map of Preferred Alternative,
- Table 7 - Management Zones,
- Table 8 - Summary of Alternatives,
- Table 9 - Summary of Environmental Consequences and Mitigation Measures,
- the textual Environmental Consequences section for the preferred alternative (pages 263-298), and
- pages 282-286 describing component actions relative to cultural resource protection.

The analysis is organized in order of Articles of the Coastal Act. Sections not referenced were not applicable to the National Park Service and/or the GMP.

Article 2 — Public Access

Section 30210. Access to the coastal zone within Santa Monica Mountains National Recreation Area is provided via a network of public recreational trails, lateral and vertical access to public beaches and the coastline, a variety of park visitor/interpretational centers, and along public transportation routes. The National Park Service is responsible for managing trails and visitor-serving facilities on federal parkland. Visitor contact facilities are also planned for Los Angeles International Airport and in downtown Los Angeles to inform the wider public about the national recreation area. Implementation of a public shuttle system to transport visitors to trailheads will be explored. The GMP also proposes a scenic coastal boat tour for visitors wishing to view the Santa Monica Mountains from an offshore vantage point.

Section 30212. The proposed Mugu Lagoon Visitor Center would be located on government military land adjacent to Pacific Coast Highway, in cooperation with Point Mugu Naval Weapon Center. Public access to the shoreline would be extended to the maximum extent possible within the security constraints of military activities. All other facility projects referenced in the GMP adjacent to the shoreline will provide public access with consideration given to resource protection. Most of the coastal access throughout the national recreation area is managed by California Department of Parks and Recreation and Los Angeles County Department of Beaches and Harbors.

Section 30212.5. Parking lots at trailheads and visitor facilities are dispersed throughout the recreation area and tend to be small to moderate in size. The GMP proposes introduction of several new visitor contact points that would continue the dispersed pattern of visitor access to the national recreation area.

Section 30213. The national recreation area is currently a no-fee federal park unit. The GMP proposes no changes to the policy of not charging for parking or entrance to federal parkland. Fares may be charged if the public shuttle system or boat tour is implemented, but public



National Park Service, Santa Monica Mountains National Recreation Area
James Raives, Calif. Coastal Commission, SMMNRA GMP Consistency Determination

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review and research would be performed to determine an affordable fare for the shuttle or boat tour.

Section 30214. The GMP defines high, moderate and low management zones to protect and preserve the national recreation area's natural and cultural resources from visitor overuse. The management zones establish the kinds of use and development allowed within different regions of the park. When implementing the GMP relating to public access, the National Park Service will adhere to the mandates of the 1916 Organic Act. Resource protection is the overarching priority, yet it must be balanced with adequate opportunities for the public to enjoy the resources.

Consistency Determination: The GMP is consistent with the CCMP Public Access policies to the maximum extent practicable because it provides for maximum resource-compatible public access to the trail network and proposes a variety of public visitor contact and educational facilities throughout the national recreation area in an environmentally sensitive and affordable manner.

Article 3 — Recreation

Section 30223. Most of the federally owned lands in the national recreation area within the Coastal Zone are the upland slopes above the coastline. The National Park Service does not own any land contiguous with the coastline, although a network of trails and dirt service roads on federal and other parkland in the upland areas interconnects with the coastline. The GMP's Visitor Experience goals (pgs. 40-41) aim to protect and preserve the recreational opportunities in the national recreation area and within the Coastal Zone. The GMP also references protection of recreational opportunities through the cooperative relationships between the National Park Service and local jurisdictions (pg. 43). The National Park Service will continue to provide comment to county and city planning agencies and the Coastal Commission to help reserve upland areas necessary to support coastal recreational uses, such as trails, within the Coastal Zone.

Section 30224. The GMP proposes a new coastal scenic boat tour from Santa Monica to the Malibu Pier that would add a recreational boating opportunity for park visitors.

Consistency Determination: The GMP is consistent with the CCMP Recreation policies to the maximum extent practicable primarily through the GMP's goals to preserve the visitor experience and the on-going interagency cooperation on building and maintaining the interagency trail network. Most of the policies relating to coastal areas suited for water-oriented recreational activities or oceanfront lands were not applicable to the National Park Service, because the Service does not own or manage any coastline parklands in the Santa Monica Mountains.

Article 4 — Marine Environment

Sections 30230 and 30231. The draft GMP recommends introduction of the federally listed endangered steelhead salmon to Solstice Canyon. The final GMP will also include reintroduction to Malibu Creek, Arroyo Sequit, and Calleguas Creek.

Section 30233. The National Park Service is committed to following all Best Management Practices and other appropriate actions as identified and recommended by the Regional Water Quality Control Board, California Department of Fish and Game, Environmental Protection Agency, and other agencies with interest and jurisdiction in the Santa Monica Mountains National Recreation Area. In addition, for actions proposed within the GMP, the park would adhere to policies and guidelines identified in the Santa Monica Mountains National Recreation Area Water Resources Management Plan (NPS 1997). Specific goals of this plan include acquiring baseline watershed and coastal resources data, protecting and restoring existing water resources where appropriate, maintaining information and data on water resources for use by other agencies, managing water resources for educational/recreational activities, and protecting public health by identifying and mitigating sources of pollution and other degradation in cooperation with appropriate regulatory bodies. The National Park Service also will continue to be an active participant in many watershed planning and management committees and subcommittees across the park, and continue as a strong supporter of actions developed from these groups to identify and protect watersheds and coastal resources. Finally, through newly available funding, the National Park Service anticipates assisting multiple agencies with water quality monitoring efforts and ongoing stream condition assessments. Overall, through this combination of data management, watershed and coastal resource information acquisition, active participation with other agencies in watershed planning and management, and adherence to policies, guidelines and Best Management Practices, watershed and coastal resources will be protected and preserved.

Consistency Determination: The GMP is consistent with the CCMP Marine Environment policies to the maximum extent practicable because of the National Park Service's mandate and commitment to preserve and protect the recreation area's marine and other natural resources in a manner implementing all applicable Best Management Practices.

Article 5 — Land Resources

Section 30240(a). Management of SMMNRA is maximally consistent with this section under existing National Park Service laws, policies, and guidelines.

Section 30240(b). Management of national parks is maximally consistent with this section under existing laws, policies, and guidelines. Boundaries for management zones prescribed in the GMP (Table 7, page 49) were drawn to designate and establish limits of high intensity use and to provide a moderate intensity buffer between the high and low intensity areas.

National Park Service, Santa Monica Mountains National Recreation Area
James Raives, Calif. Coastal Commission, SMMNRA GMP Consistency Determination

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Section 30244. SMMNRA is rich in archaeological resources. Proposed new and/or upgraded projects and facilities must comply with the National Historic Preservation Act, Section 106; each project will be assessed for the need to consult with the State Historic Preservation Officer according to Section 106 of the National Historic Preservation Act. After each proposed component action, the GMP lists initial cultural resource protection measures to be taken (pages 282-826).

Consistency Determination. The GMP is consistent with the CCMP Land Resources policies to the maximum extent practicable because of existing federal laws, policies, and guidelines regarding resource-dependent development and cultural and natural resource protection.

Article 6 — Development

Section 30250(c). All facilities proposed in the enclosed draft GMP are either existing development or are proposed within previously degraded areas. See Figure 6 for facilities located within the Coastal Zone and pages 282-288 for the list of projects. When the projects are developed, individual consistency determinations will be prepared along with environmental impact analysis and mitigation plans in compliance with NEPA (and CEQA for joint federal/state projects).

In response to public comments, trail camps along the Backbone Trail have been added to the preferred alternative and will be illustrated in the final GMP. Most of the proposed camps are within the Coastal Zone. Detailed environmental review of the generalized locations is beyond the scope of the GMP. The forthcoming Trail Management Plan will address the camps in detail, including establishing specific locations and analyzing environmental impacts. A consistency determination will be part of preparing the joint EIS/EIR for the Trail Management Plan. The consistency determination will address the trail camps and several other aspects of recreational trail planning that are not covered in the GMP.

Section 30251. Management of national parks is maximally consistent with this section under existing laws, policies, and guidelines. All facilities will be sited and designed to be attractive and subordinate to the surrounding scenic resources.

Section 30252. Management of national parks is maximally consistent with this section under existing laws, policies, and guidelines. The proposed facilities along the coast will have access to public transportation provided by Los Angeles County Metropolitan Transportation Authority. The proposed park shuttle system will also provide public transportation to the beaches and the interior trail network. Additionally, the cooperative planning efforts summarized on page 43 of the GMP include working with other agencies to connect the interior trail network to the coast where feasible. The park also works with permitting agencies to preserve public trail access when development is proposed.

Section 30253(1) and Section 30253(2). National Park Service laws, policies, and guidelines are maximally consistent with this section. SMMNRA lies within a region subject to geologic, wildfire, flooding and landslide hazards. Structures will be designed for maximum

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protection from natural disasters without being unduly unattractive or requiring unsightly hazard protection devices. Emergency evacuation plans and procedures will be instituted as part of the project. More detailed environmental review and attention to design will take place when individual projects are implemented. As mentioned earlier, individual consistency determinations will be prepared as part of project implementation.

Section 30255. National Park Service proposals and programs outlined in the GMP are maximally consistent with this policy. The proposed Mugu Lagoon Visitor Center will be located on existing disturbed lands adjacent to Mugu Lagoon. Visitor facilities will be designed to protect sensitive wetland resources while offering the public compatible viewing and educational opportunities. Other facilities proposed within the Coastal Zone are located adjacent to the coastline, with public access opportunities to the coast currently available at each location.

Consistency Determination: The GMP is consistent with the CCMP Development policies to the maximum extent practicable because of existing federal laws, policies, and guidelines regarding resource-dependent development and the goal to balance resource protection with adequate public access.

Article 7 — Industrial Development

Article 7 is not applicable to the SMMNRA GMP.

Thank you for reviewing the SMMNRA GMP consistency determination. We understand the consistency determination must be approved by the Coastal Commission at a future Commission meeting. We would appreciate notification when the consistency determination is put on the Commission's agenda. If you have questions or need additional information, please call Melanie Beck, Outdoor Recreation Planner, at (805)370-2346, or myself, at (805)370-2344.

Sincerely,



Woody Smeck
Acting Superintendent

cc: Joe Edmiston, Executive Director, Santa Monica Mountains Conservancy
Russ Guiney, Superintendent, Angeles District, State Department of Parks and Recreation





United States Department of the Interior

NATIONAL PARK SERVICE
Santa Monica Mountains National Recreation Area
401 West Hillcrest Drive
Thousand Oaks, California 91360-4207

In reply refer to:
L76 (SAMO)

May 8, 2002

Ms. Sara Wan, Chair
California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, CA 94105-2219

Dear Chairperson Wan and Commissioners:

In March this year, the National Park Service (NPS) submitted to the Coastal Commission a consistency determination for our draft General Management Plan (GMP) for the Santa Monica Mountains National Recreation Area, pursuant to Section 930.34 *eq seq.* of the National Oceanic and Atmospheric Administration Federal Consistency Regulations (Title 15 Code of Federal Regulations, Part 930). Coastal Commission staff recently apprised our office of the need to provide additional information for the consistency determination and of the need to make revisions to the draft GMP. The staff requested we submit information documenting the National Park Service's commitment to consistency with policies of the Coastal Act as stated in Chapter 3. We ask the Commission to consider this letter our commitment toward the goals of the Coastal Act, and toward incorporating into the GMP recommended changes to the satisfaction of the Commission. We will also revise our consistency determination to reflect required changes.

The Coastal Commission staff's concerns include the generalized conceptual nature of the draft GMP; absence of attention to the Coastal Act's "environmentally sensitive habitat area" (ESHA) designation; inadequate delineation and quantification of wetlands as defined by the Coastal Act instead of the U.S. Army Corps of Engineers's provisions; and finally, inadequate discussion of management practices to avoid, protect, restore and mitigate impacts to ESHA-designated lands.

Conceptual Nature of the Draft GMP

An overarching concern was the conceptual format of the draft GMP that resulted in an undetailed environmental impact analysis of proposed projects. The National Park Service's planning process is governed by NPS Director's Order 2: Park Planning (DO-2). Under DO-2, the GMP/EIS is intended to be part of a larger and tiered planning process: general management planning, park strategic planning, implementation planning, and annual performance planning. The purpose of the GMP is to ensure that each park has a clearly defined direction of resource preservation and visitor use. The GMP is the first phase of planning and decision making and has a "shelf-life" of ten to 15 years. As such, it takes the

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long-term view and considers the park in its full ecological and cultural context and as part of the surrounding region. GMP approval does not create any on-the-ground environmental changes, and it does not dictate that any particular site-specific action must occur. The purpose of the GMP/EIS is to provide a framework from which site-specific projects and implementation plans may be developed in the future. For some projects, the general nature of the GMP may preclude a complete analysis at this time of all possible effects to sensitive habitats and species that could occur upon project implementation.

Consequently, the level of project-specific environmental analysis that Commission staff may have anticipated is neither included nor analyzed in the EIS for the GMP. In most cases, specific data have not been and will not be amassed until the third tier of the planning process, the implementation plans. Implementation plans are generally deferred until the activity or project under consideration has sufficient priority to indicate that action will be taken within the next two to five years.

We acknowledge there are proposed projects in the GMP that would require individual consistency determinations. We also wish to point out that the staff report references the Coastal Zone Management Act's provision for the tiered planning process.

(d) Phased consistency determinations. ... In cases where federal decisions related to a proposed development project or other activity will be made in phases based upon developing information that was not available at the time of the original consistency determination, with each subsequent phase subject to Federal agency discretion to implement alternative decisions based upon such information (e.g., planning, siting, and design decisions), a consistency determination will be required for each major decision. [15 CFR Section 930.36(d)]

We ask the Commission to allow for our binding requirement to prepare the GMP in a generalized manner. We also wish to assure the Commission that we will file individual consistency determinations for proposed site-specific projects referenced in the GMP. The individual consistency determinations will reflect maximum detail on resource conditions and potential impacts, particularly to ESHA-designated resources and wetlands as defined by the Coastal Act. Furthermore, at the site-specific level we can outline preservation and mitigation measures that would be incorporated into the individual consistency determinations, especially regarding ESHAs and wetlands.

Environmentally Sensitive Habitat Areas (ESHAs)

A major concern of Commission staff is the GMP's absence of any reference to habitat types that fall within the Coastal Act's definition of ESHA. The omission is made more serious in the Commission staff's view because of the proposed Malibu Land Use Plan that designates coastal sage scrub and chaparral in Malibu as ESHA. The National Park Service is willing to revise the GMP to address ESHAs. We must inform the Commission, however, that the draft GMP was completed and presented for public review as of January, 2001, and public



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comment on the draft GMP closed on May 30, 2001. The timeframe precluded knowledge of the Malibu LUP ESHA designation, since the draft LUP was not released until fall, 2001.

We understand from staff that the draft GMP's description of the Affected Environment adequately describes existing natural resource conditions, including sensitive habitat types and sensitive plant and animal species. The draft GMP, however, needs to be edited to address the sensitive habitats and species listed in the Affected Environment section in the context of the ESHA definition. We will work with Coastal Commission staff to accomplish the GMP edits.

The National Park Service recognizes the ecological significance of the Santa Monica Mountains as the National Park System's only example of the Mediterranean-type ecosystem—indeed, the park was established in large part to protect this significance. Consistent with our agency policies and mandates, we must recognize this significance and act to promote its understanding and protection. When other agencies, such as the Coastal Commission or other regulatory bodies, identify ecologically significant lands within the mountains, such as ESHAs, we ensure that our actions and policies are consistent with these designations, including for actions proposed within our General Management Plan.

In addition, we often provide information about the park and its resources to our agency partners so that they can more effectively evaluate and designate significant resources within their jurisdictions. The Coastal Commission has received considerable resource information, ranging from GIS data layers to letters describing the significance of coastal sage scrub.

