

<b>PROPOSED PROJECT</b>						
<b>Malibu Parks Public Access Restoration/ Enhancement Plans</b>					<i>updated: 1/21/2010</i>	
<b>Utility Trenching Estimate (linear feet, lf.)</b>						
<b>Park Name</b>	<b>Ramirez</b>	<b>Escondido</b>	<b>Latigo</b>	<b>Corral</b>	<b>Malibu Bluffs</b>	<b>Sub-Total</b>
Joint Trenching	255	70	475	3,000	760	4,560
Dry Utilities Only	10	200	-	30	80	320
Potable Water Only	400	865	170	1,400	3,775	6,610
Fire Water Only	-	20	30	270	100	420
Sanitary Sewer	550	-	-	-	-	550
<b>Sub-Total per Site</b>	<b>1,215</b>	<b>1,155</b>	<b>675</b>	<b>4,700</b>	<b>4,715</b>	<b>12,460</b>
<b>Total Trench Length</b>	<b>12,460</b>	<b>lf.</b>				

<b>PROPOSED PROJECT</b>													
<b>Malibu Parks Public Access Restoration/ Enhancement Plans</b>											updated: 1/18/2010		
<b>Public Parking Space Quantities (Number of Proposed Spaces)</b>													
Park Name	Ramirez*				Escondido	Latigo	Corral**	Malibu Bluffs				Sub-Total	
Parking Area	1	2.1	2.2	2.3	-	-	-	1	2	3	4		
Standard Angled	8	9	1	10	10	8	19	13	15	12	3	108	
Standard Parallel	-	-	-	-	1	-	-	-	-	-	-	1	
RV/ Trailer	-	-	-	-	3	-	-	-	-	-	-	3	
ADA Accessible	2	2	4	-	2	1	2	3	2	4	-	22	
<b>Sub-Total per Area</b>	36				16	9	21	52				134	
<b>Total No. of Spaces</b>	<b>134</b>				<i>(does not include existing, reserved, maintenance, fire equipment parking, etc.)</i>								
<i>* Parking Area 2.1-2.3 lots are along Kanan Dume Rd.</i>													
<i>** 11 standard spaces on easterly side are restriped existing spaces and are not included;</i>													
<i>2 new accessible spaces replace 3 existing; service vehicle parking area is not included</i>													
<b>Public Parking Pavement Quantities (Square Feet, sf.)</b>													
Park Name	Ramirez*				Escondido	Latigo	Corral	Malibu Bluffs				Sub-Total	
Parking Area	1	2.1	2.2	2.3	-	-	-	1	2	3	4		
Paved Parking Area	4425	8,000	6350	6350	12750	5225	3600	5325	5200	5625	1615	64465	
<i>Dimensions (LxW, ft.)</i>	<i>95x60</i>	<i>168x50</i>	<i>135x50</i>	<i>135x50</i>	<i>150x85</i>	<i>110x45</i>	<i>90x40</i>	<i>81x61</i>	<i>81x61</i>	<i>86x61</i>	<i>52x45</i>	-	
Driveway Area	-	-	-	-	2400	-	1100	7185	7100	4075	-	21860	
<i>Dimensions (LxW, ft.)</i>					<i>150x16</i>		<i>40x40</i>	<i>300x20</i>	<i>400x20</i>	<i>110x47</i>		-	
Restroom	247	-	-	-	275	247	247	394.61	247	247	247	2151	
<i>Dimensions (LxW, ft.)</i>	<i>19x13</i>				<i>19.17x14.33</i>	<i>19x13</i>	<i>19x13</i>	<i>22x19</i>	<i>19x13</i>	<i>19x13</i>	<i>19x13</i>	-	
<b>Sub-Total per Area</b>	25372				15425	5472	4947	37261				88476	
<b>Total Paved Area</b>	<b>88476</b>				<b>sf.</b>								
Note: Values in red are approximate due to irregular geometry.													

<b>PROPOSED PROJECT</b>														
<b>Malibu Parks Public Access Restoration/ Enhancement Plans</b>														updated: 1/21/2010
<b>Campsite Quantities (Number of Sites)</b>														
Park Name	Ramirez		Escondido			Latigo	Corral		Malibu Bluffs					Sub-Total
Camp Area	1	2	1	2	3	1	1	2	1	2	3	4	5	
Small Type 1	-	3	-	2	3	4	9	5	3	6	-	12	3	50
Small Type 2	-	-	3	-	4	-	-	-	-	-	-	-	-	7
Large	2	-	-	-	1	1	2	-	-	-	4	-	-	10
Tent Cabin	-	-	-	-	-	-	-	-	4	-	-	-	-	4
<b>Sub-Total per Area</b>	5		13			5	16		32					71
<b>Total Number of Sites</b>	71													
<b>Miscellaneous Surface Areas (Square Feet, sf.)</b>														
Park Name	Ramirez		Escondido			Latigo	Corral		Malibu Bluffs					Sub-Total
Camp Area	1	2	1	2	3	1	1	2	1	2	3	4	5	
Host	-	-	160	-	-	160	975	-	600	600	600	-	-	3095
Dimensions (LxW, ft.)			20x8			20x8	65x15		50x12	50x12	50x12			
Water Tank	-	-	201	-	-	201	201	-	201	-	201	-	-	1005
Dimensions (Dia., ft.)			16			16	16		16		16			
Restroom	247	380	247	-	247	247	247	128	247	-	247	394.61	-	2631.605
Dimensions (LxW, ft.)	19x13	20x19	19x13		19x13	19x13	19x13	16x8	19x13		19x13	22x19		
Fire Shelter	96	96	200	-	-	96	1179	-	1683	-	504	-	-	3854
Dimensions (LxW, ft.)	12x8	12x8	25x8			12x8	45x15, 42x12		45x15, 42x12		42x12			
Tennis Court	5600	-	-	-	-	-	-	-	-	-	-	-	-	5600
Dimensions (LxW, ft.)	100x56													
<b>Sub-Total per Area</b>	6419		1055			704	2730		5278					16186
<b>Total Surfaced Area</b>	<b>16186</b>	<b>sf.</b>												

