

SANTA MONICA MOUNTAINS CONSERVANCY

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September 23, 2019

Community Studies West Section
Los Angeles County Department of Regional Planning
320 W. Temple Street, Room 1362
Los Angeles, California 90012

**Draft Update Santa Monica Mountains North Area Plan
and Community Standards District**

Dear Community Studies Section:

The Santa Monica Mountains Conservancy (Conservancy) offers the following comments on the Draft Update of the Santa Monica Mountains North Area Plan (NAP) and Community Standards District (CSD). The Conservancy extends its overall support to the NAP and the CSD as currently presented in draft form. A few modification are recommended below.

In combination, the documents accomplish so much up front to steer development into the least ecologically, hydrologically, and visually damaging areas of a property. The documents cover every angle of resource protection and accompanying figures clearly impart the key information. A clear development road map is valuable to both developers and reviewing public agencies. The requirements for up front biological reviews and constraints mapping greatly minimizes conflict and maximizes the retention of the whole spectrum of biological resources. The NAP and the CSD collectively reward projects that work with the constraints. The Conservancy supports the proposed incentive program based on retiring lots as long as the retired lots can be demonstrated to have residential development potential.

The Conditional Use Permit (CUP) requirements for grading thresholds and haul routes are great incentives to avoid uniform flat pad development in favor stair stepped development more congruous with the mountain terrain.

The prohibition of non-wildlife permeable fencing outside of development areas is a key feature to continue habitat connectivity through private lands.

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The careful mapping of the most sensitive habitat type S1 creates strong justification for its numerous protections including the required Minor CUP for exploratory earthwork and drilling in S1.

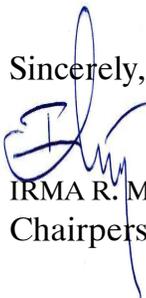
The 18-foot height limit in Scenic Resource Area encourages architects to design homes that work with the landscape in the most visually sensitive areas of the mountains.

Protection of native trees and non-native trees that provide high habitat or historic value in the proposed NAP and CSD will preserve integral resources for birds and small mammals in both wild and developed areas, help mitigate urban heat island effects as climate change increases regional temperatures, and stabilize hillsides vulnerable to erosion.

Habitat restoration and enhancement in Mediterranean ecosystems in the face of global warming presents great challenges even for professionals. As the proposed NAP and CSD greatly rely on vegetation restoration and enhancement, it is critical that such mitigation be well defined and enforceable. The efficacy of such enforcement will require the County to hire additional biologists with adequate expertise in habitat management.

The importance of accelerating a program for habitat impact fees for S1 and S2 habitat impacts cannot be over emphasized. The Conservancy recommends adoption of an interim in lieu fee option. Upland habitat restoration is particularly challenging because of the lack of dry season soil moisture. In enough cases, the ecosystem benefit of additional permanent habitat protection outweighs onsite habitat restoration/enhancement. Both restoration and offsite habitat protection are expensive endeavors in the Santa Monica Mountains. Fortunately, it appears that these efforts will be measured in the thousands of square feet and not acres because of the proposed protections. A good starting point for such an interim fee is \$250,000 per acre or approximately \$6 per square foot.

Please address any future correspondence to Paul Edelman, Deputy Director Natural Resources and Planning, at the above letterhead address or by phone at (310) 589-3200 ext. 128.

Sincerely,

IRMA R. MUÑOZ
Chairperson