For all site-specific projects proposed within the GMP, appropriate environmental analyses will be undertaken to ensure compliance with the resource protection requirements of the Coastal Commission. Federal parklands within the Coastal Zone include lands that would qualify for ESHA designation. All projects proposed in the GMP will be assessed at the time of implementation for their location relative to ESHA-designated habitat or resources. Based on the detailed locational analysis, appropriate protective measures will be implemented, including redesigning facilities to avoid the ESHA, maintaining a 100-foot buffer away from ESHA resources, and constructing the facilities in a manner that avoids long-term impacts to the ESHA.

Wetland Delineation

Coastal Commission staff found the GMP/EIS inadequately delineates and quantifies wetlands as defined by the Coastal Act. As mentioned earlier, the GMP is not intended to assess resource conditions to a project-specific level of detail. It is not appropriate to define in the GMP the wetlands potentially impacted by proposed projects; we do not yet know the specific design and development footprint of the conceptual projects. At the time a project becomes a priority and design and environmental review commences, the National Park Service would certainly commit to delineating potential wetlands in accordance with the Coastal Act's wetlands definition.

Management Practices to Avoid, Protect, Restore and Mitigate Impacts to ESHAs

The primary tool in the GMP to protect ESHAs is the Low Intensity designation applied to 80% of the full Santa Monica Mountains National Recreation Area. The intent of the Low Intensity designation is the avoid impacts where possible and manage the land for maximum protection of resources. Development in Low Intensity-designated lands must be harmonious with the natural setting. Although this directive may sound broad, it implies that all existing and new facilities must be planned in accordance with the highest level of compliance with policies protecting sensitive areas, such as the Coastal Act policies that protect ESHAs. To this end, proposed projects in the GMP are located within previously disturbed areas as we discussed in the consistency determination. Additionally, for virtually any NPS-generated project, including those located within an ESHA, we would implement ESHA-protective measures as mentioned above, including proper facility design, location to minimize impact to ESHAs and to provide an adequate buffer away from the ESHA where possible, and construction best management practices to avoid erosion, wildlife disruption, or viewshed scenic impacts.

In addition to facility management practices, we have a sizable resource management program to identify and research natural and cultural resources of the national recreation area. Consistent with our goal of understanding and protecting the ecological values of the Santa Monica Mountains, the National Park Service has initiated a number of scientific and resource management projects and programs that concern the species and habitat types defined as ESHAs. For example, the National Park Service is funding inventory and monitoring efforts across the mountains to evaluate stream water quality conditions and potential urban-associated impacts. We are surveying watersheds for native amphibians and for potentially damaging exotic species. Our terrestrial ecology programs include reptile studies in natural habitats near developments. Our internationally recognized research on carnivores (including bobcats, coyotes, gray foxes, and mountain lions) is helping to identify habitat needs, conservation requirements, and important movement corridors for these species across the mountains. All of this information has proved useful to various agencies and organizations, including the Coastal Commission, in their efforts to identify and protect significant resources of the Santa Monica Mountains that would qualify under the Coastal Act's ESHA definition.

Resource management activities have included riparian restoration projects, wetland and lagoon restoration projects, and exotic species control in sensitive habitat areas (e.g. riparian areas). Our fire management program is now aggressively applying fire to restore important habitats and remove invasive exotic plants, while at the same time implementing fuel reduction efforts which provide public safety while protecting the environment. Other active management programs include the restoration of steelhead trout in park streams, including an ongoing effort to remove steelhead movement barriers and restore habitat in Solstice Creek. All of these efforts are linked to strong education and outreach programs linked to agencies and organizations across the Santa Monica Mountains and southern California.

The General Management Plan proposes to continue these activities and actually increase our resource stewardship and protection efforts (under the preferred alternative). We see these



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GMP/EIS*

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May 8, 2002

actions as consistent with the Coastal Commission goals and are pleased that we have been able to assist the Commission staff with data and information about resources in the park. Of course, under the updated GMP, these actions would continue with our science, resource management, and restoration programs still providing support consistent with the ecological protection goals of the Coastal Commission and other agencies in the Santa Monica Mountains.

We hope we have provided clarification on the issues of concern to Coastal Commission staff and have given the Commission a summary of the commitment the National Park Service has toward protecting the park's resources according to the Coastal Act. We wish to remind the Commission that the 1916 National Park Service Organic Act mandates us to manage park resources in a manner that will leave those resources unimpaired for the enjoyment of the current and future generations of Americans. We view the Coastal Act as an important legal framework that is highly compatible with our own resource preservation and public access mandates. We will be glad to work with the staff to incorporate recommended changes into the draft GMP and to revise our GMP consistency determination to satisfy the Commission's mandate to uphold the Coastal Act.

Thank you for considering the National Park Service's input. If we can be of assistance, please call Melanie Beck, Outdoor Recreation Planner, at (805)370-2346.

Sincerely,



Woody Smeek
Acting Superintendent

cc: Joe Edmiston, Executive Director, Santa Monica Mountains Conservancy
Russ Guiney, Superintendent, Angeles District, State Department of Parks and Recreation

Appendixes
Coastal Commission/NPS Letters

STATE OF CALIFORNIA - THE RESOURCES AGENCY

GRAY DAVIS, Governor

CALIFORNIA COASTAL COMMISSION

435 FRENCH STREET, SUITE 2000
SAN FRANCISCO, CA 94105-2219
VOICE AND TDD (415) 904-5200



June 13, 2002

Melanie Beck
United States Department of the Interior
National Park Service
Santa Monica Mountains National Recreation Area
401 West Hillcrest Drive
Thousand Oaks, California 91360

**Re: Consistency Determination CD-025-02 Santa Monica Mountains National Recreation Area
Draft General Management Plan**

Dear Ms. Beck:

On May 10, 2002, the California Coastal Commission concurred with the above-referenced consistency determination. The Commission found the Draft General Management Plan to be consistent with the California Coastal Management Program.

Sincerely,

A handwritten signature in black ink that reads "Kathleen A. Styckel".

Kathleen Styckel
Federal Consistency Staff



*Santa Monica Mountains National Recreation Area
GMP/EIS*



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
Southwest Region
501 West Ocean Boulevard, Suite 4200
Long Beach, California 90802-4213

JUN 14 2002

In reply refer to:
151422SWR01PR123:APS

Woody Smeck
National Park Service
Santa Monica Mountains National Recreation Area
401 West Hillcrest Drive
Thousand Oaks, California 91360-4207

Dear Mr. Smeck:

The National Marine Fisheries Service (NMFS) has reconsidered its recommendation for the National Park Service (NPS) to consult formally under the Endangered Species Act of 1973, as amended, on the federal action involving approval of the General Management Plan (GMP) for the Santa Monica Mountains National Recreation Area. The information provided in your recent Biological Assessment and discussions with your staff allowed NMFS to develop an improved understanding of the GMP.

Based on this information, NMFS believes that formal consultation is not necessary for approval of the GMP. NMFS determined that implementation of the GMP has no effect on steelhead because the GMP is a conceptual planning document and is not a condition precedent for project implementation. Moreover, NPS will initiate consultation with NMFS when specific activities (i.e., ground-breaking activities) that might be associated with the GMP are implemented for the purpose of avoiding or minimizing any potential adverse effects to steelhead or their habitat.

NMFS appreciates the opportunity to collaborate with NPS. Anthony Spina is the principal contact for this specific project. Please call him at (562) 980-4045 if you have a question concerning this letter or if you would like additional information.

Sincerely,

Rodney R. McInnis
Acting Regional Administrator

cc: Ray Sauvajot, NPS



FINAL REPORT

**BIOLOGICAL ASSESSMENT FOR THE SOUTHERN
CALIFORNIA STEELHEAD FOR THE
NATIONAL PARK SERVICE
GENERAL MANAGEMENT PLAN/
ENVIRONMENTAL IMPACT STATEMENT
FOR THE SANTA MONICA MOUNTAINS
NATIONAL RECREATION AREA**

Prepared by:

Greystone Environmental Consultants

April 2002



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1.0 INTRODUCTION

1.1 PURPOSE OF THIS ANALYSIS

The Endangered Species Act (ESA) requires federal agencies to ensure their actions are not likely to jeopardize the continued existence of any species listed as threatened or endangered under the ESA. To meet this requirement, federal agencies considering approvals of actions must consult with the U.S. Fish and Wildlife Service (USFWS) or the National Marine Fisheries Service (NMFS), which have the primary authority for implementing the ESA. Preparing a biological assessment (BA) is an integral part of this consultation process. The purpose of this BA is to analyze the potential effects of the Preferred Alternative of the National Park Service's (NPS) Santa Monica Mountains National Recreation Area (SMMNRA) General Management Plan/Environmental Impact Statement (GMP/EIS) on the federally listed Southern California steelhead trout (*Oncorhynchus mykiss*). The endangered Southern California Steelhead Evolutionarily Significant Unit (ESU) is addressed in this document.

This document analyzes the potential direct, indirect, and cumulative effects the Preferred Alternative may have upon the Southern California Steelhead ESU. Based on this analysis, a determination is made as to whether the proposed project may adversely affect this species, and mitigation measures that reduce potential adverse effects are recommended.

1.2 PROPOSED PROJECT

The U.S. Congress created the SMMNRA in 1978 and granted the NPS the authority to promote a level of shared management for the park. The NPS, California State Parks (CSP), and Santa Monica Mountains Conservancy (SMMC) jointly administer the public parklands within the SMMNRA. The area's first GMP was completed in 1982. In the last two years, these agencies have joined together to assess the 1982 GMP and review the mission and purpose of the recreation area. While many of the issues and goals for the SMMNRA remain the same, the magnitude of use has changed dramatically and environmental impacts must be examined.

The three agencies have drafted a new GMP/EIS document that offers five alternative approaches to manage the recreation area throughout the next 15 to 20 years. This BA analyzes the potential impacts to steelhead that would result from selection of the Preferred Alternative of the GMP/EIS, hereafter referred to as the project, which provides the framework for management and implementation plans. The portions of the project that potentially affect the steelhead are discussed in detail in Section 5.0 of this BA, and are briefly summarized below.

In the GMP/EIS, the Preferred Alternative presents conceptual visions for the recreation area in several levels of management areas: low intensity, moderate intensity, and high intensity areas. Impacts to steelhead would result from 1) facility development, 2) proportion of intensity types of management areas, 3) visitor usage, and 4) park maintenance. Facility development, visitor usage, and park maintenance would occur at varying levels within the low intensity, moderate intensity, and high intensity areas; hence, potential impacts to steelhead would vary depending on the management area intensities.

The development of specific facilities is discussed at a conceptual level; for that reason, the analysis of the environmental consequences is quite general in the GMP/EIS. Implementation of the Preferred Alternative in the future will define particular projects and project-specific analyses.

The Preferred Alternative is an environmentally superior alternative that also best meets the goals and objectives of the SMMNRA. It would designate 80 percent of the total acreage for preservation (low intensity use). Fifteen percent would be designated as moderate intensity use areas and five percent would be designated as high intensity use areas. The highest number of facilities would be developed within the high intensity use areas.

1.3 CONSULTATION TO DATE

As a result of informal consultation between the NPS and USFWS, it was determined that a programmatic BA would not be completed for the GMP/EIS because implementation of the Preferred Alternative of the GMP is not likely to adversely affect federally threatened and endangered species under jurisdiction of the USFWS (i.e., listed species other than steelhead) (Smeck 2002). It is anticipated that additional consultation may be necessary between the NPS and USFWS as individual projects are developed during implementation of the Preferred Alternative. The purpose of this additional review process would be to assess project-specific effects to listed species and ensure that appropriate actions and/or mitigation measures are implemented if the effects are substantially different from those anticipated from the generalized GMP/EIS. This approach would allow for the most accurate assessment of the effects of proposed projects on protected species and their habitats. The formal correspondence between the NPS and USFWS documenting this approach was completed on January 10, 2002 with receipt of a concurrence letter by the NPS from USFWS.

The NMFS reviewed the Draft GMP/EIS for the SMMNRA and replied with a letter requesting that NPS begin formal consultation under Section 7 of the ESA (Lent 2001). The letter also suggested that NPS and NMFS should meet to define the scope and content of the consultation. In response to this letter, NPS and Greystone representatives met with Anthony Spina of NMFS on August 30, 2001 to develop a scope and an outline for this BA, which follows the outline developed through these consultations with NMFS.

Although this BA addresses the overall effects of the GMP/EIS on steelhead, it is anticipated that additional consultation may be necessary between the NPS and NMFS as individual projects are developed during implementation of the Preferred Alternative. The purpose of this additional consultation would be to assess project-specific effects to steelhead, ensure that the effects are not substantially different than those assessed in this BA, and to amend this BA if necessary to reflect any substantially different effects that may arise from the proposed project.

1.4 CRITICAL HABITAT

Critical habitat has been identified for the Southern California ESU for steelhead (NOAA 2000a). Critical habitat is designated to include all river reaches accessible to steelhead in coastal river basins from the Santa Maria River south to Malibu Creek, California, except for

reaches on Indian lands. Also included are adjacent riparian zones of estuarine and riverine reaches that are within 300 feet of the high water line. Excluded are areas above specific dams identified by NOAA (2000a) (including Rindge Dam in Malibu Creek) or above longstanding, naturally impassable barriers (i.e., natural waterfalls in existence for at least several hundred years). NMFS also clarified that reaches or basins historically and currently unoccupied (e.g., Calleguas Creek, Ventura County, California) are not considered critical habitat. This rule disqualifies a majority of the small coastal streams within the project area north of Malibu Creek from critical habitat designation due to their historical and current absence of steelhead. The following counties lie partially or wholly within these basins (or contain migration habitat for the species): San Luis Obispo, Santa Barbara, Ventura, and Los Angeles.

Based on a review of the hydrologic units listed by NOAA (2000a), a portion of the proposed project (the Santa Monica Bay hydrologic unit) occurs within identified critical habitat. No coastal streams south of the Malibu Creek watershed are within designated critical habitat, and all coastal streams north of Malibu Creek (including Malibu Creek) and within the project area are within designated critical habitat.