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<b>2002 LCP ALTERNATIVE</b>						
<b>Malibu Parks Public Access Restoration/ Enhancement Plans</b>					<i>updated: 1/18/2010</i>	
<b>Utility Trenching Estimate (linear feet, lf.)</b>						
<b>Park Name</b>	<b>Ramirez</b>	<b>Escondido</b>	<b>Latigo</b>	<b>Corral</b>	<b>Malibu Bluffs</b>	<b>Sub-Total</b>
Joint Trenching	-	70	-	240	245	555
Dry Utilities Only	-	133	-	30	90	253
Potable Water Only	-	520	-	1,900	1,680	4,100
Fire Water Only	-	-	-	-	20	20
Sanitary Sewer	-	-	-	-	-	0
<b>Sub-Total per Site</b>	<i>0</i>	<i>723</i>	<i>0</i>	<i>2,170</i>	<i>2,035</i>	<i>4,928</i>
<b>Total Trench Length</b>	<b>4,928</b>	<i>lf.</i>				

<b>2002 LCP ALTERNATIVE</b>														
Malibu Parks Public Access Restoration/ Enhancement Plans													updated: 1/18/2010	
Public Parking Space Quantities (Number of Proposed Spaces)														
Park Name	Ramirez*					Escondido	Latigo	Corral**	Malibu Bluffs				Sub-Total	
Parking Area	1	2.1	2.2	3.1	3.2	-	-	-	1	2	3	4		
Standard Angled	-	-	-	11	4	10	1	19	13	-	10	-	68	
Standard Parallel	-	4	3	-	-	1	-	-	-	-	-	-	8	
RV/ Trailer	-	-	-	-	-	3	-	-	-	-	-	-	3	
ADA Accessible	-	1	1	2	1	2	1	2	3	-	4	-	17	
<b>Sub-Total per Area</b>	27					16	2	21	30				96	
<b>Total No. of Spaces</b>	<b>96</b>					<i>(does not include existing, reserved, maintenance, fire equipment parking, etc.)</i>								
<i>* Area 2 lots are along Kanan Dume Rd. Area 3 lots are along Ramirez Canyon Park Access Road (Lauber Property)</i>														
<i>** 11 standard spaces on easterly side are restriped existing spaces and are not included;</i>														
<i>2 new accessible spaces replace 3 existing; service vehicle parking area is not included</i>														
Public Parking Pavement Quantities (Square Feet, sf.)														
Park Name	Ramirez*					Escondido	Latigo	Corral	Malibu Bluffs				Sub-Total	
Parking Area	1	2.1	2.2	3.1	3.2	-	-	-	1	2	3	4		
Paved Parking Area	(no new pavement)			3975	1245	12750	500	3600	5325	-	6980	-	34375	
<i>Dimensions (LxW, ft.)</i>				<i>63X56</i>	<i>60X20</i>	<i>150x85</i>	<i>26x19</i>	<i>90x40</i>	<i>81x61</i>		<i>95x65</i>		-	
Driveway Area	-	-	-	2500	41860	2400	-	1100	4120	-	2400	-	54380	
<i>Dimensions (LxW, ft.)</i>				<i>100x20</i>	<i>2093x20</i>	<i>150x16</i>		<i>40x40</i>	<i>200x20</i>		<i>78x24</i>		-	
Restroom	-	-	-	-	-	275	-	247	394.61	-	247	394.61	1558	
<i>Dimensions (LxW, ft.)</i>						<i>19.17x14.33</i>		<i>19x13</i>	<i>22x19</i>		<i>19x13</i>	<i>22x19</i>	-	
<b>Sub-Total per Area</b>	49580					15425	500	4947	19861				90313	
<b>Total Paved Area</b>	<b>90313</b>					<b>sf.</b>								
Note: Values in red are approximate due to irregular geometry.														

<b>2002 LCP ALTERNATIVE</b>											
<b>Malibu Parks Public Access Restoration/ Enhancement Plans</b>											updated: 1/21/2010
<b>Campsite Quantities (Number of Sites)</b>											
Park Name	Ramirez		Escondido		Latigo	Corral	Malibu Bluffs				Sub-Total
Camp Area	1	2	1	2	1	-	1	2	3	4	
Small Type 1	-	-	-	-	-	3	3	6	-	12	24
Small Type 2	1	-	3	1	-	-	-	-	-	-	5
Large	-	-	-	-	-	8	-	4	4	-	16
Tent Cabin	-	-	-	-	-	-	4	-	-	-	4
<b>Sub-Total per Area</b>	1		4		0	11	33				49
<b>Total Number of Sites</b>	49										
<b>Miscellaneous Surface Areas (Square Feet, sf.)</b>											
Park Name	Ramirez		Escondido		Latigo	Corral	Malibu Bluffs				Sub-Total
Camp Area	1	2	1	2	1	1	1	2	3	4	
Host	-	-	160	-	-	975	600	-	600	-	2335
<i>Dimensions (LxW, ft.)</i>			20x8			65x15	50x12		50x12		
Water Tank	-	-	201	-	-	-	201	-	201	-	603
<i>Dimensions (Dia., ft.)</i>			16				16		16		
Restroom	-	-	247	-	-	247	247	247	247	394.61	1629.605
<i>Dimensions (LxW, ft.)</i>			19x13			19x13	19x13	19x13	19x13	22x19	
Fire Shelter	96	96	200	-	-	1179	1683	-	504	-	3758
<i>Dimensions (LxW, ft.)</i>	12x8	12x8	25x8			45x15, 42x12	45x15, 42x12		42x12		
Tennis Court	(to remain)		-	-	-	-	-	-	-	-	0
<i>Dimensions (LxW, ft.)</i>											
<b>Sub-Total per Area</b>	192		808		0	2401	4925				8326
<b>Total Surfaced Area</b>	8326		sf.								

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<b>REDESIGN ALTERNATIVE</b>						
<b>Malibu Parks Public Access Restoration/ Enhancement Plans</b>					<i>updated: 1/18/2010</i>	
<b>Utility Trenching Estimate (linear feet, lf.)</b>						
<b>Park Name</b>	<b>Ramirez</b>	<b>Escondido</b>	<b>Latigo</b>	<b>Corral</b>	<b>Malibu Bluffs</b>	<b>Sub-Total</b>
Joint Trenching	255	70	160	2,100	245	2,830
Dry Utilities Only	-	200	-	30	90	320
Potable Water Only	155	490	315	1,275	1,680	3,915
Fire Water Only	-	-	20	20	20	60
Sanitary Sewer	530	-	-	-	-	530
<b>Sub-Total per Site</b>	<b>940</b>	<b>760</b>	<b>495</b>	<b>3,425</b>	<b>2,035</b>	<b>7,655</b>
<b>Total Trench Length</b>	<b>7,655</b>	<b>lf.</b>				

