

**SANTA MONICA MOUNTAINS CONSERVANCY**

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June 29, 2020

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Los Angeles County Department of Regional Planning  
320 W. Temple Street - 13<sup>th</sup> Floor  
Los Angeles, California 90012

**Santa Monica Mountains North Area Plan  
and Community Standards District Update  
Draft Environmental Impact Report Comments (SCH No. 2018071065)**

Dear Ms. Hua:

The Santa Monica Mountains Conservancy (Conservancy) offers the following comments on the above referenced Draft Environmental Impact Report (DEIR). The Conservancy finds the DEIR to be thorough, thoughtful, and accurate in regards to its conclusion that the Santa Monica Mountains North Area Plan and Community Standards District Update (Update) will not result in any significant adverse environmental impacts. Most assuredly the Update will comprehensively reduce adverse environmental impacts across the spectrum of issues covered in the California Environmental Quality Act. We concur that the proposed project is the Environmentally Superior Alternative in the DEIR.

In order to ensure that impacts associated with the North Area Plan and Community Standards District addressed in the DEIR are mitigated, the DEIR includes many mitigation measures that steer development on individual parcels. A key element of the North Area Plan and Community Standards District is the habitat designation system - S1-S4. Such sensitivity designations form the essential core of a habitat constraints system that forces projects to avoid sensitive habitat from beginning of the development siting process. The Conservancy also supports the revised scenic resources and open space policies. The expanded protection measures for Native, Heritage, Historic, and Oak trees are further essential to avoid sensitive resources rather than struggle to weakly mitigate for their losses. Habitat restoration is difficult and fraught with failure. Impact avoidance is superior but to address this issue we encourage the retention and further development of more stringent habitat restoration guidelines to reflect the true, long terms costs of success.

The required Biological Inventory or Biological Assessment should factor in a broad array of constraints. The current mitigation ratios for S1 and S2 habitat of 3:1 and 2:1, respectively, can further push new development to less sensitive portions of a lot. The 500

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cubic yard grading threshold for a Conditional Use Permit also steers development into working with the landscape constraints rather than fighting them. One has to keep in mind that 500 cubic yards fills 50 super ten dump trucks, which is no small amount of dirt.

The Conservancy urges the County to have a maximum disturbance area of 10,000 square feet (less 300 feet of driveway length) unless a project provides an overwhelming public benefit through some combination of permanent deed restricted open space, dedicated trail easements within proven terrain and breadth to ensure their utility, and the retirement of lots through the TDC process. The document needs to be clear if such dedications would occur as Offers to Dedicate or Direct Dedications. In either case it is imperative that the standards include a requirement that the applicant pay all necessary costs for a public agency to accept any such dedications. Mitigation is not complete unless there are sufficient secured mechanisms to ensure it is finalized.

The recent events regarding vulnerable (not full size adult horses) livestock that have led to the issuance of depredation of Santa Monica Mountains lions make it paramount to include enough measures in the Community Standards District to require lion-proof standards for all newly permitted nighttime livestock enclosures. Because of many factors including cost, it is improbable that excessively large lion proof enclosures would be constructed. So in that vein of thought, it makes good sense to eliminate a requirement for wildlife permeable fencing on lion proof structures. For example a 25-foot by 25-foot enclosure of fencing has minimal capability for adverse environmental impacts if the siting follows the Community Standards regarding s1 through s3 habitat categories.

Sincerely,

IRMA MUÑOZ  
Chairperson