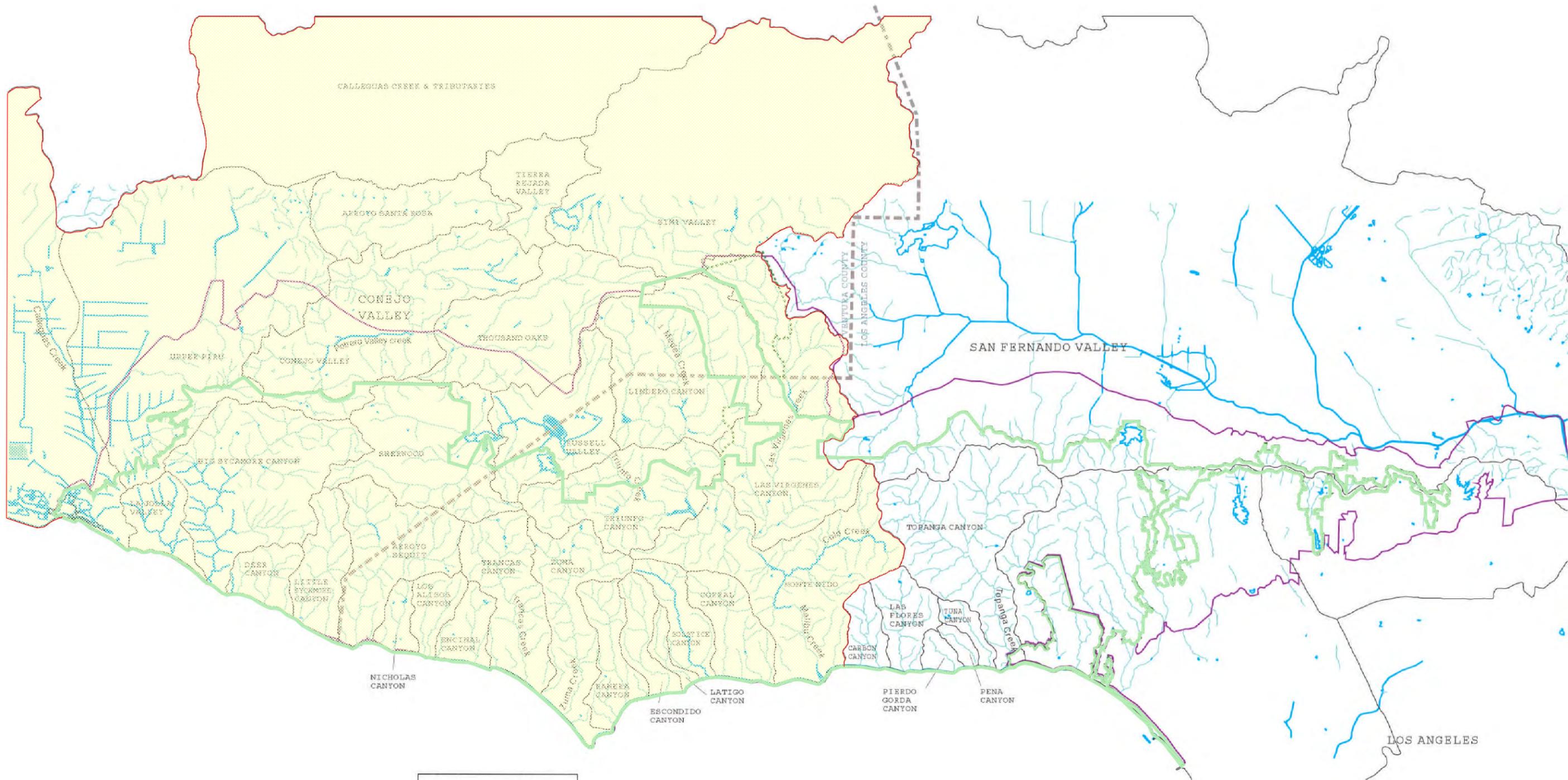
Based on new information indicating that steelhead or their progeny now occur in at least two coastal river basins south of Malibu Creek, and have successfully spawned in one of these basins (San Mateo Creek), NMFS issued a proposed rule under the ESA to extend the current range of the endangered Southern California steelhead Evolutionary Significant Unit (ESU) south to San Mateo Creek in northern San Diego County. Within the redefined Southern California steelhead ESU, only naturally spawned populations of steelhead and their progeny, which reside below naturally occurring or man-made impassable barriers, are proposed for listing. At this time, NMFS is proposing to list only the anadromous life forms of steelhead in those river basins south of Malibu Creek. All coastal streams south of Malibu Creek within the NRA are within this proposed portion of critical habitat.

2.0 ACTION AREA

The legislated boundary of the SMMNRA generally covers the Santa Monica Mountain region in southern California (Figure 1). It totals 150,050 acres, and currently encompasses 69,099 acres of protected parkland. The remainder (80,951 acres) is privately owned and not protected as parkland. This presents a difficult management scenario for the SMMNRA since a majority of the land is not controlled by the government. Ninety percent of the area within the SMMNRA boundaries is not developed. Three management areas have been designated within the SMMNRA. At present, 30 percent are designated as low intensity areas, 60 percent are designated as moderate intensity areas, and 10 percent are designated as high intensity areas.

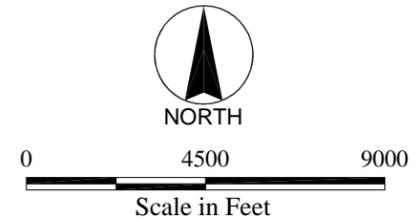
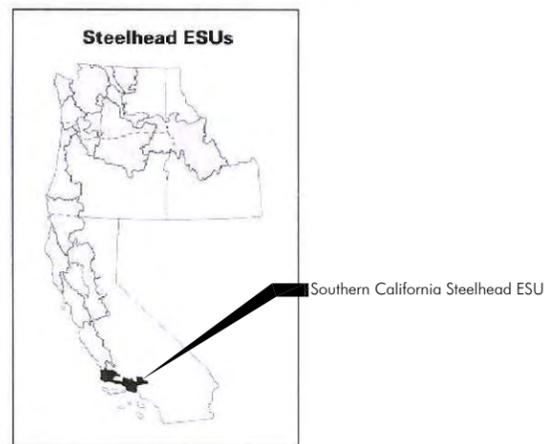
The SMMNRA extends from the Hollywood Bowl on the east, 46 miles west to Point Mugu, and averages seven miles in width. To the north, the SMMNRA is bordered by Simi Valley, the San Fernando Valley, and many communities that have developed along Highway 101. The Pacific Coast Highway (PCH) crosses the south edge of the SMMNRA through the communities of Topanga, Malibu, and Pacific Palisades (Figure 2).

The east-west trending mountain range is geologically complex and characterized by steep, rugged mountain slopes and canyons. Elevations range from sea level to more than 3,000 feet (NPS 2000a). The Santa Monica Mountains are adjacent to 46 miles of coastline with sandy beaches, rocky tide pools, lagoons, and coastal streams, some of which provide suitable habitat for steelhead.



LEGEND

-  Los Angeles / Ventura County Line
-  SMMNRA Boundary
-  SMNZ Boundary
-  Intermittent Streams
-  Perennial Streams
-  Watershed Boundary
-  Southern California Steelhead Evolutionary Significant Unit (ESU)



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 SANTA MONICA MOUNTAINS
 NATIONAL RECREATION AREA

United States Department of the Interior
 National Park Service
 SAMO - September 2000 - 638 - 20072

Scale: 1" = 4500'	Date: 12.10.01	Figure 1
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- 1 Mugu Lagoon visitor EDUCATION center
- 2 Esuci research & info. facility
- 3 Circle X ranch camp
- 4 REDESIGN Leo Carrillo CAMPGROUND TO BE ENVIRONMENTALLY SENSITIVE
- 5 paramount ranch film history center
- 6 Los Virgenes environmental education center
- 7 gillette ranch joint administration and environmental education center
- 8 MALIBU BLUFFS visitor center
- 9 Malibu Pier visitor contact station
- 10 Scenic coastal tour
- 11 415 FCH santa monica / pacific coast highway visitor information site
- 12 Lax visitor contact site
- 13 Franklin Canyon EXPANDED & education day camp
- 14 Olvera St. visitor contact station

Preferred Alternative

Emphasis would be on incorporating elements of all three alternatives using resource preservation as the driving force.

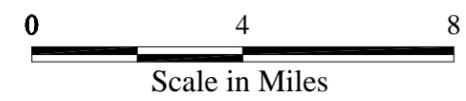
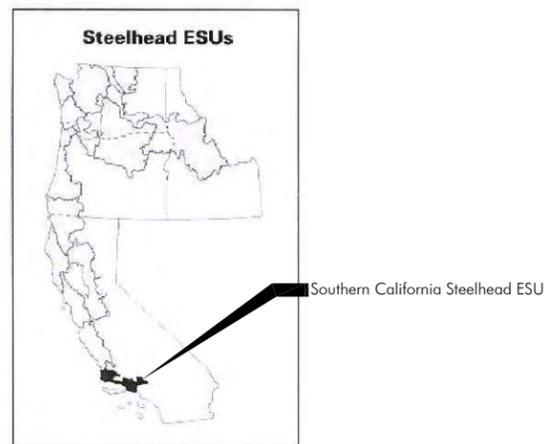
Exceptional education opportunities that do not compromise resource preservation and serve a diverse public would be provided. Development would take place only in previously disturbed areas.

Approximately 80% of area would be designated "low intensity"; therefore, visitor access to sensitive resources would not be facilitated or encouraged. Moderate use areas would act as a buffer for the preservation area.

Management areas:

- **Low Intensity Area**
Emphasis would be on natural and cultural resource preservation and a sense of being immersed in a natural and wild landscape away from the comforts and conveniences of civilization. The sights and sounds of nature in this area would be more prevalent than that of humans. There would be no overnight uses, hiking, biking, and horseback riding would only be on designated trails.
- **Moderate Intensity Area**
Emphasis would be predominantly on the natural environment, but there would also be a sense of being near the familiarity, comforts, and convenience of civilization. Facility development would harmonize with the natural setting and be based on the principles of sustainable development as described under the previous goals. Hiking, biking, and horseback riding on designated trails, low-impact camping, and self-guided and guided interpretive walks would be acceptable activities. Moderate use areas would act as an insulating buffer around urban development.
- **High Intensity Area**
Emphasis would be on facility development that harmonizes with natural and cultural settings. There would be a sense of being surrounded by the scenic landscape and cultural resources of a unit of the national park system. The sights and sounds of people and development within and outside the area would be readily apparent. There would be frequent encounters with vehicles, other types of visitors, and park staff. Activities would include hiking, biking and horseback riding on designated trails, self-guided trails, visitor orientation, camping, educational activities and study programs, picnicking, and interpretive walks, events and festivals, day camps, and community activities.
- **Scenic Corridor**
Emphasis would be on road through scenic landscapes and cultural resources of the park. People would experience the park by driving on scenic roads. During some seasons, days, and times of day there would be extensive interaction with other vehicles. Surrounding development would harmonize with the scenic quality of the landscapes and be based on the principles of sustainable development. Environmental impacts from road development, management, and visitor use would be mitigated. Activities such as picnicking, self-guided tours, viewing the park by car, motorcycle, or bus, bikes, and hiking along segregated trail routes would be encouraged.
- P **Community Landscape**
Emphasis would be on private development that has unique character, architecture, or landscape and that deserves special recognition. However, the designation does not suggest any type of management other than technical assistance.

- LEGEND**
- SMMNRA Boundary
 - SMNZ Boundary
 - Land of Exceptional Value to Overall Recreation Area That Would Protect Habitat and Open Space
 - Land Adjacent to Park Boundaries to be Added
 - Land Recommended for Boundary Study
 - Preserve Areas
 - P Parking Area
 - Backbone Trail
 - Tomol Sea Kayak Trail
 - * Visitor Information Center
 - High Fire and Landslide Frequency Zone
 - Protection/Restoration of Watershed & Marine Interface Zones



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United States Department of the Interior

National Park Service
SAMO - September 2000 - 638 - 20072

Scale: As Noted	Date: 12.10.01	Figure 2
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3.0 LIFE HISTORY, ABUNDANCE, AND DISTRIBUTION OF STEELHEAD IN THE ACTION AREA

3.1 LIFE HISTORY OF CALIFORNIA STEELHEAD

The following is a summary of California steelhead life history from Titus et al. (2001), except as otherwise noted.

The coastal rainbow trout, *Oncorhynchus mykiss irideus*, is a polymorphic subspecies (Behnke 1992). Populations may be anadromous (sea-run), resident (in freshwater streams), or a mixture of each where the two forms presumably interbreed. Although the sea-run and resident populations comprise the same subspecies, the different forms have unique common names: the anadromous form is called steelhead; the resident form is simply called rainbow trout. Both forms may exist in the same stream system, and in some instances may be physically discrete from one another due to an impassable barrier to upstream migration, such as a waterfall. In these situations, rainbow trout occur above the barrier, and steelhead, or a mixed morph population, exist below.

In polymorphic salmonids, males exhibit an especially high degree of life history variation. The literature is replete with examples that demonstrate that on average, relative to females, males mature at an earlier age and smaller size. This variation is particularly striking in anadromous salmonids where males often mature as parr prior to migration to the sea (meaning that they often mature at a young age and spawn prior to emigrating to the ocean). In some cases, mature male parr may have a relatively high probability of remaining in fresh water and functionally assuming a resident life style (Dellefors and Faremo 1988; Hansen et al. 1989). In other instances, most mature male parr eventually migrate to the sea following spawning (Titus and Mosegaard 1992) and return following a growth period as much larger migrant spawners (H. Mosegaard and R. Titus, Institute of Limnology, Uppsala University, Uppsala, Sweden, unpublished data). Therefore, in iteroparous anadromous salmonids (those which spawn more than once) such as steelhead, males are able to spawn several times during their lifetime, beginning potentially as parr (often age 1+) and continuing as large migrants that return from the ocean to spawn. This general life-history plasticity in males results in higher age-specific mortality rates for males than females because they begin breeding at an earlier age (Shapovalov and Taft 1954).

Within- and between-population variation in life history traits is not well documented for California steelhead, especially south of San Francisco Bay where environmental conditions shift from a moist to an arid environment following a sharp gradient. Shapovalov and Taft's (1954) comprehensive life history study was conducted within this area, namely at Waddell Creek in Santa Cruz County. For use as a general reference with which comparisons may be made, the following is a summary and analysis of several key life history characteristics from Shapovalov and Taft's (1954) landmark study, except as otherwise noted.

South of San Francisco Bay, steelhead are all winter-run fish. Entry into freshwater is dependent upon breaching of the sandbar at the stream mouth following the onset of the winter rainy

season. At Waddell Creek, the upstream spawning migration was rather protracted and varied among years (Shapovalov and Taft 1954). On average, most upstream movement occurred between December and April. Males dominated numerically in the early portion of the run.

As with the upstream spawning migration, the downstream migration of spent (post-spawning) adult steelhead was also protracted and variable among years (Shapovalov and Taft 1954). On average, most downstream movement occurred between March and July. Fish that did not return to the ocean immediately after spawning held in larger pools.

The development rate of steelhead eggs is dependent upon water temperature in the gravel in redds (typically gravel at downstream ends of riffles). Based on the results of Wales (1941), hatching occurs after about 19 days at an average temperature of 15.5°C (295 degree-days), and 80 days at about 4.5°C (360 degree-days). Shapovalov and Taft (1954) estimated that hatching time in Waddell Creek varied from 25 to 35 days, emergence from the gravel began 2-3 weeks after hatching, and another 2-3 weeks was required to complete emergence. Mortality rates of salmonid fry are typically high following emergence (Titus 1990). Age 0+ steelhead utilize habitats with swift currents, moving gradually into deeper water as they grow (Shapovalov and Taft 1954).

3.2 ABUNDANCE AND DISTRIBUTION OF STEELHEAD IN THE ACTION AREA

Information presented here was gathered from two main sources: 1) a literature search was conducted for pertinent journal articles and other resource agency, university, and consultant publications; and 2) interviews were conducted with professional biologists, academicians, and representatives of special interest groups for information from personal files, and anecdotes based on personal observations. Various other experts who have done steelhead work in the streams in the project area were contacted and interviewed in order to gather all available data.

The western portion of the project area from the Malibu Creek watershed northwest to part of the Calleguas Creek watershed is contained within the Southern California steelhead ESU (Figure 1). All drainages south of Malibu Creek are excluded from the ESU; however, the area south of Malibu Creek and north of San Mateo (San Diego County) has been proposed as an extension of the existing ESU (NOAA 2000b). The Southern California ESU is the southernmost of the federally designated steelhead ESUs on the west coast of the United States.

Historically, steelhead populations existed as far south as mid-Baja California, Mexico (Finney and Edmondson 2001). Today steelhead have nearly the same distribution as the Pacific lamprey, and a mutually exclusive five to eight streams south of Morro Bay to Malibu Creek still hold anadromous steelhead and lamprey (Swift et al. 1993).

Within the project area, the following four streams have recent records of steelhead: Arroyo Sequit, Big Sycamore Creek, Malibu Creek, and Topanga Creek (Swift et al. 1993). Swift et al. (1993) report that steelhead have not been found south of Topanga Creek since before 1970; however, Finney and Edmondson (2001) state in a more recent report that steelhead were located in San Mateo Creek near the Orange County/San Diego County line in 1999, indicating that

steelhead are still capable of recolonizing historical streams in the southern part of their range. Probably the most comprehensive account regarding historic and current steelhead abundance and distribution in Southern California as of 1996 is Titus et al. (2001). This manuscript is a compilation of information used to construct drainage-by-drainage historical reviews and current status reports. Much of the abundance and distribution data available for this area were compiled by Titus et al. (2001).