<b>REDESIGN ALTERNATIVE</b>													
Malibu Parks Public Access Restoration/ Enhancement Plans										updated: 1/18/2010			
Public Parking Space Quantities (Number of Proposed Spaces)													
Park Name	Ramirez*					Escondido	Latigo	Corral**	Malibu Bluffs				Sub-Total
Parking Area	1	2.1	2.2	3.1	3.2	-	-	-	1	2	3	4	
Standard Angled	8	-	-	11	4	10	1	19	13	-	10	-	76
Standard Parallel	-	4	3	-	-	1	-	-	-	-	-	-	8
RV/ Trailer	-	-	-	-	-	3	-	-	-	-	-	-	3
ADA Accessible	2	1	1	2	1	2	1	2	3	-	4	-	19
<b>Sub-Total per Area</b>	37					16	2	21	30				106
<b>Total No. of Spaces</b>	<b>106</b>					<i>(does not include existing, reserved, maintenance, fire equipment parking, etc.)</i>							
<i>* Area 2 lots are along Kanan Dume Rd. Area 3 lots are along Ramirez Canyon Park Access Road (Lauber Property)</i>													
<i>** 11 standard spaces on easterly side are restriped existing spaces and are not included;</i>													
<i>2 new accessible spaces replace 3 existing; service vehicle parking area is not included</i>													
Public Parking Pavement Quantities (Square Feet, sf.)													
Park Name	Ramirez*					Escondido	Latigo	Corral	Malibu Bluffs				Sub-Total
Parking Area	1	2.1	2.2	3.1	3.2	-	-	-	1	2	3	4	
Paved Parking Area	4425	-	-	3975	1245	12750	500	3600	5325	-	6980	-	38800
<i>Dimensions (LxW, ft.)</i>	<i>95x60</i>			<i>63X56</i>	<i>60X20</i>	<i>150x85</i>	<i>26x19</i>	<i>90x40</i>	<i>81x61</i>		<i>95x65</i>		-
Driveway Area	-	-	-	2500	41860	2400	-	1100	4120	-	2400	-	54380
<i>Dimensions (LxW, ft.)</i>				<i>100x20</i>	<i>2093x20</i>	<i>150x16</i>		<i>40x40</i>	<i>200x20</i>		<i>78x24</i>		-
Restroom	247	-	-	-	-	275	-	247	394.61	-	247	394.61	1805
<i>Dimensions (LxW, ft.)</i>	<i>19x13</i>					<i>19.17x14.33</i>		<i>19x13</i>	<i>22x19</i>		<i>19x13</i>	<i>22x19</i>	-
<b>Sub-Total per Area</b>	54252					15425	500	4947	19861				94985
<b>Total Paved Area</b>	<b>94985</b>					<i>sf.</i>							
Note: Values in red are approximate due to irregular geometry.													

<b>REDESIGN ALTERNATIVE</b>											
<b>Malibu Parks Public Access Restoration/ Enhancement Plans</b>											updated: 1/21/2010
<b>Campsite Quantities (Number of Sites)</b>											
Park Name	Ramirez		Escondido		Latigo	Corral	Malibu Bluffs				Sub-Total
Camp Area	1	2	1	2	1	-	1	2	3	4	
Small Type 1	-	-	-	-	2	3	3	6	-	12	26
Small Type 2	1	-	3	1	-	-	-	-	-	-	5
Large	2	-	-	-	1	8	-	4	4	-	19
Tent Cabin	-	-	-	-	-	-	4	-	-	-	4
<b>Sub-Total per Area</b>	3		4		3	11	33				54
<b>Total Number of Sites</b>	54										
<b>Miscellaneous Surface Areas (Square Feet, sf.)</b>											
Park Name	Ramirez		Escondido		Latigo	Corral	Malibu Bluffs				Sub-Total
Camp Area	1	2	1	2	1	1	1	2	3	4	
Host	-	-	160	-	-	975	600	-	600	-	2335
<i>Dimensions (LxW, ft.)</i>			20x8			65x15	50x12		50x12		
Water Tank	-	-	201	-	-	201	201	-	201	-	804
<i>Dimensions (Dia., ft.)</i>			16			16	16		16		
Restroom	247	380	247	-	247	247	247	247	247	394.61	2504
<i>Dimensions (LxW, ft.)</i>	19x13	20x19	19x13		19x13	19x13	19x13	19x13	19x13	22x19	
Fire Shelter	96	96	200	-	-	1179	1683	-	504	-	3758
<i>Dimensions (LxW, ft.)</i>	12x8	12x8	25x8			45x15, 42x12	45x15, 42x12		42x12		
Tennis Court	5600	-	-	-	-	-	-	-	-	-	5600
<i>Dimensions (LxW, ft.)</i>	100x56										
<b>Sub-Total per Area</b>	6419		808		247	2602	4925				15001
<b>Total Surfaced Area</b>	15001		sf.								

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**MALIBU PARKS PUBLIC ACCESS ENHANCEMENT PLAN OVERLAY  
ALTERNATIVES ANALYSIS**

For

**SANTA MONICA MOUNTAINS CONSERVANCY**

Los Angeles River Center & Gardens  
570 West Avenue Twenty-Six, Suite 100  
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(323) 221-8900

**And**

**MOUNTAINS RECREATION & CONSERVATION AUTHORITY**

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May 2009



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## 1. INTRODUCTION

Section 13666.4 of the Coastal Commission's Regulations requires that the Commission make certain findings in approving the Conservancy/MRCA LCP amendment "override." Section 13666.4(a) requires a finding that "development meet a public need of a geographic area greater than that included within the certified LCP." Section 13666.4(a)(3) also requires that the Commission find that "if significant adverse environmental impacts have been identified, reasonable alternatives have been examined, and mitigation measures have been included that substantially lessen any significant adverse environmental impact so that there is no feasible less environmentally damaging way to meet the public need. If development will have no significant adverse environmental impact, findings shall be included which support that conclusion."

Consistent with Section 13666.4(a)(3) of the Commission's Regulations, the following is a discussion of the public need for the public access and recreational resources addressed by the subject LCP amendment request, coupled with an assessment of reasonable and other recommended "alternatives" to the proposed LCP amendment that supports the finding that there is no feasible less environmentally damaging alternative that meets the public need.