The project area contains approximately 52 coastal streams. Thirty-eight of them are within designated critical habitat for the Southern California Steelhead ESU, and 14 are not within designated critical habitat (these 14 are within the proposed extension of the ESU). The streams within critical habitat, listed from west to east, are (i) Ventura County: Calleguas Creek, La Jolla Creek, Big Sycamore Creek, unnamed creek, unnamed creek, Deer Creek, unnamed creek, Little Sycamore Creek, unnamed creek; (ii) Los Angeles County: unnamed creek, Arroyo Sequit, Willow Creek, unnamed creek, San Nicholas Creek, Los Alisos Creek, unnamed creek, Lachusa Creek, Encinal Creek, Steep Hill Creek, unnamed creek, Trancas Creek, unnamed creek, unnamed creek, Zuma Creek, unnamed creek, unnamed creek, Walnut Creek, Ramirez Creek, unnamed creek, Escondido Creek, Latigo Creek, Solstice Creek, Corral Creek, Puerco Creek, unnamed creek, Marie Creek, Winter Creek, and Malibu Creek. The streams outside of critical habitat (but within the proposed extension of critical habitat) are unnamed creek, unnamed creek, Carbon Creek, Las Flores Creek, unnamed creek, Piedra Gorda Creek, Peña Creek, Tuna Creek, Topanga Creek, Santa Inez Creek, Pulga Creek, Temescal Creek, unnamed creek, and Rustic/Santa Monica Creek.

Many of these streams, especially the unnamed creeks, are very small and do not support perennial flows. Most of them are ephemeral, likely do not provide suitable steelhead trout habitat, and are therefore not considered critical habitat. Twenty-one of the streams have either not been surveyed for steelhead or no data were found on them. Included in these un-surveyed streams are Calleguas Creek, La Jolla Creek, Deer Canyon Creek, Little Sycamore Creek, Walnut Creek, Santa Ynez Creek, Pulga Creek, Rustic/Santa Monica Creek, and 12 unnamed creeks. Following is a discussion of the streams within the project area, from west to east, for which data were available.

Ventura County

Big Sycamore Canyon Creek

Swift et al. (1993) indicate that steelhead have run in Big Sycamore Canyon Creek in recent years, but Keegan (1990b) concludes that it has a relatively low potential for steelhead restoration due to lack of perennial stream flow. In addition, because of the substrate in this creek (i.e., primarily sandy bottom), it is unlikely that Big Sycamore Canyon Creek supports suitable steelhead habitat. No information was found on steelhead habitat surveys, and no abundance data were located.

Calleguas Creek

There are conflicting reports on the presence/absence of steelhead in Calleguas Creek. Titus et al. (2001) report that there is no formal record of steelhead inhabitation, and NMFS states that Calleguas was historically, and is currently, unoccupied (NOAA 2000a); however, Swift et al. (1993) suggest that steelhead were present prior to 1970. Keegan (1990b) believes that there is little potential for steelhead restoration in Calleguas because of degraded habitat from sedimentation and poor water quality from agricultural runoff. The stream is perennial, has no known barriers to fish passage, and has an extensive and protected lagoon (Mugu Lagoon). No information was found on steelhead habitat surveys, and no abundance data were located for Calleguas Creek.

Los Angeles County

Arroyo Sequit

Small runs of steelhead have been reported in the Arroyo Sequit historically (Titus et al. 2001). The California Department of Fish and Game (CDFG) electrofished this stream in mid-November 1979 from Leo Carillo State Beach campground to 3.2 km upstream (Titus et al. 2001). Over 200 juvenile *O. mykiss* were present. Juvenile and adult steelhead have been observed in recent years. CDFG observed several steelhead up to 16 inches in length in November 1992 along with a high density of young-of-the-year (Titus et al. 2001). Five trout were captured in 1993. An adult steelhead was observed in Arroyo Sequit in March 2000 (Edmundson 2001). An angler caught several 8-inch trout (possibly steelhead) in September 2001 (Busteed 2001). Keegan (2001) indicates that steelhead rear in Arroyo Sequit for two years and emigrate on the third year, indicating that Arroyo Sequit has sufficient flow to support successful runs of steelhead.

The presence of adult and juvenile steelhead indicates that sufficient spawning and rearing habitats exist to support a healthy steelhead run. The small numbers of steelhead present in this stream indicate that habitat is present but has been degraded by numerous factors. Keegan (1990b) concluded that the steelhead run in Arroyo Sequit would be enhanced with increased stream flow and improvements for fish passage. No information on specific systematic steelhead habitat surveys was located for Arroyo Sequit.

Various Creeks

The most comprehensive sampling effort for steelhead in this area to date was a 1979 survey by CDFG. Thirty-one creeks were surveyed and electrofished if wet at the time of the survey. Steelhead were found in Arroyo Sequit, Malibu Creek, and Topanga Creek. Many of the remaining streams were dry and/or steelhead were not present. These include, beginning just south of Arroyo Sequit: Willow Creek, unnamed creek 0.8 km east of Willow Creek, San Nicholas Canyon Creek, Los Alisos Canyon Creek, Lachusa Canyon Creek, Encinal Canyon Creek, Steep Hill Canyon Creek, unnamed creek 0.8 km southeast of Steep Hill Canyon Creek, Trancas Canyon Creek, unnamed creek 1.3 km southeast of Trancas Canyon Creek, Zuma Canyon Creek, Ramirez Canyon Creek, Escondido Canyon Creek, Latigo Canyon Creek,

Solstice Canyon Creek, Corral Canyon Creek, Puerco Canyon Creek, Marie Canyon Creek, Winter Canyon Creek, unnamed creek 0.9 km east of Malibu Creek, unnamed creek 2.3 km east of Malibu Creek, Carbon Canyon Creek, Las Flores Canyon Creek, unnamed creek 0.4 km east of Las Flores Canyon Creek, Piedra Gorda Canyon Creek, Peña Canyon Creek, and Tuna Canyon Creek (Titus et al. 2001). Data indicating which of these streams held water were not available.

Because most of these streams were dry during the traditional wet season in 1979, many of them are probably incapable of supporting steelhead runs on a year-to-year basis; however, steelhead may use some of these streams in wetter years. No additional information was found on specific systematic steelhead habitat surveys, and no population abundance data were located.

Solstice Creek

Solstice Creek does not support any populations of steelhead trout (Busteed 2001; Kats 2001; Edmundson 2001; Dagit 2001; NPS 2000b). Historically the creek supported steelhead (Spina and Johnson 1999), but steelhead have not occupied it since the 1940s or 1950s (Dagit 2001; Spina and Johnson 1999), when the PCH was expanded and highway culverts were installed precluding steelhead from entering the creek. The NPS has conducted stream surveys in Solstice Creek and determined that there are no fish populations in the creek; however, the macroinvertebrate population is diverse and healthy (Busteed 2001). No historic population abundance data were located.

Malibu Creek

Malibu Creek is the southernmost Pacific coast stream within the Southern California Steelhead ESU. Historically, 14-pound steelhead were reportedly caught as they migrated upstream to the lower reaches of Las Virgenes Creek and Cold Creek to spawn (Titus et al. 2001). Titus et al. (2001) state that CDFG records indicate that there was a relatively large steelhead run in 1947 when the sandbar across the mouth of the stream was opened manually, and steelhead were still present in 1952. No steelhead were observed during CDFG surveys in 1969 and 1972 from Tapia Park to the Pacific Ocean; however, local residents reportedly caught steelhead below Rindge Dam in 1968, and found two steelhead that had washed ashore in February 1969. The CDFG electrofished Malibu Creek in 1979 and captured 10 steelhead/rainbow trout ranging in size from 5 to 7.5 inches in a single 183 m reach. Reportedly, 61 adult steelhead were observed below Rindge Dam in 1980. A survey in 1985 revealed no steelhead/rainbow trout (Titus et al. 2001).

A series of minor reconnaissance surveys have continued, and steelhead/rainbow trout were observed in 1986, 1987, and 1992 (Titus et al. 2001). Keegan (1990a) conducted quantitative surveys in 1990 and found that an apparently healthy population of juvenile steelhead were present below Rindge Dam. A total of 145 juveniles in three year-classes were observed, indicating that habitat and water quality are still sufficient to support steelhead runs. Keegan (1990a) found 22.4 steelhead, 17.5 steelhead, and 3.5 steelhead per 100 meters of pool/run habitat in the upper, middle, and lower reaches from Rindge Dam to the ocean, respectively. These data indicate that: 1) a successful spawn occurred in 1989, even with low rainfall and low

streamflows; 2) successful reproduction had occurred in at least three consecutive years; juvenile steelhead distribution was linked to quality of spawning and rearing habitat; and 3) summer flow and water temperature conditions were acceptable for juvenile steelhead rearing (Keegan 1990a). Franklin and Dobush (1989) state that Malibu Creek was thought to have an annual run of 20 to 60 steelhead.

Young-of-the-year steelhead were observed in Malibu Creek in 1989 and 1991, and two large adult steelhead were observed in 1992 (Page 2001). Apparently, no steelhead have been observed in Malibu Creek since 1992.

Topanga Creek

Topanga Creek is south of Malibu Creek and is therefore not within the Southern California Steelhead ESU (but it is within the proposed extension of critical habitat). Swift et al. (1993) indicate that steelhead have run in Topanga Creek since at least 1970. The CDFG electrofished Topanga in 1979 (Titus et al. 2001). Flow was intermittent and habitat quality was variable at the time of the survey. Steelhead were present (at least 12), but apparently no young-of-the-year were captured. Snorkel surveys have been conducted for the past two years and will be conducted again in spring 2002 (Dagit 2001). Three adult steelhead and possibly some young-of-the-year were observed in 2000, and steelhead were observed in 2001. Dagit (2001) has observed steelhead in Topanga Creek since 1998. These results indicate that steelhead reproduction may be occurring in Topanga Creek.

4.0 EXISTING FACTORS AFFECTING STEELHEAD AND CRITICAL HABITAT IN THE ACTION AREA

4.1 FACTORS AND CONDITIONS COMMON TO STREAMS WITHIN THE PROJECT AREA

Many existing factors in the SMMNRA have affected the steelhead and its habitat. Under natural conditions in this arid southern extent of its range, habitat conditions are very severe. Stream flows vary greatly, both seasonally and annually, resulting in hydrologically unstable streams. The majority of rain in this area falls during winter, which makes streamflows unreliable and results in increased water temperatures in the summer, especially in lower reaches that steelhead depend upon (Swift et al. 1993). This is also important because winter rains are necessary to produce enough of a flow in streams to breach sandbars that form at the mouths of these streams during low flow periods. These sandbars block the passage of steelhead between the streams they depend on to reproduce and rear young and the ocean, where different phases of their life cycle are completed (Titus et al. 2001). Because southern steelhead are better adapted to warmer water conditions (although they still require relatively cool, clean water year-round) than more northerly populations, they may be particularly important as genetic stocks for all steelhead (Swift et al. 1993).

In addition to these natural fluctuations in stream flow, the human population in and around the Los Angeles area has put more pressure on already limited water resources. Over the past 60 years, dams, water diversions, and road culverts have been built, and groundwater pumping has increased to meet the growing human demand for water. Hillside construction and road projects have increased the introduction of silt into steelhead streams, resulting in the elimination of spawning beds or smothering developing eggs (Finney and Edmundson 2001). Invasion of non-native fish species, road maintenance techniques, and existing land uses including public access and campgrounds in or near riparian areas have all affected the quality of steelhead habitat within the Southern California steelhead ESU.

Dams block steelhead access to upstream spawning and rearing areas, and regulate stream flow so that below-dam releases may be very low or eliminated. Diversions and pumping also remove water from stream channels, further reducing the flow and degrading water quality in streams and estuarine areas. All coastal streams within the project area, except Arroyo Sequit and Malibu Creek, flow through culverts under the PCH. Water flows through these culverts at a high velocity during high runoff periods, and steelhead typically migrate during the same high flow periods. Due to the velocity and concentrated flows within these culverts, steelhead are unable to migrate farther upstream. For this reason, Edmundson (2001) believes that culverts are the main limiting factor preventing upstream migration for steelhead within the project area. The effects of dams, water diversions, and road culverts include loss of migratory corridors between streams and the ocean and reduction or elimination of spawning and rearing habitats for steelhead (Titus et al. 2001). The interruption of the water regime through water extraction, introduction of silt, and blockage of fish passage have all contributed to the decline of Southern California steelhead (Finney and Edmundson 2001).

Water extraction and diversion have also contributed to the invasion of exotic fish species in coastal streams. When traditional flows are reduced, water quality is degraded and stream temperatures increase. These two factors allow exotic fish species that are better adapted to these conditions to colonize steelhead streams. These species prey heavily upon juvenile steelhead in rearing areas and compete for food and space within these streams thus reducing steelhead productivity.

The potential impact of postfire changes on small, isolated fish populations can be devastating (Spina and Tormey 2000). Because of the rapid growth of human activities and development in the area, fire frequencies have increased across much of the project area. Often, human-caused fires are large and intense, and occur during Santa Ana wind conditions. As a result, plant materials that protect soils are consumed more frequently and more intensely across wider areas, resulting in greater exposure of bare soils. This destabilizes soils and increases the amount of sediment that is available to enter streams and degrade steelhead spawning and rearing areas. The loss of streamside vegetation caused by fire also increases instream temperatures and decreases dissolved oxygen levels, resulting in further degradation of steelhead habitat.

Many of the roads adjacent to coastal streams in the SMMNRA follow steep, narrow valleys. Because natural disasters, including earthquakes and mass wasting occur frequently in this area, debris is often cast onto roads. The acceptable technique for clearing this debris is to “sidecast” the material off roads. Much of the debris moves downslope and ends up in coastal streams. This can increase sedimentation, affecting steelhead spawning and rearing areas and forming migration barriers that block access to spawning and rearing areas.

Land use activities throughout the coastal watersheds in the SMMNRA include livestock grazing, horticulture, recreational use of parklands, and residential development (Spina and Tormey 2000; Keegan 1990a). These activities cause increased sedimentation, increased water temperature, and degradation of water quality, which all contribute to the degradation of steelhead habitat. In addition, degraded tracks, paths, and roads exist throughout the project area. These destabilized areas are susceptible to increased rates of erosion and can contribute to increased sedimentation in streams. Heavy recreational use of tracks, paths, and roads further increases erosion and sedimentation in streams.

The gross effects of these existing conditions within the SMMNRA include loss of migratory corridors between the coastal streams and the ocean, and reduction or complete elimination of spawning habitat for adults and rearing habitat for juveniles (Titus et al. 2001).

4.2 FACTORS AND CONDITIONS OF STREAMS IMPORTANT TO STEELHEAD WITHIN THE PROJECT AREA

Information presented here was gathered from two main sources: 1) a literature search was conducted for pertinent journal articles and other resource agency, university, and consultant publications; and 2) interviews conducted with professional biologists, academicians, and

representatives of special interest groups for information from personal files and anecdotes based on personal observations. Arroyo Sequit, Solstice Creek, Malibu Creek, and Topanga Creek are influenced by all of the existing conditions mentioned above in Section 4.1. These streams will be described in further detail because additional data were found for them. The specific effects of the above-mentioned conditions on these four streams will be discussed in detail because they represent the highest quality steelhead habitat in the SMMNRA.

Arroyo Sequit

Arroyo Sequit is unique because it is one of two creeks within the project area that does not pass through culverts underneath the PCH. Keegan (1990b) concluded that the steelhead run could be enhanced with increased stream flow and improvements for fish passage. A significant portion of the watershed is managed by government agencies; however, private land also exists within the watershed. There are few existing residential developments in the Arroyo Sequit watershed, making it a fairly stable watershed.

The Leo Carillo campground exists within the riparian area at the mouth of Arroyo Sequit adjacent to the Pacific Ocean. The area in and around Leo Carillo State Park is currently designated as a high intensity management area, and would remain in this designation under the Preferred Alternative for the GMP/EIS. Two Arizona crossings exist at the campground. An Arizona crossing is constructed by pouring a concrete apron across a portion of the streambed to allow for a low water crossing for vehicles. These Arizona crossings act as upstream migration barriers to steelhead during high flow periods. The lower one is used for emergency evacuations by the L.A. County Lifeguards, and the upper one is used as a road crossing for a salvage yard (Edmundson 2001).

There is also existing riprap along the south bank to protect the campground against erosion. This riprap has degraded steelhead habitat; however, steelhead habitat improves approximately ¼ mile upstream, and steelhead depend on this stretch with riprap as a migration corridor.