The alternatives analysis provides responses, where determined appropriate and applicable, to the statements offered by the Ramirez Canyon Preservation Fund (RCPF) in their letter to the Commission of December 23, 2008, and a report prepared by SAIC (Analysis of Issues Relating to Application by the Santa Monica Mountains Conservancy for a Local Coastal Program Amendment Override, December 2008) referenced in the RCPF letter to support their arguments opposing the Conservancy/MRCA LCP amendment. For purposes of assisting the Commission with considering findings for Section 13666.4, the alternatives analysis also assumes that significant adverse environmental impacts could occur from future implementation of the public programs and improvements contemplated in the requested LCP amendment, although there is no evidence that suggests this would be the case, and therefore represents a reasonable worst-case analysis of potential alternatives and mitigation measures that could lessen any perceived potential impacts.

As opposed to the deficient presentation of "alternatives" provided by the RCPF and SAIC report, which identify NO alternative locations for the proposed parkland improvements within the City of Malibu and only one that is located in the Coastal Zone at the inland/coastal zone boundary, the alternative analysis below includes a good faith effort to identify reasonable alternatives that would meet, at least in part, the public need and thus the purpose and intent of the LCP amendment.

It must be noted that there is no specific development proposal being considered at this time. The Conservancy/MRCA LCP amendment merely requests that the Malibu Parks Public Access Enhancement Plan Overlay (Overlay) be incorporated into the Malibu

LCP to provide the policy framework to develop and implement future plans for public parkland improvements. As such, there is no need or requirement to provide for site-specific, quantitative analysis of potential impacts of any development proposal addressed in the Overlay. Rather, the analysis must consider if the proposed Overlay could result in new LCP policies or development standards that could create a previously unavailable opportunity and entitlement avenue for facilitating new development that could result in significant adverse environmental impacts. Should the Overlay be certified, future implementation of the parkland improvements included in the Overlay would require preparation of project-specific plans and design details, site-specific environmental data, and completion of environmental impact analysis as part of the applicable environmental review process.

It must be further noted that, although this alternatives analysis has been prepared to assist the LCP amendment process, there is absolutely no reasonable argument that the proposed Overlay, in and of itself, could result in significant adverse environmental impacts. This is true not only because there is no physical development that would cause a change in environmental conditions being requested or considered at this time, but also because the public improvements being considered in the Overlay are already allowed under the existing LCP. Trails, camping, public parking areas and other parkland support facilities (including park offices), and public gatherings/programs are primary permitted uses at the parklands included in the Overlay<sup>1</sup>. Permitted parkland uses under the current LCP are discussed in more detail in the following sections. While design details, specific improvement locations, mitigation measures, policy consistency analysis and conditions of approval would all be considered and evaluated for any future development proposal for the permitted parkland uses (as would be the case for future implementation of the Overlay improvements), the basic parkland use and facilities being considered here have the same potential to impact environmental resources as those uses and facilities presently allowed under the current LCP. The Overlay simply serves to supplement existing LCP policies and implementation measures to enhance and expedite potential future coastal public access and recreational facility improvements to and between specific Conservancy/MRCA-owned parklands in the City, and thus carry out the public access and recreation goals of the certified LCP and the Coastal Act.

In fact, the proposed Overlay would better ensure that parkland uses presently permitted by the Malibu LCP, if subject to the Overlay, would lessen the potential that significant adverse environmental impacts would result from future project implementation. This is because the Overlay contemplates parkland uses and facilities at specific parklands that have been extensively studied for purposes of preparing conceptual parkland improvement plans to gain a thorough understanding of the access and recreation demands, the resource and environmental issues possibly affecting public use of the parks. For this reason, the Overlay includes a set of site-specific

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<sup>1</sup> The basis for the conclusion regarding currently allowed parkland uses and facilities under the current LCP is discussed and presented in more detail in documentation included in the Conservancy/MRCA LCP amendment submittal Policy Consistency Analysis.

policies for specific improvements that go way beyond the certified LCP in requiring and directing location and design detail, use limitations and outright restrictions to ensure that, even at the policy level, issues of potential environmental impacts are addressed and mitigated within the policy framework of the Overlay. As such, in the case of the proposed Overlay, disapproval of the Conservancy/MRCA proposed LCP amendment (the “No Action” Alternative), would potentially result in greater environmental impacts than would occur if the proposed Overlay is certified.

Nevertheless, the Conservancy/MRCA offer the following alternatives analysis in response to comments received on the proposed LCP amendment to provide additional information to support the Commission’s findings required pursuant to Section 13666.4 of the Coastal Commission’s Regulations, working under the assumption that it can be found that potentially significant adverse environmental impacts have been identified. The potential environmental impact issues considered herein would only be pertinent if and when the Conservancy/MRCA bring forward a specific development proposal, at which point potential adverse environmental impacts would be analyzed pursuant to the applicable environmental review process.

## **2. PUBLIC NEED FOR RECREATIONAL RESOURCES THAT EXTENDS TO AN AREA GREATER THAN THAT COVERED BY MALIBU’S LCP**

Many of the comments received in opposition to the Conservancy/MRCA proposed LCP amendment lack a general understanding of the collective mission of the Conservancy and MRCA, which strive to preserve, protect, restore, and enhance lands of Southern California, and to create an interconnected system of parks, open space, trails, and wildlife habitats that are easily accessible to the general public. The mission is applicable to all Conservancy/MRCA-owned parklands and, just as the Legislature recognizes that “the California coastal zone is a distinct and valuable natural resource of vital and enduring interest to all the people and exists as a delicately balanced ecosystem” (Coastal Act Section 30001), so do the Conservancy/MRCA recognize the need to preserve, protect, restore, and enhance their coastal parklands for the benefit of coastal resources and in the interest of all people.

Section 33001 of the Santa Monica Mountains Conservancy Act (Division 23, Public Resources Code) provides.

The Legislature hereby finds and declares that the Santa Monica Mountains Zone, as defined in Section 33105, is a unique and valuable economic, environmental, agricultural, scientific, educational, and recreational resource that should be held in trust for present and future generations; that, as the last large undeveloped area contiguous to the shoreline within the greater Los Angeles metropolitan region, comprised of Los Angeles and Ventura Counties, it provides essential relief from the urban environment; that it exists as a single ecosystem in which changes that affect one part may also affect all other parts; and that the

preservation and protection of this resource is in the public interest. [Emphasis added.]

The proposed LCP amendment submittal is clear: the Conservancy/MRCA seek to provide public access and recreation opportunities at their coastal parklands for an area much broader than just the City of Malibu, including the entire Los Angeles region and those that may come to enjoy the California coast from far greater distances. The need and demand for public recreation at Conservancy/MRCA parklands can not be focused nor determined by the residents of Malibu alone, but the roughly 17 million people that live and work within the Los Angeles area and visitors seeking coastal recreation throughout California and the Nation. As such, the demand for public recreation at coastal parklands must take into account the lack of existing facilities within the Santa Monica Mountains and Malibu region, and the history of conflict surrounding attempts to improve park facilities within Malibu for visitors, when determining appropriate future uses within the Conservancy/MRCA parklands.

The proposed LCP amendment is intended to address issues associated with growing visitation and demands for outdoor recreational opportunities in the Coastal Zone of the Santa Monica Mountains and Malibu area. Unfortunately, the City of Malibu has a long history of conflict related to meeting the Coastal Act mandate of protecting and enhancing public access and recreational resources. In recognition of this ongoing conflict, the Commission certified the City's LCP which describes the various factors that have historically limited public access opportunities in the Malibu region:

*“Public access to and along the shoreline and trails, and the provision of public recreational opportunities and visitor-serving facilities such as campgrounds, hotels and motels has historically been a critical and controversial issue in Malibu. Continuing conflicts in providing maximum public access to and along the shoreline and trails, as mandated by the Coastal Act, is evidenced in the Coastal Commission's permit regulatory reviews and public hearings concerning proposed projects in Malibu since 1976.”* (Chapter 2 of the City of Malibu Local Coastal Program Land Use Plan). [Emphasis added]

The demand for coastal public access and recreation opportunities, the mandates of the Malibu LCP and of the Coastal Act to meet this demand, and the continuing conflict with the City of Malibu remains today as evidenced by the history and circumstances resulting in the Conservancy/MRCA LCP amendment override application. The override procedure invoked for the proposed Overlay allows for such amendments because, as with the Conservancy and MRCA, it is the Coastal Commission's role to apply a regional or statewide perspective to land use debates where the use in question is of greater than local significance. Where local governments generally are constrained to plan the use of land only within their jurisdictional boundaries, the Commission was created, in part, in order to take a broader view in making land use decisions for California's coastal properties in the interest of all people.

## 2.1. Need for Public Access and Recreation Trail Resources

There is no doubt that population growth and decades of private development in the coastal area of Malibu have and will continue to result in substantial loss of public access and recreational opportunities. Previously open lands, beaches, and historic trails have become developed and, as population has continued to grow in the region, more people seek use of the dwindling supply of such resources. In addition, many necessary support facilities for recreation have been affected as available public transit, parking, restrooms, and other amenities become overburdened and/or are difficult to accommodate given the shrinking supply of land available to provide for such facilities.

It is important to note that the public shoreline access and recreation policies of the Coastal Act and Malibu LCP are not separate and distinct, but are interrelated and often necessarily dependent policies. These are implemented together to meet an ever-increasing demand for public access and recreation opportunities throughout upland and shoreline areas of the coastal zone. This is reflected in the certified Malibu LUP, which addresses coastal access in terms of physical supply including *“lateral access (access along a beach), vertical access (access from an upland street, parking area, bluff or public park to the beach), coastal blufftop trails, and upland trails that lead to the shore or traverse inland parklands within the coastal zone”*.

In response to widespread public demand and support for recreation opportunities, several agencies have spent decades planning for an expansive trail system for the Malibu coastal zone and larger Santa Monica Mountains National Recreation Area, major components of which cross and potentially connect the parklands addressed in the Overlay. This trail system includes the Backbone Trail, a primary trail corridor traversing a variety of public parklands along the coast north of the City from urban areas of Los Angeles County to the east, past Topanga State Park and on to Point Mugu State Park in Ventura County to the west. Various inland connector trails link urban areas (such as Santa Monica, the San Fernando Valley and Simi Valley) with the trail corridors and parklands of the Santa Monica Mountains National Recreation Area from which one could ultimately gain access to the shoreline. Implementation of the proposed Overlay trail system and support facility improvements is critical to completing and supporting access to the Coastal Slope Trail within the City of Malibu, and its ultimate connection to the Backbone Trail that will provide access to and between adjacent urban areas of Los Angeles County and Ventura County, the larger Santa Monica Mountains National Recreation Area, and the shoreline within the City of Malibu.

In an effort to keep up with existing and increasing demand for recreational resources in Malibu and the Santa Monica Mountains coastal area, and consistent with the access and recreation policies of the Coastal Act, the Coastal Commission has for decades implemented the Coastal Access Program Offer to Dedicate (OTD) program in the area. The Overlay’s trail improvement program addresses existing and planned alignments of various trails through the Overlay area based on trail planning data gathered from the National Park Service (NPS), the City of Malibu LCP and the City’s Trail Master Plan. Segments of these trails currently exist, but large portions are incomplete and a number

of trail OTDs intended to accommodate the trails remain unimproved. There are a number of opportunities to improve the recorded trail OTDs and thereby fill a number of “missing links” in the trail system and thereby increase and expedite creation of the recreation resources intended.

### **2.2. Need for Coastal Camping**

The SAIC report’s initial assumptions and conclusions regarding the public need for the recreation improvements included in the Overlay are fundamentally flawed. SAIC states that because the Conservancy/MRCA’s proposed conceptual plans for coastal camping do not include direct beach or shore access, the list of campgrounds and beaches included in the LCP amendment submittal’s Public Access and Recreation – Current Demand and Proposed Overlay Goals document does not support a rationale for the additional coastal camping opportunities contemplated in the Overlay.

The RCPF and SAIC overlook important points conveyed very clearly in the LCP amendment submittal. First, Corral Canyon Park does indeed have direct access to the shoreline at Dan Blocker Beach. While it is true that Ramirez Canyon Park and Escondido Canyon Park do not presently have direct access to the shoreline, the Conservancy/MRCA programs and improvements included in the Overlay would facilitate implementation of the regionally important Coastal Slope Trail which, when completed, would link all of the proposed camping areas via access along a specific trail system, decades in the making, that would achieve access from the Conservancy/MRCA parklands to the shoreline via Corral Canyon Park. In addition to the heavily influenced coastal climate that would provide a unique visitor-serving experience in the Malibu, the proximity of the parkland camping areas to the shoreline, planned in conjunction with the comprehensive trail improvement program, would enhance public access opportunities to public parklands and the shoreline, a basic objective and key element of the proposed LCP amendment that simply cannot be achieved with improvements to “alternative” inland park areas suggested by the SAIC report as alternative locations. Beyond shoreline access, Section 30223 of the Coastal Act, which provides the Coastal Act policy support for the Commission’s inland trail program that would be implemented by the proposed LCP amendment, further underscores that “Upland areas necessary to support coastal recreational uses shall be reserved for such uses, where feasible.” (See also Letter from Laurie C. Collins, Conservancy Chief Staff Counsel to CCC, dated May 14, 2009, pp. 27-28.)