Mulholland Road crosses the creek about two miles upstream of the PCH. Edmundson (2001) believes there may be a migration barrier at this location. Side casting of debris from Mulholland Road may also be a problem due to the narrow canyon and proximity of the road to Arroyo Sequit.

Despite these existing conditions, Edmundson (2001) believes that flow and the pool/riffle ratio are sufficient to rear steelhead, even in low flow conditions. Kats (2001), however, states that Arroyo Sequit has good steelhead habitat and has low numbers of exotic fish, but that low flow may limit steelhead.

Swift (2001) indicates that direct and indirect effects from a fire in the Arroyo Sequit watershed excluded steelhead from the creek several years ago, but that the creek has recovered and steelhead are once again occupying the creek.

Solstice Creek

The Solstice Creek watershed is another relatively undeveloped watershed. Most of the watershed is under the management of government agencies. Spina and Johnson (1999) conducted a steelhead habitat survey of Solstice Creek. The study area included the creek from the confluence with the Pacific Ocean upstream 1.8 miles to a natural waterfall barrier adjacent to Tropical Terrace. The creek is spring fed and provides sufficient flow for steelhead (Edmundson 2001; Spina and Johnson 1999). Two highway culverts, four Arizona crossings, and several other man-made structures preclude steelhead from the creek (Spina and Johnson 1999). Edmundson (2001) indicated that the California Department of Transportation (Caltrans) is in the process of removing the PCH road culvert. Spina and Johnson (1999) indicate that steelhead were present in the creek until the mid-1940s when the PCH culvert was installed.

Spina and Johnson (1999) conclude that, because of the presence of relatively deep pools in the upper reaches of the study area, an abundance of aquatic macroinvertebrates, lush riparian vegetation, accumulations of clean gravel for spawning areas, and abundant interstitial spaces, existing habitat features in Solstice Creek are sufficient to support steelhead spawning and rearing if migration barriers are removed.

Malibu Creek

Several studies have been conducted in the Malibu Creek watershed in recent years (Franklin and Dobush 1989; Keegan 1990a). A significant portion of the Malibu Creek watershed is managed by government agencies, but due to its large size, there is also a substantial amount of private land in the watershed.

Malibu Creek is the second of two creeks within the project area that does not pass through culverts under the PCH (Edmundson 2001). Franklin and Dobush (1989) conducted a habitat assessment for steelhead in Malibu Creek. They found that the highest quality spawning habitat is concentrated in narrow gorge sections between the mouth of Cold Creek and a point 2 km below Rindge Dam. The highest quality rearing habitat is concentrated in narrow gorge sections below Cold Creek and above Las Virgenes Creek. Currently, 86 percent of spawning habitat and 65 percent of rearing habitat is inaccessible to steelhead as a result of four migration barriers: Rindge Dam, a natural falls near the tunnel on Malibu Canyon Road, a concrete apron at the stream gage below Cold Creek, and a concrete road crossing in Malibu Creek State Park (Franklin and Dobush 1989). By providing passage at these four barriers, spawning and rearing habitat would increase 590 percent and 180 percent, respectively. Steelhead use of pools was also observed to be greater than that of runs, and pools are thought to be an important summer habitat (Franklin and Dobush 1989; Spina and Tormey 2000).

Perennial flow conditions have existed in Malibu Creek since the Tapia Water Reclamation Facility (above Cold Creek) began discharging treated effluent to Malibu Creek in the late 1960's. Cold Creek appeared inadequate to allow migration by steelhead due to the low flows and channel morphology characteristics (Franklin and Dobush 1989). The aquatic macroinvertebrate community appeared low in diversity; this may be related to the bi-weekly introduction of an insecticide into Cold Creek and Malibu Creek. This program is for the control

of blackflies, but likely decreases populations of other stream insects that represent important food sources for steelhead (Franklin and Dobush 1989).

At present, steelhead in Malibu Creek are limited to the 4.2 km reach of stream below Rindge dam. Keegan (1990a) indicates that good quality adult and juvenile (spawning and rearing) habitat is found in the narrow gorge extending downstream from the dam for approximately 2 km. Excellent gravels, appropriate channel morphology and abundant cover in the form of boulders, deep water and surface turbulence, provide good spawning habitat in this section. Spawning habitat is non-existent in the lower broad valley section. Good rearing habitat occurs in pockets throughout the study area, but is most abundant in the gorge (Keegan 1990a).

The fish community below Rindge Dam includes steelhead, arroyo chub (*Gila orcutti*), Pacific lamprey (*Lampetra tridentata*), and exotic species such as bluegill (*Lepomis macrochirus*), green sunfish (*Lepomis cyanellus*), largemouth bass (*Micropterus salmoides*), brown bullhead (*Ictalurus nebulosis*), and channel catfish (*Ictalurus punctatus*) (Keegan 1990a). The fish community downstream of Rindge Dam is dominated by introduced species (Keegan 1990a; Kats 2001; Page 2001). At the time of the Keegan (1990a) study, there was a lower abundance of age 0+ steelhead in the lower reach as compared to the upper reach near the dam. Keegan attributes this difference to a reduction in available habitat and increased predation in the lower reach as compared to the upper reach. Higher water temperatures due to degraded riparian habitats in the lower reach also favor introduced species and provide for a more stressful environment for steelhead. In coastal streams with degraded upstream habitat (such as Malibu Creek), most steelhead emigrate soon after emergence, and because of the absence of adequate streamflows, the lagoon habitat becomes the only rearing habitat available (Keegan 1990a). Keegan (1990a) concludes that, given the presence of a lagoon and adequate instream habitat, Malibu Creek has the potential for larger steelhead production. Kats (2001) and Page (2001) also indicate that the presence of exotic fish limits juvenile steelhead survival in Malibu Creek, but that the stream provides good habitat and sufficient flows to support steelhead.

Topanga Creek

The Topanga Creek watershed is largely privately owned. Topanga Creek is an especially sensitive system because it is located in a narrow canyon with a highly traveled road, utilities, and the creek in close proximity. Dagit (2001) has recently conducted aquatic surveys, including habitat and snorkel surveys for steelhead, in Topanga Creek. High quality steelhead habitat begins north of Brookside Drive approximately one mile upstream of the Pacific Ocean and extends all the way upstream to the town of Topanga (approximately four miles from the coast). Flow is not consistent through this stretch, and there are some low waterfalls, but there are no upstream migration barriers (Dagit 2001). Dagit (2001) also indicates that there are relatively few exotic species in this reach of Topanga Creek. Swift (2001) indicates that no tributaries to Topanga Creek are sufficient to support steelhead. Page (2001) concludes that the creek provides suitable habitat for steelhead, but also states that the estuary is in poor condition west of the PCH, and likely does not provide suitable rearing habitat for steelhead.

As with other streams in the project area with roads adjacent to them, side-casting of debris poses a threat to steelhead. Water quality may also be a problem here due to the number of

residences along the creek. Residents tend to dump trash in or near the creek causing a non-point source pollution threat (Edmundson 2001; Dagit 2001).

5.0 PROPOSED ACTION

5.1 MISSION AND GOALS

In 1997, the National Park Service, California State Parks, and the Santa Monica Mountains Conservancy created a joint mission statement to guide the GMP/EIS through its evolution. The mission statement follows:

The mission of the Santa Monica Mountains National Recreation Area is to protect and enhance, on a sustainable basis, one of the world's last remaining examples of a Mediterranean ecosystem and to maintain the area's unique natural, cultural and scenic resources, unimpaired for future generations. The SMMNRA is to provide an inter-linking system of parklands and open spaces that offer compatible recreation and education opportunities that are accessible to a diverse public. This is accomplished by an innovative federal, state, local, and private partnership that enhances the region's quality of life and provides a model for other parks challenged by urbanization.

Many goals for the GMP/EIS were developed by incorporating planning issues, the mission statement, relevant laws, core values, policies of the three lead agencies, and public comments concerning desired future conditions for the park. These categories include: resource condition goals, land use and ownership goals, visitor experience goals, education and interpretation goals, access and transportation goals, and operations goals and are addressed further in the GMP/EIS.

5.2 PROGRAM CATEGORIES

The GMP/EIS analyzes five general program categories or actions. Table 1 reflects the summary of alternatives included in the GMP/EIS (Table 8 in the GMP/EIS), and has been modified to reflect only the actions proposed under the Preferred Alternative that may affect steelhead or critical habitat. The table is organized into the five general program categories. These include:

- Resource Management Character and Condition
- Visitor Experience
- Facility Development
- Management Activities
- Transportation

Specific actions are described under the Actions Common to All Alternatives and the Preferred Alternative columns. These specific actions are further categorized under low intensity, moderate intensity, and high intensity management areas.

ACTIONS COMMON TO ALL ALTERNATIVES		PREFERRED ALTERNATIVE
Program Categories		Low Intensity – (80%) Moderate Intensity – (15%) High Intensity – (5%)
Resource Management Character and Condition	<ul style="list-style-type: none"> Watersheds and coastal resources would be protected and preserved through watershed management practices. Estuaries and lagoons would be restored to their natural state. Sensitive historic and ethnographic resources would be protected and preserved. Alien plant species would be eradicated, where appropriate, and habitat for animal and plant populations would be maintained and restored. Steelhead trout would be reintroduced into Solstice Creek. Highly sensitive natural areas would be protected. Recreation would be dispersed throughout the SMMNRA. 	<ul style="list-style-type: none"> Steelhead trout reintroduction would be attempted in Solstice Creek, Malibu Creek and Arroyo Sequit. Non-historic trails and recreation would be relocated away from sensitive areas. Wildlife corridors would be identified and protected. Natural processes would be allowed to continue unimpeded except when active manipulation to manage for native biological diversity or rare, threatened or endangered species or communities is deemed appropriate. Watershed/marine interface zones would be protected and restored. Restore disturbed non-historic areas in park to natural conditions.
Visitor Experience	<ul style="list-style-type: none"> Educational experiences would be enhanced through actions mentioned below. 	<ul style="list-style-type: none"> Resource compatible recreation would be encouraged (hiking, wildlife observation) Environmental education programs would be increased. Only designated trails would be multi-use. Pictographs would be in low intensity areas. Pictographs would be interpreted at visitor centers and at exhibits in high intensity areas. Scenic coastal boat tour docking would be offered, docking at Santa Monica Pier and Malibu Pier (with visitor contact station).
Facility Development	<p>Low Intensity</p> <ul style="list-style-type: none"> A portion of The Juan Bautista de Anza National Historic Trail through the Simi Hills would be realigned. <p>Moderate Intensity</p> <ul style="list-style-type: none"> Environmental education day camp would be located at Solstice Canyon. Backbone Trail would be completed. Day camp would be located at Rancho Sierra Vista to provide more educational programs about contemporary and traditional Native American cultures. An accessible trail would be established at Liberty Canyon. <p>High Intensity</p> <ul style="list-style-type: none"> Cheeseboro Canyon trailhead would be expanded. Coastal education center would be developed at Leo Carrillo State Park, and campground would be rehabilitated. Temescal Canyon educational day camp would be expanded. Mission Canyon trailhead would be developed, with toilets, parking and interpretive facilities. Research and information center would be provided at CSUCI campus. 	<p>High Intensity</p> <ul style="list-style-type: none"> Mugu Lagoon Visitor Education Center would be located on the western end of the NRA off the PCH. Circle X would become a primitive overnight education camp. Paramount Ranch would include facilities for a film history center and museum; western town set would be reused for filming and film production would be encouraged. White Oak Farm would offer interpretive and educational programs. The barn at Rancho Sierra Vista would be reused as an environmental education center. The Morrison Ranch House would be rehabilitated to reflect the ranching period. The cultural landscape surrounding the house would be maintained. Morrison Ranch House and cultural landscape would be restored. Visitor education center would be located at Malibu Bluffs. Significant cultural, natural, and scenic resources of the Gillette Ranch would be adaptively reused for joint administration, curation and environmental and cultural education. 415 PCH serve as eastern park gateway, providing visitor orientation. Exhibits would interpret southern California culture and the history of the PCH and the terminus of Route 66. Visitor information sites would be located at LAX and El Pueblo in downtown Los Angeles. Educational day camp program at WODOC would be expanded. Backbone Trail would be completed with eight additional group or individual overnight campsites along the trail.
Management Activities	<ul style="list-style-type: none"> NPS and CSP would jointly administer operations when feasible. Information and telecommunication technology would be used to promote more efficient park operations. Upper Las Virgenes Canyon and Burro Flats, land adjacent to Mulholland Gateway Mountain Park, and Liberty Canyon wildlife corridor would be added to park. The principal strategy of protection for the National Park Service would be through agreement and cooperation rather than fee acquisition. 	<ul style="list-style-type: none"> The NPS would play a greater role in the administration of Mugu Lagoon in cooperation with the U.S.Navy. Recommended boundary study areas would be: the western escarpment of the Santa Monica Mountains, the area around Las Virgenes Reservoir, Conejo Valley, Ladyface Mountain, Triunfo Canyon, Marvin Braude Mulholland Gateway Park, the area east of Hidden Valley, Stone Canyon and the area north and west of Yerba Buena Road. The area north into the Simi Hills and Conejo Valley would protect critical wildlife habitat and open space through agreements with land management agencies. Land prone to repeated hazard due to natural disasters would be proposed to FEMA for accelerated acquisition. An archeological district of the SMMNRA would be documented and nominated to the national register.
Transportation	<ul style="list-style-type: none"> Visual and recreational elements of Mulholland Drive and Highway would be promoted and preserved. Limiting of roadway expansion would be supported. Transportation centers would be developed. Transportation education would be provided. Improved management of PCH would be supported. Alternative fuels would be used. Bicycling on paved routes and developed trails, as well as bicycle parking racks, would be encouraged as an alternative form of transportation. The park would promote transit operations and ride-sharing programs. 	<ul style="list-style-type: none"> Mulholland would be cooperatively managed to emphasize its continuity, historic significance and scenic values. A tour shuttle loop would travel Mulholland, PCH, and Malibu Canyon Road connecting points of interest as well as picking up and dropping off hikers and surfers. This loop plus PCH from Pt Mugu to Sequite Point and the rest of Mulholland east of its intersection with Malibu Canyon Road would also be a scenic corridor.

Five management areas were developed for the GMP/EIS and would be applied under the Preferred Alternative as described in the GMP/EIS. The five management areas described in the Preferred Alternative include:

- Low Intensity Areas
- Moderate Intensity Areas
- High Intensity Areas
- Scenic Corridor Areas
- Community Landscape Areas

The majority of the SMMNRA would be designated as low intensity. Moderate intensity areas would act as a buffer around urban areas and scenic corridors in some instances. Small pockets of concentrated high intensity activities would be located in non-sensitive or previously developed areas. The majority of the general program categories and specific actions would occur in moderate and high intensity management areas and, thus, would have the greatest potential to affect steelhead. The Preferred Alternative would protect significant natural and cultural resources while providing compatible recreation and educational opportunities to a diverse public. Figure 2 illustrates the management areas and facilities proposed under the Preferred Alternative. From this point on, this BA is organized to analyze effects to steelhead according to the management areas. This follows the organization in the GMP/EIS. Program actions are addressed within the framework of the management areas (i.e., low, moderate, or high intensity).

5.2.1 Low Intensity Areas

These areas would be designated to preserve natural and cultural resources, protect resources from impacts of visitors and facility development, restrict activities to horseback riding, mountain biking, and hiking on designated trails, prohibit motorized equipment in designated wilderness areas, allow only harmonious development with the natural setting, close/revegetate some fire roads, close or re-route some non-historic trails, monitor resource deterioration, allow compatible scientific research, and manage fire to minimize landscape disturbance.

Approximately 80 percent of the park area would be designated low intensity. Facilities would be maintained in a relatively primitive manner to preserve the visitor experience. The only modification to this environment within the SMMNRA boundary would be for the purposes of protecting resources from use-related impacts. In terms of the program category Management Activities, a boundary study would be suggested for the western escarpment of the Santa Monica Mountains to buffer some of the impacts of the California State University Channel Islands (CSUCI) expansion and associated development on the western edge of the park. The area around Conejo Valley, Triunfo Canyon, the area east of Hidden Valley, the area north and west of Yerba Buena Road, and the area north into the Simi Hills and Conejo Valley would protect critical wildlife habitat and open space through agreements with land management agencies. In the north, a boundary adjustment study would be conducted in the Simi Hills area northwest of Cheeseboro, north and west of Yerba Buena Road and northeast of Las Virgenes Canyons respectively to preserve wildlife corridors, habitat and critical open space (Table 1).

There are certain properties that are scheduled to be included in the SMMNRA boundary in the near future. These properties include Upper Las Virgenes Canyon, the land adjacent to San Vicente Mountain Park, and the Liberty Canyon wildlife corridor. Legislation would be required to make these changes, and any future acquisition, to the extent they involve the NPS, would be limited to the acceptance of donations (Table 1).

The development of agreements with other land management agencies and Caltrans to maintain open space in critical wildlife habitat linkage areas would be accomplished. The level of monitoring of these wildlife connections would be increased (Table 1).

Under the program category Resource Management Character and Condition, watersheds and coastal resources would be protected and preserved through coordinated watershed management practices. Lagoons, coastal wetlands, and marine interface areas would receive focused protection and management through the use of general agreements with land use regulatory agencies, research agencies, and university research, and estuaries and lagoons would be restored to their natural state. Steelhead reintroduction would be initiated in Solstice Canyon. Steelhead enhancement would take place in the Malibu Creek and Arroyo Sequit watersheds, and possibly Topanga Creek. Lagoons, coastal wetlands, and interface areas would receive focused attention. Wildlife corridors would be identified and protected, and natural resources would be allowed to continue unimpeded except when active manipulation to biological diversity or rare, threatened of endangered species or communities is deemed appropriate (Table 1).

Under Facility Development, a portion of the Juan Bautista de Anza National Historic Trail through the Simi Hills/NPS lands would be marked with commemorative signs, and the Backbone Trail would be completed with eight additional group or individual overnight campsites along the trail (Table 1).

In addition to the preceding management activities specific to low intensity management areas, certain activities are proposed to take place within low intensity, moderate intensity, and high intensity areas. The following activities would not be specific to a given management area.

Under the program category Resource Management Character and Condition, alien plant species would be eradicated, where appropriate, and habitat for animal and plant populations would be maintained and restored. Highly sensitive natural areas would be protected, recreation would be dispersed throughout the SMMNRA, watershed/marine interface zones would be protected and restored, and disturbed non-historic areas in the park would be restored to natural conditions (Table 1).

Under the program category Visitor Experience, resource compatible recreation would be encouraged (hiking, wildlife observation), environmental education programs would be increased, only designated trails would be multi-use, pictographs would be in low intensity areas, and pictographs would be interpreted at visitor centers and at exhibits in high intensity areas (Table 1).

Under the program category Management Areas, land prone to repeated hazard due to natural disasters would be proposed to the Federal Emergency Management Administration (FEMA) for accelerated acquisition (Table 1).

5.2.2 Moderate Intensity Areas

These areas would be designated to preserve natural and cultural resources, allow harmonious development with natural settings, provide only essential visitor services and facilities, preserve/rehabilitate historic structures, limit activities to horseback riding, mountain biking, and hiking on designated trails, allow low-impact camping, build boardwalks to protect resources where necessary, build picnic areas/equestrian access sites, limit campground development, restrict utility and fire roads for administrative use, maintain trails with motorized equipment, close or re-route some trails, manage fire to minimize landscape disturbance, and minimize impacts from search and rescue missions/fire suppression.

Approximately 15 percent of the area within the park boundary would be moderate intensity. In terms of Management Activities, boundary adjustment studies would be proposed for Las Virgenes Reservoir, Ladyface, Marvin Braude Mulholland Gateway Park, and Stone Canyon to protect critical open space and preserve wildlife corridors (Table 1).

In terms of Facility Development, an environmental education facility would be established at Solstice Canyon where minor improvements would be made to previously disturbed areas to improve parking, restroom facilities and the outdoor classroom experience, the Backbone Trail would be completed, a day camp would be located at Rancho Sierra Vista, and an accessible trail would be established at Liberty Canyon (Table 1).

Under Resource Management Character and Condition, steelhead would be reintroduced into Solstice Creek (NPS 2000b) (this project is currently under separate consultation and will not be analyzed in this BA), Malibu Creek, and Arroyo Sequit. Non-historic trails and recreation would be relocated away from sensitive areas (Table 1).

In addition to the preceding management activities specific to moderate intensity management areas, certain activities are proposed to take place within low intensity, moderate intensity, and high intensity areas. The following activities would not be specific to a given management area.

Under the program category Resource Management Character and Condition, alien plant species would be eradicated, where appropriate, and habitat for animal and plant populations would be maintained and restored. Highly sensitive natural areas would be protected, recreation would be dispersed throughout the SMMNRA, watershed/marine interface zones would be protected and restored, and disturbed non-historic areas in the park would be restored to natural conditions (Table 1).

Under the program category Visitor Experience, resource compatible recreation would be encouraged (hiking, wildlife observation), environmental education programs would be increased, only designated trails would be multi-use, pictographs would be in low intensity areas,

and pictographs would be interpreted at visitor centers and at exhibits in high intensity areas (Table 1).

Under the program category Management Areas, land prone to repeated hazard due to natural disasters would be proposed to the Federal Emergency Management Administration (FEMA) for accelerated acquisition (Table 1).

5.2.3 High Intensity Areas

These areas would be designated to protect resources from impacts of visitors with a higher degree of infrastructure and facilities development, allow frequent sights and sounds of people and development, develop parking areas for beaches or frequently used trails, allow overnight camping including group camping, allow picnicking, swimming, surfing, and kayaking, provide full visitor services and facilities, build boardwalks to protect resources where necessary, use gravel, compacted soil, or pavement for trails, use pavement or gravel for trailhead parking areas, maintain trails with motorized equipment, close, re-route, or revegetate some non-historic trails, manage fire to minimize landscape disturbance, minimize impacts from search and rescue missions/fire suppression, and permit emergency response staging.

Approximately 5 percent of the area within the park boundary would be designated as high intensity; however, most of these areas occur along the coast and within or near designated critical habitat for steelhead. These areas are currently under high intensity management.

Under the Visitor Experience program category, a scenic coastal boat tour docking would be offered, docking at Santa Monica Pier and Malibu Pier (Table 1).

The development of the following park facilities would occur within the SMMNRA in high intensity use areas (NPS 2000a) (Table 1):

- ***Mugu Lagoon Visitor Education Center*** would be located at the western most end of the SMMNRA off the PCH. This new facility would emphasize use of sustainable energy and materials through a working education demonstration. Mugu Lagoon, managed by the U.S. Navy, is the largest coastal wetland in California outside the San Francisco Bay area. This facility would provide an important interpretation point for the estuarine ecosystem. The proposed site for the education center would be located in an already disturbed area off the PCH. A boardwalk around the lagoon would allow visitors an opportunity to experience the lagoon system. This facility would be located within Calleguas Creek watershed; steelhead are not currently present, nor is there evidence that they were present historically; therefore, this watershed is not within designated critical habitat for steelhead.
- ***Circle X Ranch*** would become a primitive overnight camp with expanded facilities for group camping. Sustainable architectural design practices would be used and resources would be protected in the siting of any new structures. The facilities would offer improved access to backcountry recreation trails, including the Backbone Trail. Circle X Ranch is located near Arroyo Sequit, approximately six miles upstream of the coast in the Arroyo Sequit

watershed. Potential affects may include increased sedimentation, increased groundwater pumping, and increased pathogens entering the waterway.

- **The campground at Leo Carrillo State Beach** would be rehabilitated to integrate the campground with natural riparian processes. Interpretation of the riparian setting would be provided to educate visitors on the sensitive condition of this coastal landmark. A coastal education center would be developed at Leo Carrillo State Beach with exhibits on marine life and the culture of the Chumash. A 75-car parking lot is planned, and the California State Parks hopes that this facility would accommodate 200,000 visitors a year. The Leo Carrillo campground is located adjacent to, and within, the riparian area of Arroyo Sequit just upstream of the Pacific Ocean, within steelhead critical habitat.
- **Paramount Ranch** would include facilities for a film history education center and museum. Film production would be encouraged as a means to preserve a traditional use associated with the facility. The western town set at Paramount Ranch and the surrounding landscape would be adaptively reused for filming. Parking and circulation would be improved to accommodate visitation while protecting the cultural landscape. The ranch is located above Malibu Lake within the Malibu Creek watershed. Potential affects may include increased sedimentation, increased groundwater pumping, and increased pathogens entering the waterway.
- **White Oak Farm** is located near the intersection of Mulholland Highway and Las Virgenes Canyon Road and would offer interpretive and education programs. The farm is located near Las Virgenes Creek, which flows into Malibu Creek. Potential affects may include increased sedimentation, increased groundwater pumping, and increased pathogens entering the waterway.

In addition to these facilities, eight other education centers and/or visitor centers would be constructed or would see an increase in visitor use. These facilities are: the barn at Rancho Sierra Vista, a scenic coastal boat tour between Santa Monica Pier and Malibu Pier, a visitor education center at Malibu Bluffs, an administration, environmental, and cultural education center at the Gillette Ranch, the 415 PCH visitor center, a visitor information site at Los Angeles International Airport, William O. Douglas Outdoor Center, a visitor information site in downtown L.A. at El Pueblo, the Morrison Ranch House would be rehabilitated, Temescal Canyon day camp would be expanded, and Mission Canyon trailhead would be developed with toilets, parking, and interpretive facilities. None of these facilities is within or would affect designated critical steelhead habitat; therefore, they will not be analyzed further in this BA.

Under Management Activities, the NPS would play a greater role in the administration of Mugu Lagoon in cooperation with the U.S. Navy (Table 1).

Under the Transportation program category, NPS would enter into a general agreement with Caltrans to support the concept of encouraging use of mass transit options instead of enlarging the PCH or any of the other state routes through the SMMNRA. Visual and recreational elements of Mulholland Drive would be promoted and preserved, limiting of roadway expansion would be supported, improved management of PCH would be supported, and alternative fuels would be

used. Bicycling on paved routes and developed trails, as well as bicycle parking racks, would be encouraged as an alternative form of transportation. In addition, a tour shuttle loop would travel Mulholland, PCH, and Malibu Canyon Road connecting points of interest as well as picking up and dropping off hikers and surfers (Table 1). NPS would enter into general agreements with the surrounding communities and other regional agencies to explore possible transit options to serve the SMMNRA and expand existing service to include regular transit service on weekends. NPS would support neighboring communities in creating park and ride facilities that would be used by transit operations serving the SMMNRA, further reducing the need to expand roads in the project area.

In addition to the preceding management activities specific to high intensity management areas, certain activities are proposed to take place within low intensity, moderate intensity, and high intensity areas. The following activities would not be specific to a given management area.

Under the program category Resource Management Character and Condition, alien plant species would be eradicated, where appropriate, and habitat for animal and plant populations would be maintained and restored. Highly sensitive natural areas would be protected, recreation would be dispersed throughout the SMMNRA, watershed/marine interface zones would be protected and restored, and disturbed non-historic areas in the park would be restored to natural conditions (Table 1).

Under the program category Visitor Experience, resource compatible recreation would be encouraged (hiking, wildlife observation), environmental education programs would be increased, only designated trails would be multi-use, pictographs would be in low intensity areas, and pictographs would be interpreted at visitor centers and at exhibits in high intensity areas (Table 1).

Under the program category Management Areas, land prone to repeated hazard due to natural disasters would be proposed to the Federal Emergency Management Administration (FEMA) for accelerated acquisition (Table 1).

5.2.4 Scenic Corridor Areas

The GMP/EIS supports the use of lower speed limits and the development of additional scenic pullouts on routes designated as scenic corridors. Where practical, a greenway trail system would be developed that connects the pullouts, and promotes pedestrian and bicycle use. Areas where this may be practical include portions of the Mulholland corridor and the western portion of the PCH. The roadside environment along the scenic corridors would be improved to promote traffic safety while being consistent with the scenic character of the recreation area.

Scenic corridors are designated for Mulholland Highway, PCH, and Malibu Canyon Road. A tour shuttle would travel Mulholland, PCH, and Malibu Canyon Road, connecting points of interest such as the Adamson House, Malibu Lagoon, Gillette Ranch, White Oak Ranch, Paramount Ranch, Leo Carrillo State Beach, and Point Dume State Preserve in a circular route. A shuttle service could serve these multiple points of interest as well as dropping and picking up hikers and surfers at designated points along this loop. The Mulholland Highway would be

cooperatively managed to emphasize its continuity, historic significance, and scenic values. The establishment of agreements and design review boards would ensure that proposed developments are evaluated and found to be consistent with the scenic values of the corridors.

5.2.5 Community Landscape Areas

Community Landscape Areas are defined by the Santa Monica Mountains Conservancy as areas with unique architectural and/or landscape quality such as Topanga Canyon and Laurel Canyon. For areas identified as community landscapes, the NPS, CSP, and SMMC would provide local decision-makers with the resource data and technical assistance necessary to maintain the unique character of these areas, consistent with the overall goals and objectives of the draft GMP/EIS.

5.3 AVOIDANCE, COMPENSATION, AND MONITORING

5.3.1 Mitigation Measures Specified in the GMP/EIS

Because no specific construction plans or management plans have been developed for the GMP/EIS, general mitigation measures were described that would apply to, and be incorporated into, specific plans in the future. The following is a summary of the mitigation measures for the Preferred Alternative taken directly from the GMP/EIS. Although NPS is the lead agency at the SMMNRA, there are a number of State and local agencies that have land management authority within the SMMNRA boundaries. Some activities are proposed by agencies other than NPS and would occur outside of NPS direct jurisdiction. NPS will therefore support the given agency in following the proposed mitigation measures in this BA, and NPS will follow all mitigation measures on its own projects. For measures that are under the control of NPS (or can be applied to specific NPS actions), the word “would” is used to indicate the measure. For measures not under NPS control, the word “should” indicates the measure. Mitigation measures that do not relate to steelhead or its habitats have been excluded.

Soils and Geology

- Soil erosion control measures such as sediment retention ponds, silt fencing, or slope stabilization techniques would be included in all facility development-specific plans and would be considered when implementing any of the planned activities. This would reduce the amount of sediment entering drainages during construction.
- A qualified individual within the administering agencies would review all grading and construction plans prior to approval.
- A qualified geologist would conduct geotechnical and geologic hazard investigations prior to project implementation with a focus on projects in areas of concern. Such areas include projects involving hillside terrain, proximity to active or potentially active faults, proximity to landslide areas, and areas of possible liquefaction.

Water Resources

- A construction storm water management plan would be prepared by a qualified individual for all construction activities affecting one or more acres to minimize soil disturbance. The plan would consider best management practices such as temporary on-site water treatments, which include silt fences and sedimentation ponds.
- Fueling and servicing of construction equipment would not occur within 100 feet of a water body or drainage area unless adequate spill control/containment is provided.
- The administering agencies would incorporate the treatment of the runoff from developed areas into facility design plans to reduce pollutants reaching waterways wherever feasible to accomplish long-term mitigation. Restroom facilities would be planned to minimize the delivery of pathogens to groundwater or surface water.
- If on-site surface or groundwater would be used as a potable water source for new camp facilities, the administering agencies would study sources of drinking water for camps to avoid the over-extraction of water.

Flood Plains

- During siting of structures and use areas for proposed facilities near a flood plain, an engineering evaluation would be conducted by a qualified engineer to identify the boundaries of the 100-year flood plain. Structures and use areas would be located outside the flood plain boundaries wherever possible.