The SAIC report goes on to recognize that most popular campgrounds in California are at or near capacity during peak times, but argues that the LCP amendment submittal is unclear with respect to why new low-cost camping facilities are contemplated in the City of Malibu. To the contrary, as explained below, the unmet public demand for camping resources along the coast and high/exceeding use capacity statistics (particularly for coastal campgrounds) are well documented, and State Parks reports it is unable to keep up with the growing demand for camping. It is for those reasons, that the Conservancy/MRCA are proposing camping opportunities in Malibu.

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California State Parks data relative to existing demand for public camping facilities in areas in the same region of Malibu demonstrate a significant unmet demand for camping opportunities. In 2007, State Parks personnel reported that the months of June, July and August experienced a 107.4% capacity for camping at the Leo Carrillo, Malibu Creek, Point Mugu and Thornehill Broome campgrounds located in County jurisdictions (the extra 7.4% attributed to overflow camping and group camping; State Parks email, November 2, 2007).

In addition, a State Parks News Release (November 2007) confirmed an overwhelming, unmet demand for camping resources on a State-wide level, particularly along the California Coast, reporting that camping reservations on opening day for May increased 20% from 2006 with many coastal camping facilities, Bolsa Chica in Orange County, Carpinteria State Beach in Santa Barbara County, Doheny State Beach in Orange County, San Clemente State Beach in Orange County, San Elijo State Beach in San Diego County, and South Carlsbad State Beach in San Diego County, at 90% capacity by close of business on opening day. Personnel of the Long Range Planning Program for California State Parks further reports the following on public demand and support for developing new camp areas along the California Coast:

*The California State Parks system has not stayed abreast with the demand for peak-season camping as the population has grown. There is a high unmet demand for camping outdoor opportunities in California. Changes in California's demography, coupled with growing tourism, have created unprecedented demand for more camping opportunities. The demand for all campsites at State Parks grew by approximately 13% between the years 2000 and 2005.*

*California's state parks are the most heavily visited of any state park system in the nation. Some facilities are at capacity. Coastal beaches and campgrounds, for example are the most heavily used state parks. State Parks coastal campsites are at or near capacity during the spring, summer and fall months, with thousands of potential visitors turned away. Demand is so high that if the Department were to add 325 camp sites a year, it would not keep up with requests. (The State Park System Plan 2002, Part I: A System for the Future, [www.parks.ca.gov/?page\\_id=24512](http://www.parks.ca.gov/?page_id=24512)).*

With all this unmet demand for camping, particularly for coastal camping, there are presently no low-cost public camping opportunities in Malibu. One (1) private campground facility, the Malibu RV Park, exists in the City and is located east of the intersection of Corral Canyon Road and Pacific Coast Highway. The Malibu RV Park includes 35 tent spaces for which fees range between \$41-\$46 Sunday-Thursday and \$51-\$56 Friday-Saturday during the peak season (May 23-September 30), and between \$20-\$25 Sunday-Thursday and \$25-\$30 Friday-Saturday during the off season (October 1-May 22). A holiday surcharge of \$20/night per tent is imposed, except on the 4<sup>th</sup> of July when a surcharge of \$75/night per tent is required. The limited supply of overnight camping facilities in Malibu, and the apparent ability to charge considerable fees for use of the limited facilities that are available, indicate a significant demand for these limited resources.

As it questions the rationale for seeking to provide additional camping resources, particularly in Malibu, the SAIC document sites that there are nearly 1,000 group and family camp sites within approximately one hour of Malibu. The statement is misleading since many of the areas cited are not open year round, but are seasonal and are much more than an hour away from this part of the coast. In addition, the analysis does not discuss how the so called 1,000 campsites meet current demand for outdoor recreation camping, especially the demand for coastal camping, but only provides a list of campgrounds within 200 miles of the Malibu area.

The Conservancy and MRCA believe that providing new low-cost camping opportunities is a critical component to meeting an unmet demand for public access and recreation opportunities in the Coastal Zone as current trends in the market place and along the coast provide a clear challenge to developing and maintaining lower-cost overnight accommodations that are in high demand to serve various types of visitors. For this reason, one of the primary components of the Overlay is the specific provision of low-cost overnight camping in the Malibu coastal area.

Currently, there are very few, if any, camp facilities in the Santa Monica Mountains designed with the specific objective of accommodating individuals with disabilities. As such, the Overlay District provides for fully accessible camps facilities in each park area considered for campsite development. In addition, the Overlay District will establish the Malibu Parks Affordable Access Fund, supported by net proceeds of special event uses at Ramirez Canyon Park, to fund the Malibu Coastal Camping Program. It is anticipated that each special event at Ramirez Canyon Park would yield approximately \$1,000 of net proceeds, and could therefore fund approximately 20 participants in one overnight program event. The camping experience funded by the Malibu Parks Affordable Access Fund is designed to provide urban, disadvantaged youth with their first overnight camping experience.

Camping at Corral Canyon Park and Escondido Canyon Park would provide unique visitor-serving experiences in the Malibu area by providing smaller campsites close to both coastal canyon habitat and the beach, and with little development disturbance or activities. The only other existing camp areas in Malibu and other nearby areas of the Santa Monica Mountains are larger campgrounds that inherently generate more disturbance from foot traffic and vehicles (e.g., noise and light associated with vehicles coming and going, noise associated with car doors shutting, etc.). As opposed to “car camping” in larger campsites in the region, the campsites proposed at Corral Canyon Park and Escondido Canyon Park would be smaller and easily accessible by a short walk. The camp areas would be removed from the noise, foot traffic, and presence of cars and asphalt and thus the serenity and solitude of nature could be experienced, similar to a “backpacking” experience, but with only a short hike from primary park access points. The proposed Corral Canyon and Escondido Canyon campsites would provide an opportunity to experience wilderness and natural habitat more readily than backpacking, and at a smaller scale compared with all other area campgrounds. The lack of distractions would make for a unique natural experience, yet the minimal scale of

the proposed camp areas would be less likely to disturb local wildlife. It is expected that proposed camp areas in Corral Canyon Park and Escondido Canyon Park would be relatively quiet in all respects and more likely to remain so during the course of the night. In addition, as campfires are prohibited, the associated distractions (e.g., smoke, burned out coals, etc.) would be avoided. Visitors travelling up and down the coast could experience an amazing opportunity to camp, hike, enjoy nature, and visit the beach. In addition, at Corral Canyon Park, visitors would have easy access to local eateries. By allowing campers at Corral Canyon Park and Escondido Canyon Park to reserve campsites onsite, there would be visitor-serving flexibility to take advantage of a high-quality, low-cost and unique camping experience.