Biological Resources and Wetlands

- The administering agencies would avoid undisturbed native vegetation, wetlands, other sensitive habitats, and habitat linkage areas through careful siting of facilities. New development would be sited in previously disturbed areas, thereby avoiding or minimizing impacts on undisturbed native vegetation and reducing potential sedimentation in streams.
- Lagoons, coastal wetlands, and marine interface areas would receive focused protection and management using general agreements with land use regulatory agencies, research agencies, and university research.
- Areas temporarily disturbed during construction would be re-contoured and re-vegetated with appropriate native plant species, and appropriate fuel management zones would be maintained around developed structures.
- Erosion control measures such as sediment retention basins, silt fencing, and slope stabilization techniques would be implemented for surface disturbing activities, such as construction or trail maintenance, to help reduce sedimentation.

- Pre-project surveys would be conducted by a qualified biologist prior to project implementation in the appropriate season for listed species, including steelhead. Wetland delineations would also be conducted as appropriate.
- The administering agencies would consult with the USFWS, NMFS, U. S. Army Corps of Engineers (ACOE) (for wetlands), and CDFG during the detailed planning phase of a project, if any listed species or its habitat may be affected during a proposed action.
- Monitoring by a qualified biologist would be required for surface disturbing activities in, or in close proximity to, sensitive vegetative and wildlife resources (e.g., wetlands, riparian areas, listed species habitat).
- Fire clearance zones would be incorporated into the planning of developments. Educational efforts, such as posting fire hazard signs, would be effective in reducing the likelihood of visitor caused fires, and their resultant impacts on biological resources.
- If vegetation were lost or disturbed from any visitor-related activity, the area would be rehabilitated or revegetated with species from an appropriate native plant palette from local seed/plant sources to help reduce potential sedimentation.
- The administering agencies would evaluate all proposed actions for their effects on habitats and on habitat connectivity to avoid further habitat fragmentation.
- New developments would be excluded or minimized, to the greatest extent practicable, from existing wildlife corridors, to ensure the continued exchange of genes and individuals between wildlife populations within and adjacent to the SMMNRA.

Visitor Experience

- Improve existing trails, and create new trails and adequate camping areas in moderate intensity use areas using practices to help avoid impacts to water resources.

Utilities

- Additional facilities should provide on-site water supply/storage as necessary to reduce pressure on water suppliers and to increase the reliability of facility water supply.
- Wastewater disposal systems should be planned and designed for each proposed facility at the time it is proposed to ensure adequate wastewater capacity.
- The location of the nearest solid waste facility with sufficient capacity to accommodate the required additional waste flow should be identified by the administering agencies during facility planning stages. The availability of solid waste capacity should be confirmed for each facility before construction to insure that pathogens do not enter watercourses.

5.3.2 Additional Recommended Mitigation Measures Specific to Steelhead

In addition to the mitigation measures proposed in the GMP/EIS, measures more specific to steelhead should also be implemented to minimize potential effects to steelhead. Although NPS is the lead agency at the SMMNRA, there are a number of State and local agencies that have land management authority within the SMMNRA boundaries. Some steelhead-specific mitigation measures apply to activities proposed by agencies other than NPS and would occur outside of NPS direct jurisdiction. NPS will therefore support the given agency in following the proposed mitigation measures, and NPS will follow all mitigation measures on its own projects. For measures that are under the control of NPS, the word “would” is used to indicate the measure. For measures not under NPS control, the word “should” indicates the measure.

- A large-scale steelhead habitat and population estimate monitoring program should be implemented in the SMMNRA in order to establish a more coherent baseline for abundance and distribution of steelhead. Habitat surveys of all potential steelhead coastal streams in the SMMNRA should be conducted, and population estimate surveys should be designed from information gathered from the habitat surveys. This monitoring program should be designed so that subsequent surveys can be conducted and data can be compared to evaluate the health of steelhead populations. This effort will need to be conducted in cooperation with and will depend on participation by a variety of agencies in the SMMNRA. To date, NPS has initiated “rapid assessments” of stream conditions as part of its stream monitoring program (described above). In the near future, NPS will be working with other agencies to expand these efforts to incorporate broader water quality and stream conditions into its overall biological monitoring program. Support for these efforts is anticipated from the NPS Inventory and Monitoring Program as part of the park’s Vital Signs Monitoring Program. NPS expects NMFS will be a close partner in these efforts. In addition to large-scale surveys, as specific projects are sited and designed, NPS will collaborate with NMFS to develop an acceptable survey protocol that will help determine whether the proposed action has adversely affected steelhead or critical habitat, the magnitude and extent of the impacts and effects, and whether the effects have been fully mitigated. The protocol would:
 - Define a process for measuring the quality and quantity of habitat that is affected by various activities proposed under the GMP;
 - Outline the compensatory mitigation program that will be implemented to offset impacts of various management activities on instream and riparian habitat;
 - Define a procedure for measuring and detecting spatial and temporal changes in habitat quality and quantity; and
 - Define a protocol that will track performance of the mitigation program, respond to new information or changing conditions, and detect and reconcile deficiencies or problems in a timely manner.

Specific projects that are located within or may affect steelhead critical habitat would utilize this protocol.

- Culverts along the PCH are one of the principal factors precluding steelhead from most coastal streams (Finney and Edmundson 2001; Edmundson 2001). Once steelhead habitats are identified, an attempt should be made to remove culverts from high priority streams.
- Construction of facilities within steelhead critical habitat should not take place during the winter rainy season (January to March), including all disturbances within 300 feet of the normal high water line.
- Fire events can have potentially devastating effects on isolated populations of steelhead such as the Southern California population. Post-fire steelhead habitat surveys should be conducted in all potential steelhead streams in burned watersheds to determine if a steelhead rescue and/or habitat restoration is necessary (Spina and Tormey 2000). These efforts will need to be conducted in cooperation with and will depend on participation by a variety of agencies in the SMMNRA.
- In order to minimize impacts from increased groundwater pumping at new facilities, water could be trucked to campgrounds and other facilities. County planners should also limit the amount of future groundwater pumping and water diversions for future developments within coastal drainages.
- Riparian vegetation should be maintained and enhanced where possible, on both private and public land, in order to enhance instream temperature and water quality conditions.
- Lagoon habitats are sometimes the only available rearing habitat in the absence of adequate instream conditions (Keegan 1990a). A program should be developed to improve the condition of these habitats.
- One of the main goals of the GMP/EIS is to increase educational opportunities. This is extremely important for steelhead survival in the SMMNRA. The ecology of the steelhead, its habitat requirements, and the importance of upland habitats in watershed management need to be emphasized wherever possible. Posters, signs, and brochures should be made readily available to visitors and residents in the area.
- Limiting public access to steelhead streams or areas of streams that are important for steelhead survival would also help minimize direct impacts to riparian vegetation and bank erosion. Law enforcement could also be increased to assure that limitations are not violated.

The following four streams should be considered high priority streams for the continued existence of the Southern California steelhead. Specific mitigation measures have been identified below for each stream. In addition, Dagit (2001) indicates that Las Flores Creek and Trancas Creek should be considered for future potential restoration projects.

Arroyo Sequit

- Even with the relatively advanced amount of development within this watershed, steelhead still inhabit this stream and suitable habitat still exists. In order to minimize impacts from the Leo Carillo campground rehabilitation, and to improve steelhead habitat, the two Arizona crossings at the state park should be removed (Edmundson 2001). There is also a potential migration barrier about two miles upstream at the Mulholland Road crossing that could be made passable for steelhead.
- To mitigate potential impacts to water quality due to increased pathogens, restroom facilities and associated septic systems would be carefully located to minimize delivery of pathogens to surface water.
- Side-casting of road debris into the stream and floodplain should also be minimized or ended all together. This would require coordination with the L.A. County road maintenance department.
- Conditions for steelhead in Arroyo Sequit would be improved with implementation of the GMP/EIS as long as the appropriate mitigation measures are implemented.

Solstice Creek

- In order to re-establish a steelhead population in Solstice Creek, the highway culverts at the PCH, four Arizona crossings, and several man-made structures should be removed in order to restore the migration corridor. These small barriers could be removed at a low cost. If this is accomplished, it is likely that the existing habitat could support a steelhead population (Spina and Johnson 1999).
- The NPS recently prepared an Environmental Assessment (NPS 2000b) proposing to rehabilitate facilities at Solstice Canyon and remove one Arizona crossing, and Caltrans is working on removing the PCH culverts (Edmundson 2001). Funds for the Caltrans effort have been secured through an Environmental Enhancement and Mitigation (EEM) grant. In addition, efforts are underway by the NPS to complete a plan to remove all remaining barriers from upper Solstice Creek, in cooperation with the Resource Conservation District of the Santa Monica Mountains and the California Coastal Conservancy.
- Conditions for steelhead in Solstice Creek would be improved with implementation of the GMP/EIS as long as the appropriate mitigation measures are implemented.

Malibu Creek

- There is not a culvert at the PCH preventing steelhead from entering the stream mouth; however, there are four major migration barriers and two low-water migration barriers. The two low-water migration barriers are located below the first major barrier (Rindge Dam) and are located at Cross Creek Road (culverts) and at the downstream end of

Malibu Canyon (abandoned pipeline). Both of these could be removed or modified at a relatively low cost for easy fish passage (Franklin and Dobush 1989). The removal of the four major barriers would grant access to the remaining 86 percent of spawning habitat and 65 percent of rearing habitat that is blocked by the major barriers (Franklin and Dobush 1989; Keegan 1990a).

- Effluent from the Tapia Water Reclamation Facility should be monitored closely to ensure that water quality is suitable for steelhead, and a temperature study should be conducted so that the facility may help regulate water temperatures in favor of the steelhead (Franklin and Dobush 1989).
- The section of Malibu Creek between the lagoon and the mouth of Malibu Canyon flows through a relatively broad valley with little topographic shading for the creek. Riparian vegetation could be enhanced in this section to provide cooler temperatures for steelhead during the summer.
- Side-casting of road debris into the stream and floodplain should also be minimized or ended all together. This would require coordination with the L.A. County road maintenance department.
- Conditions for steelhead in Malibu Creek would be improved with implementation of the GMP/EIS as long as the appropriate mitigation measures are implemented.

Topanga Creek

- Although Topanga Creek is not within the Southern California Steelhead ESU (but is within the proposed extension area), certain mitigation measures should be implemented to enhance conditions for steelhead. The culvert at the PCH should be removed because it is the only migration barrier below the Town of Topanga (Dagit 2001).
- Access should be limited along the creek from the ocean to milepost 2.75 on Topanga Canyon Boulevard. This corridor is important to steelhead and was privately held until recently. Now that it is public, more people can access it, which may be detrimental to steelhead habitat (Dagit 2001).
- Angling should be limited (i.e., fewer access points and catch and release) or prohibited in Topanga Creek and regulations should be strictly enforced.
- The estuary is in poor condition west of the PCH and needs to be improved (Page 2001).
- Side-casting of road debris into the stream and floodplain should also be minimized or ended all together. This would require coordination with the L.A. County road maintenance department. In addition, road pullouts should be removed to prevent excessive trash dumping into the stream (Dagit 2001).

- Conditions for steelhead in Topanga Creek would be improved with implementation of the GMP/EIS as long as the appropriate mitigation measures are implemented.

6.0 POTENTIAL EFFECTS OF THE PREFERRED ALTERNATIVE ON STEELHEAD AND ITS CRITICAL HABITAT

The Preferred Alternative may have both positive and negative impacts on steelhead. In general, the development of facilities would have negative effects. Increasing the overall designation of low intensity areas to 80 percent (from the current 30 percent) would have positive effects on steelhead.

Minor adverse impacts are expected on water resources in the areas that are proposed for development with visitor centers and expanded campgrounds. These effects would include reduced water quality, loss of riparian vegetation, increased potential for flooding, and the potential for reduced stream flows resulting from water extraction. Direct short-term effects would occur during construction, but would be minor assuming the mitigation measures discussed above are implemented. Indirect long-term effects would occur from increased visitor usage, but would also be minor assuming mitigation measures are implemented. Watersheds and streams would be positively impacted by the designation of more low intensity areas even considering the proposed developments in high and moderate intensity areas. The overall effect would be a much higher proportion of low intensity areas compared to moderate and high intensity areas as currently exists within the project area.

One impact from additional trail campsites and other developments would be caused by the extraction of potable water. The source of drinking water for these camps would need to be considered carefully, as removing too much from the existing stream system may result in widespread and substantial degradation of water flow and habitat quality. While the precise rate of water consumption for these facilities is not known, it is estimated that only a relatively small increase in water demands compared to existing water demands would be required to support the proposed land uses and facilities, because adequate water supplies and facilities currently exist to support the projected water demands of the Preferred Alternative (NPS 2000a).

Several of the proposed facilities are located in close proximity to wetland resources. These facilities would be located near, but not within wetlands, and would not significantly impact wetlands or water quality.

There would also be beneficial effects to steelhead under the Preferred Alternative. The Preferred Alternative includes changing the majority of intensity use designations from high or medium to low in the area of the Malibu and Calleguas Creeks and Arroyo Sequit flood plains. This would reduce access to and duration of activities in the flood plain and would have beneficial effects because disturbance in the riparian areas would noticeably decrease. Some of the degraded tracks and paths would be restored in the low intensity areas. This would increase the general health of watersheds by reducing erosion and sedimentation, and by reducing the amount of potential pathogens entering waterways.

6.1 LOW INTENSITY AREAS

6.1.1 General Direct and Indirect Effects

Low intensity areas would be designated to preserve natural resources, and protect resources from impacts of visitors and facility development. The only modification to these environments within the SMMNRA boundary would be done to accomplish these goals. The designation of low intensity areas would be beneficial to steelhead by promoting healthy watersheds and upland habitats, healthy lagoons, coastal wetlands, and marine interface areas, and improving steelhead habitat in selected streams. Currently, 30 percent of the lands within the SMMNRA are designated low intensity. Under the Preferred Alternative, 80 percent would be designated low intensity. Due to the increase in amount of low intensity areas from existing conditions, the designation of low intensity areas may affect, but is not likely to adversely affect, steelhead or steelhead critical habitat, and would likely provide beneficial effects.

6.1.2 Specific Direct and Indirect Effects

Topanga Creek

There are no proposed facility developments in the Topanga Creek watershed. The lower third of the watershed is designated low intensity. One currently designated high intensity area upstream in the Town of Topanga would be reduced to moderate intensity management under the Preferred Alternative. Topanga Creek is one of the streams that will be dedicated to protection/restoration of watershed and marine interface zones. Implementation of the Preferred Alternative may affect, but is not likely to adversely affect, steelhead or proposed steelhead critical habitat (NOAA 2000b), and would likely provide beneficial effects.

6.2 MODERATE INTENSITY AREAS

6.2.1 General Direct and Indirect Effects

Moderate intensity areas would be designated to preserve natural resources, and act as a buffer between low and high intensity areas. Moderate intensity areas would cause minimal direct and indirect effects due to higher visitor numbers, development of only “essential” facilities, low impact overnight camping, and increased trail use. The potential effects could include increased sedimentation in streams due to increased erosion, lower flows caused by groundwater pumping, and increased pathogens in streams due to human waste. Currently, 60 percent of the lands within the SMMNRA are designated moderate intensity. Under the Preferred Alternative, 15 percent would be designated moderate intensity. Due to the potential for increased impacts and the reduction in moderate intensity areas from 60 percent to 15 percent, implementation of the Preferred Alternative as proposed may adversely affect steelhead or steelhead critical habitat, and may also have beneficial effects.

6.2.2 Specific Direct and Indirect

Solstice Creek

Existing facilities in Solstice Canyon have deteriorated. A project to upgrade these facilities and remove an Arizona crossing which impedes the upstream migration of steelhead trout has been proposed. This project was addressed in a separate Environmental Assessment (NPS 2000b). This project would reduce or eliminate potential pathogens from entering the creek, and remove one of several migration barriers to steelhead trout. Solstice Creek is also one of the streams that will be dedicated to protection/restoration of watershed and marine interface zones. This action may affect, but is not likely to adversely affect, steelhead or steelhead critical habitat, and would likely have a beneficial effect if the appropriate mitigation measures are implemented.

6.3 HIGH INTENSITY AREAS

6.3.1 General Direct and Indirect Effects

High intensity areas would be designated to preserve natural resources with a higher degree of infrastructure and facilities development. High intensity areas would cause direct and indirect effects due to high visitor numbers, development of “full service” facilities including overnight camping, and increased trail use. The potential effects could include increased sedimentation in streams due to increased erosion, lower flows caused by groundwater pumping, increased pathogens in streams due to human waste, and degraded riparian areas due to increased use within floodplains. Currently, 10 percent of the lands within the SMMNRA are designated high intensity. Under the Preferred Alternative, 5 percent would be designated high intensity. Due to the potential for adverse effects and a reduction in high intensity areas from existing conditions, implementation of the Preferred Alternative as proposed may adversely affect steelhead or steelhead critical habitat, and may also have beneficial effects.

6.3.2 Specific Direct and Indirect

The major drainages in the SMMNRA include Calleguas and Malibu Creeks as well as Arroyo Sequit. The Preferred Alternative proposes facilities and uses near these streams that would include either modified or new structures or would increase access to, and extend the duration of, activities within these watersheds. Although the specific locations for the structures and use areas for these facilities have not been determined, potentially adverse long-term impacts could result due to the designation of high intensity use in portions of the Malibu, Calleguas, and Arroyo Sequit flood plains.

Direct short-term impacts could occur during construction phases of the proposed facilities. Clearing vegetation during construction and grading activities leaves soils exposed to erosion during rainfall, which could impact stream turbidity and suspended sediment levels. This could in turn affect light penetration and visibility in the streams, and spawning and rearing areas for steelhead. Accidental spills of fuel and other fluids could occur during the servicing of construction equipment and could impact waterways if these activities are conducted near waterways or without berms or other means of secondary containment.

The proposed facilities of the Preferred Alternative could adversely affect the water quality after construction activities as well. Impacts could include an increase in the runoff volumes and rates from these areas. This impact could potentially cause streambed and bank erosion, habitat scour, and increased instream sedimentation. Runoff from these areas could also contain pollutants such as hydrocarbons and heavy metals from vehicles and other sources. These pollutants could cause minor short- and long-term impacts on the health of steelhead. Septic systems that are not properly located, designed, and constructed could also cause short- and long-term impacts to the quality of surface or ground water.

Calleguas Creek

Mugu Lagoon Visitor Center and CSUCI Research and Information Facility would be located in the vicinity of Calleguas Creek flood plain. There would be no effect to steelhead or steelhead critical habitat from implementation of this portion of the Preferred Alternative because Calleguas Creek is not occupied by steelhead, nor is it designated as critical habitat for steelhead.

Arroyo Sequit

The development of Circle X Ranch and the rehabilitation of the Leo Carillo campground would occur in the Arroyo Sequit watershed. Circle X ranch would become a primitive overnight camp with group camping. Leo Carillo campground would be rehabilitated to integrate the campground with natural riparian processes. Leo Carillo campground would be redesigned to help reduce impacts on steelhead. The new design would provide for a more stable riparian area and newly designed restrooms. This action would reduce sedimentation in the stream and reduce the potential for pathogens entering the waterway.

With both of these developments, visitor use would likely increase. In general, the potential for erosion hazards (and subsequent sedimentation), pathogens, groundwater pumping, and riparian disturbance would increase with increased visitor usage. These facilities would also act as good education centers to supply information on steelhead to visitors, which may help reduce visitor impacts.

Both areas would experience minimal direct, short-term disturbance associated with construction. These effects would be minimized with implementation of the proposed mitigation measures. Indirect, long-term effects may occur due to increased visitor usage, but these would be minimized by implementation of the proposed mitigation measures. Long-term beneficial effects could occur with visitor education and the rehabilitation of the stream. If the proposed projects are properly designed, stream improvements are carried out, and mitigation measures are implemented, the addition of these facilities may adversely affect steelhead and steelhead critical habitat, and may also provide beneficial effects.

Malibu Creek

Paramount Ranch Film History Center, Las Virgenes Environmental Education Center, Gillette Ranch Joint Administration and Environmental Education Center, Malibu Bluffs, Northern Gateway Visitor Center, and Malibu Pier Visitor Contact Station are located in the vicinity of the

Malibu Creek flood plain. Direct short-term disturbance associated with construction would be minimal. These effects would be minimized by implementation of the proposed mitigation measures. Indirect, long-term effects may occur due to increased visitor usage, and would include erosion hazards (and subsequent sedimentation), increased pathogen input to the stream, and groundwater pumping. These impacts would be minimized by implementation of the proposed mitigation measures. Malibu Creek is one of the streams that would be dedicated to protection/restoration of watershed and marine interface zones. If the proposed projects are properly designed, stream improvements are carried out, and mitigation measures are implemented, the addition of these facilities may adversely affect steelhead and steelhead critical habitat, and may also provide beneficial effects.

6.4 GENERAL AND SPECIFIC EFFECTS OF SCENIC CORRIDOR AREAS

Mulholland Highway, Malibu Canyon Road, and the PCH would be designated Scenic Corridor Areas. No specific developments are proposed at this time, but pullouts may be constructed at certain locations along these roads to allow safe stopping points. The construction of pullouts would cause direct short-term disturbance, especially if these areas are within the Arroyo Sequit or Malibu Creek watersheds, but disturbance would be minimal. Indirect long-term effects would include increased sedimentation and an increase in the potential for pathogens to enter waterways. If the proposed projects are properly designed and mitigation measures are implemented, the addition of these facilities may adversely affect steelhead and steelhead critical habitat.

6.5 GENERAL AND SPECIFIC EFFECTS OF COMMUNITY LANDSCAPE AREAS

Because no projects or additional activities are scheduled to occur within Community Landscape Areas, there are no anticipated impacts to steelhead or steelhead habitat.

7.0 CUMULATIVE EFFECTS

Cumulative effects include the effects of future State, tribal, local or private actions that are reasonably certain to occur in the action area considered in this biological assessment. Future Federal actions that are unrelated to the proposed action are not considered in this section because they require separate consultation pursuant to Section 7 of the Endangered Species Act of 1973, as amended. No tribal actions would occur due to the absence of tribal governments within the SMMNRA.

Local actions that are reasonably certain to occur include a creek discharge avoidance study which looks at alternatives to avoid discharging recycled water from Tapia Water Reclamation Facility into Malibu Creek, and two proposed reservoirs at Stone Canyon and Encino Reservoir.

Private development projects that are reasonably certain to occur include the Ahmanson Ranch housing and commercial development (Malibu Creek watershed), Pepperdine University Upper Campus Development (Malibu Creek watershed), Lake Eleanor Hills housing development (Malibu Creek watershed), Westlake YMCA (Malibu Creek watershed), Rancho Malibu Hotel (Malibu Creek watershed), Ramirez Canyon Park office development (Ramirez Creek watershed), and Malibu Terrace housing development (Malibu Creek watershed). These proposed developments within the SMMNRA and surrounding areas would result in increased run-off and impacts to water quality and steelhead habitat. The Ahmanson Ranch EIR reported moderate cumulative impacts involving degradation of Malibu Creek from runoff. The majority of these projects can be expected to have similar effects on watersheds within the SMMNRA.

The Preferred Alternative involves construction of several facilities within the Malibu Creek, Arroyo Sequit, and Solstice Creek watersheds resulting in minor impacts to water resources and steelhead habitat from increased runoff and pollutants. The Preferred Alternative would contribute to cumulative impacts caused by reasonably foreseeable state, local, and private projects; however, the contribution would be minimal due to the small size of the proposed facilities relative to the large development projects affecting the watershed. Beneficial effects to steelhead and steelhead habitat would occur from the implementation of a higher proportion of low intensity management areas and through the rehabilitation of steelhead streams.

Many existing conditions affecting steelhead and steelhead habitat would also continue during the implementation and execution of the Preferred Alternative and would contribute to cumulative effects. These include existing dams, water diversions, groundwater pumping, road culverts, roads, road maintenance, and fire suppression.

8.0 COORDINATING INTERAGENCY REVIEW

Future actions proposed under the GMP should undergo individual assessment and coordination according to guidance defined by the implementing regulations for Interagency Coordination (50 CFR 402). The following protocol outlines the framework that NPS will follow for review of future actions (i.e., project-level review) proposed under the GMP:

- NPS will evaluate all future proposed actions for adverse effects to steelhead and critical habitat;
- NPS will determine whether proposed actions are likely or not likely to adversely affect steelhead and critical habitat;
- NPS will submit its determination to NMFS along with support for its determination;
- To ensure consistency with the GMP and the programmatic biological opinion, NMFS and NPS staff will review the proposed action and preliminary effects determination or preliminary biological assessment;
- NPS will prepare a final effects determination or biological assessment including recommendations for modifications to minimize impacts to steelhead and critical habitat provided by NMFS;
- NPS will ensure the delivery of the final determination or biological assessment to the appropriate NMFS representative;
- NPS will fulfill the required interagency coordination to complete the consultation process either informally or formally, whichever NMFS believes is necessary;
- NPS will receive a biological opinion or concurrence letter from NMFS before the proposed action is implemented.

9.0 EFFECTS SUMMARY AND DETERMINATION

Localized projects that are proposed under the Preferred Alternative have the potential to cause adverse effects to steelhead and steelhead habitat. Additional facilities would be built and visitor use is expected to increase. Potential adverse effects include increased bank erosion, increased stream sedimentation, increased pathogens entering waterways, and increased water temperatures. Mitigation measures, if implemented, would minimize these effects.

The designation of 80 percent low intensity, 15 percent moderate intensity, and 5 percent high intensity management areas within the project area would benefit steelhead over the long-term. The percentage of low and moderate intensity areas (95 percent) would improve overall watershed condition and stream health by protecting larger portions of the watersheds and by discouraging or prohibiting high impact uses within low intensity areas.

Overall, implementation of the Preferred Alternative for the SMMNRA GMP/EIS **may affect, and is likely to adversely affect**, the Southern California ESU of the steelhead and its critical habitat, but would also provide **beneficial effects**. This determination is based on the effects of implementing the Preferred Alternative, as described above, including the implementation of mitigation and monitoring measures.

This programmatic BA addresses the overall effects of the GMP/EIS on steelhead which provides a general overview of the direction of management for the SMMNRA over the next 15 to 20 years. It is anticipated that additional consultation will be necessary between the NPS and NMFS as individual projects are developed during implementation of the Preferred Alternative. The purpose of this additional review process would be to assess project-specific effects to steelhead, ensure that the effects are not substantially different than those assessed in this BA, and to amend this BA if necessary to reflect any substantially different effects that may arise from the proposed project. If project-specific effects are found to be the same as, or are not substantially different than the effects discussed in this BA, additional consultation should not be needed, and informal consultation would be sufficient.

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Glossary

ACHP	Advisory Council on Historic Preservation
ACOE	Army Corps of Engineers
ADA	Americans with Disabilities Act
ADT	Average Daily Traffic
AFY	Acre Feet per Year
APE	Area of Potential Effect
ARPA	Archeological Resources Protection Act
AST	Arroyo Southwestern Toad
CALTRANS	California Department of Transportation
CDFG	California Department of Fish and Game
CDMG	California Division of Mines and Geology
CEQ	Council on Environmental Quality
CEQA	California Environmental Quality Act
CNDDB	California Natural Diversity Database
COSCA	Conejo Open Space Conservation Authority
CSP	California State Parks
CSUCI	California State University Channel Islands
CWA	Clean Water Act
CZMA	Coastal Zone Management Act
DB	Decibel
DBA	A-weighted Decibel
DSR	Disturbed Sensitive Resource
EIR	Environmental Impact Report
EIS	Environmental Impact Statement
ESHA	Environmentally Sensitive Habitat Area
FHWA	Federal Highways Administration
GIS	Geographic Information Systems
GMP	General Management Plan
HABS / HAER	Historic American Buildings Survey / Historic American Engineering Record
HCM	Highway Capacity Manual
HCS	Highway Capacity Software
Interim Plan	Malibu/Santa Monica Mountains Interim Area Plan
LADWP	Los Angeles Department of Water and Power
LARWQCB	Los Angeles Regional Water Quality Control Board
LCP	Local Coastal Plan
Leq	Equivalent Sound Level
Leq(h)	Hourly Equivalent Sound Level
LOS	Level of Service
LSCR	Lower Stone Canyon Reservoir
LUP	Land Use Plan
LVMWD	Las Virgenes Municipal Water District
MRCA	Mountains Recreation and Conservation Authority
MWD	Municipal Water District



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NAC	Noise Abatement Criteria
NAP	North Area Plan (Santa Monica Mountains)
NCCP	Natural Communities Conservation Planning
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NMFS	National Marine Fisheries Service
NPDES	National Pollutant Discharge Elimination System
NPS	National Park Service
NRHP	National Register of Historic Places
OS	Open Space
PAL	Parks as Laboratories
PCH	Pacific Coast Highway
POS	Public Open Space
RCP	Regional Comprehensive Plan
RMP	Regional Management Plan
RMP	Resource Management Plan
RTP	Recreational Transit Program
SCAQMD	South Coast Air Quality Management District
SCAG	Southern California Association of Governments
SEA	Significant Ecological Area
SHPO	State Historic Preservation Office
SMMC	Santa Monica Mountains Conservancy
SMMZ	Santa Monica Mountain Zone
SMMNRA	Santa Monica Mountains National Recreation Area
SUP	Special Use Permit
TWRF	Tapia Water Reclamation Facility
USCR	Upper Stone Canyon Reservoir
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
VCFC	Ventura County Flood Control District
VCOG	Ventura Council of Governments
VOC	Volatile Organic Compound/Chemical
VPD	Vehicles Per Day
VSS	Visitor Safety Services
WODOC	William O. Douglas Outdoor Classroom

Glossary of Terms

Adverse impact	the degree to which a resource will be negatively affected because it cannot be mitigated or avoided.
Batholith	a body of intrusive igneous rock.
Breccia	a rock made up of highly angular coarse fragments
Carrying capacity	type and level of visitor use that can be accommodated while sustaining the desired resource and visitor experience conditions in the park.
Channel geometry	the configuration of the deepest portion of a stream, bay, or strait through which the water current flows.
Community landscape	an area of unique architectural and landscape quality.
Compatible recreation	recreation use that is matched to the area and does not compromise the nature and characteristics of the area or cause physical damage.
Conglomerate	rounded, water-worn fragments of rock or pebbles cemented together by another mineral substance.
Cultural resources	archeological, historic, and ethnographic sites or objects.
Disturbance	pertaining to the man-made movement of earth and soils.
Ecosystem	the community of plants, animals, and bacteria and the related physical and chemical environment.
Estuarine	pertaining to a river, stream, or swamp drainage channel adjacent to the sea in which the tide ebbs and flows.
Exotic flora and fauna	those plants and animals that are not native to the area and have been intentionally or accidentally introduced.
Geomorphic	pertaining to the formation of the earth and its surface.
Habitat connectivity	a system of natural habitat areas, or corridors that connect larger areas of habitat, that are vital to sustain wildlife populations.
Harmonious development	expansion or building where future anticipated uses would have no or low potential for environmental impact.



Intensity	existing in a high degree, activity, or energy.
Isohyetal	line on a map connecting points receiving equal rainfall.
Littoral drift	the movement along the coast of gravel, sand, and other material composing the bars and beaches.
Metamorphic	of or relating to a change effected by pressure, heat, and water that results in a more compact and more highly crystalline condition.
Mitigation measures	modifications to a proposal or alternative that lessen the intensity of its impact on a particular resource.
Non-compatible activity	those activities that have potential to cause harm to the area and compromise the nature and characteristics of the area or cause physical damage.
Paleoecology	the study of ancient plants and animals in relation to the physical and chemical environment.
Pathogen	any micro-organism or virus that can cause disease.
Phylogeny	the history or development of any plant or animal species.
Pictographs	images on rock made by painting using vegetal or mineral paints.
Riparian corridor	the vegetation and habitat along the banks of a body of water, usually a river or stream.
Sedimentation	the action or process of forming or depositing sediment.
Sensitive species	those species that may or may not be endangered or threatened and are considered by the land managing agency to be susceptible to impact.
Taxonomy	the classification of plants and animals into phyla, species, etc.
Watershed	the area drained by a river or river system.

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