Ramirez Canyon Park would also provide visitors a unique camping experience, unlike other camping opportunities in the area. Campsites at Ramirez Canyon Park would also be small and accessible by a short walk, with fewer disturbances that are found at larger, car camping sites. The Ramirez Canyon Park campsites would also be close to coastal canyon habitat and the beach. Campers at Ramirez Canyon Park could enjoy observing the beautiful landscaping/gardens and architecture of this developed compound, as well as the surrounding native vegetation, adjacent creek, and local wildlife. The existing amenities at the park (e.g., picnic areas, sitting benches, riparian area interpretative trail) would contribute to this unique camping experience.

### **2.3. Need for Recreation Facilitates for Visitors with Disabilities**

The RCPF and SAIC correspondence includes several comments regarding the accessible features of the proposed Overlay, but it appears the authors must not have had the benefit of the various submittal materials addressing these features. The proposed Overlay provides for expansion of recreational opportunities at existing park facilities to serve a variety of visitors, whenever feasible and consistent with safety needs and constraints of natural parklands. The Overlay provides that proposed park improvements enhance accessibility, wherever feasible and consistent with public safety and resource protection policies, thus park improvements have been conceptually designed for location, size and program implementation consistent with the recommended guidelines for the universal design of trails and trail facilities as described in a study prepared specifically for the parklands included in the Overlay (Moore, Iacofano, Goltsman, Inc. Study, 2006).

The parklands addressed in the proposed Overlay vary substantially with respect to existing access, recreation support facilities, and amenities and thus the access opportunities and type of public park use also vary greatly between individual park areas. The Overlay is intended to provide for expansion of recreational opportunities at park facilities to serve a variety of visitors, whenever feasible and consistent with the constraints of natural parklands. The Conservancy and MRCA recognize that, in some cases, natural constraints of parklands inherently limit access and recreation opportunities for visitors of varying abilities (e.g., physically and mentally challenged). As such, the Conservancy and MRCA have identified an underserved population seeking coastal access and recreation and have therefore emphasized the need to

provide facilities and outreach programs intended to accommodate this population.

In making public parkland facilities maximally accessible, the Conservancy and MRCA have developed the Overlay with specific provisions for accessibility while remaining sensitive to circumstances in which conventional accessibility modifications may adversely affect the natural character of park areas. In these situations, the Overlay proposes to incorporate the recommended guidelines for the universal design of trails and trail facilities as described in the document prepared by Moore, Iacofano, Goltsman, Inc. (MIG), dated June 2006, into all plans for parkland facilities, where feasible. These guidelines provide design specifications and alternative regulations to facilitate access and use by persons with disabilities to structures and natural park properties.

Ramirez Canyon Park contains a number of established amenities to support public use programs designed to facilitate accessibility including picnic areas, restrooms, educational displays, sitting benches, gardens, easily accessible terrain, and a riparian area interpretive trail. As such, the Overlay does not contemplate extensive physical improvements for Ramirez Canyon Park to improve accessibility but includes detailed program and operational policies and implementation measures to ensure that public outreach programs are implemented to the maximum extent feasible.

### **2.4. Need for Recreation Support Facilities**

The public access and recreation demand of the region can only be met where adequate facilities exist to support recreation. For the Conservancy/MRCA parklands in region, this is best accomplished by linking and integrating natural parks via trail linkages, public transportation, and/or thematically via public programs and events, and providing adequate support facilities to make certain residents, visitors and recreationists can reach and enjoy these public resources. Given the diversity of parklands included in the Overlay area, and the unique and varying degree of available amenities and opportunities to develop new amenities at the parklands, the Overlay similarly has the opportunity to provide for a varying degree of public access and recreation opportunities unique to each park property. These policies may be further implemented by developing necessary park support facilities within park boundaries to ensure access and recreation goals are achieved by providing facilities for parking, visitor restrooms, park staff housing, and facilities to support program operations and park maintenance, as appropriate.

The physical supply of public access and recreational resources (trails, parklands, camping facilities, etc.) is a primary factor in securing access and recreational opportunities. However, a number of other elements affecting access and recreational opportunities include 1) the availability of public transit, 2) parking availability, 3) provisions for support facilities such as restrooms and picnic areas, 4) addressing user demands and conflicts, and 5) the availability of personnel facilities necessary to support daily operations, maintenance needs for parklands, and public programs intended to provide a diversity of coastal access and recreation opportunities. The Malibu LCP provides numerous policies that apply specifically to trail development for

public access and recreation purposes, which must be supported by provision of adequate support facilities such as parking, trash receptacles, restrooms, picnic areas, etc.

Existing and proposed support facilities provided for in the proposed Overlay are those facilities deemed necessary to support the primary permitted land use, in this case public access and recreation, research and education, and nature observation. The type of support facilities addressed at each park facility is based on the level and complexity of public uses and specialized programs offered at each park area. Ramirez Canyon Park, given its unique character, relatively built-out condition (used previously as an estate compound), limited accessibility to the public, and specialized programs requires more administrative and support facilities to maintain access programs, daily operations and maintenance than do Escondido and Corral Canyon Parks that provide primarily passive recreation. The Park contains a number of existing support facilities and amenities including picnic areas, restrooms, educational displays, sitting benches, gardens, easily accessible terrain, and a riparian area interpretive trail, all of which are readily available for specialized public use programs. Although public access into the park is currently limited per the request of local neighbors along Ramirez Canyon Road, the existing facilities at Ramirez Canyon Park provide a unique park environment with well established support facilities necessary to operate specialized public outreach programs for individuals with varying degrees of abilities (e.g., physically and mentally challenged). Additionally, the developed nature of Ramirez Canyon Park provides facilities from which the Conservancy and MRCA operate and monitor public outreach and educational programs for the park while conducting administrative, maintenance, and critical planning programs for park and recreational lands in the coastal area.

### **3. PURPOSE AND INTENT OF THE LCP AMENDMENT**

The purpose of the Malibu Parks Public Access Enhancement Plan Overlay is to maximize and prioritize public access and recreational opportunities in specific parkland and recreation areas in Malibu, consistent with sound resource conservation principles and constitutionally protected rights of private property owners. The Plan Overlay further intends to supplement and implement the public access and recreation policies of Chapter 3 of the Coastal Act, Chapter 2 of the Malibu Local Coastal Program Land Use Plan, and Chapter 12 the Malibu Local Coastal Program Local Implementation Plan. To implement the goals, objectives, and policies of the public access and recreation policies of Chapter 3 of the Coastal Act, and Chapter 2 of the Malibu Local Coastal Program Land Use Plan, the Overlay provides site specific development standards and other implementation measures to 1) complete trail connections for the Coastal Slope Trail, between the beach and the Backbone Trail, and other connector trails and to ensure adjacent lands are protected as natural and scenic areas to enhance the recreational experience of trail corridors, and 2) identify site specific public access, recreational facility, and program improvements for Ramirez Canyon Park, Escondido Canyon Park, and Corral Canyon Park to provide camp areas, critical support facilities,

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improved public transit, and improved trail and park accessibility to facilitate an increased level of accessibility for visitors with disabilities.

In addition, consistent with Coastal Act Section 30210, to provide recreational opportunities for all people, the Overlay includes detailed policies and implementation measures for Ramirez Canyon Park program and operational elements that support special public outreach and educational opportunities, as well as the administrative infrastructure necessary to operate specialized public outreach programs and to ensure that maximum public access and recreational opportunities are provided for visitors with varying degrees of special needs.

The Malibu Parks Public Access Enhancement Plan Overlay has been developed to meet the following public access and recreation objectives:

- Plan, design and develop trail connections throughout the Plan area and new overnight camping opportunities, and ensure that sufficient support facilities are provided, to readily serve the existing and growing demand for public access and recreation in the Santa Monica Mountains and Malibu coastal area, and to increase accessibility to parklands for all people.
- Secure trail easements and land purchases where necessary and feasible to connect Conservancy/MRCA-owned coastal parks and link with regionally significant Coastal Slope Trail in both the City of Malibu and unincorporated County of Los Angeles and across federal park property (Solstice Canyon, owned by the NPS).
- Implement years of Coastal Commission-required OTDs in the City of Malibu and unincorporated County of Los Angeles to achieve the Commission's long-standing goal to link inland trail dedications and make them accessible to the public, and to link inland trails with shoreline access opportunities.
- Provide for a continuous inland public access trail system that provides unique and spectacular views of the coast and ocean and, wherever feasible, linkages to access the shoreline.
- To provide for a "Beach to Backbone Trail," using the Coastal Slope Trail as a trail connector.
- To provide public access to and promote use of coastal parks and trails by visitors outside of the City of Malibu, consistent with Coastal Act section 30223: "Upland areas necessary to support coastal recreational uses shall be reserved for such uses, where feasible."
- Provide low-impact and low-cost camping and trail facilities for all persons in the coastal zone, and specifically the Malibu coastal zone.
- To provide for public access and recreation uses and support facilities approved by the Coastal Commission (No. 4-98-334) at Ramirez Canyon Park.
- To facilitate the California Coastal Trail vision to *"Create linkages to other trail systems and to units of the State Park system, and use the Coastal Trail system to increase accessibility to coastal resources from urban population centers."* (Completing the California Coastal Trail, Coastal Conservancy 2003.)

- To encourage non-vehicular circulation between park areas over vehicular use and emphasize pedestrian circulation between park areas and the shoreline as a primary form of circulation.

#### 4. LCP AMENDMENT ALTERNATIVES

##### 4.1. Alternative Site Locations for the Public Improvements Contemplated in the Conservancy/MRCA Proposed Overlay (*Offsite Project Alternative*)

A number of alternative site locations for the public improvements addressed in the Overlay have been suggested by the RCPF relying heavily on a report prepared by SAIC (December 2008), which includes a “high-level alternatives analysis”. The SAIC report appears to have been prepared with a single intent: To find potential alternative locations for Conservancy/MRCA’s proposed conceptual improvements anywhere, except within the City of Malibu, and especially not at Ramirez Canyon Park.

At the outset, it must be noted that none of the alternative site locations considered in the SAIC analysis are within the City of Malibu or even immediately adjacent to the City. None of the alternative site locations involve the coastal resources at issue in the Malibu coastal zone, and only one of the alternative sites considered, King Gillette Ranch, is partially located in the Coastal Zone. While located, at least in part, in the Coastal Zone, King Gillette Ranch is located beyond the first major ridgeline paralleling sea, at the inland edge of the Coastal Zone boundary, and involves a completely different microclimate and associated resources than do the parklands addressed in the Overlay, and, in any event, fails to fulfill most of the basic public need and objectives identified and addressed by the LCP amendment. By staying out of the City of Malibu, all of the RCPF/ SAIC “alternatives” deprive the coastal trail user and camper of “blue water” views that are so prized along the coastline, and indeed which constitute a major aesthetic purpose for the Conservancy/MRCA proposal.

None of the alternatives offered by the RCPF or SAIC report capture the purpose and objectives of this project, which is unique by virtue of the nature and status of the trail linkages and camping opportunities proposed. The Overlay would provide for implementation of the Coastal Commission’s inland trail program and OTDs, and is consistent with 30223, regarding reservation of upland areas for recreational uses. The Overlay trail improvement program would string together five Conservancy/MRCA and National Park Service parks, and provide consistent trail and camping facilities for recreationist, including disable persons. Since alternatives must be able to implement at least most project objectives, the alternatives suggested by the RCPF and SAIC do not qualify in this regard, and therefore would not be appropriate or feasible. Most of the alternatives suggested are entirely outside of the coastal zone, and with the exception King Gillette Ranch, are not owned by the Conservancy/MRCA and therefore are likely infeasible; no information is provided regarding the costs or other constraints on acquisition of these alternative sites or the chance for timely and successful completion of the public improvements addressed in the Overlay.

#### 4.1.1. Camping

##### Alternative Camping Locations Identified by the RCPF/SAIC Analysis (December 2008)

The SAIC report discussion regarding camping is more appropriate for an existing setting discussion than an analysis of camping demand for people residing within the Los Angeles region and throughout the State. The document fails to demonstrate whether camping demand is being met by existing supply, and includes no discussion specifically about coastal camping resources, and only states that there are campgrounds in the area, many of which are a 1-2 hours drive from the Los Angeles Region and the coast. The proposed LCP amendment camping program anticipates development of camp areas that are accessible by transit to benefit recreationist in the Los Angeles region who don't have the means to drive 1-2 hours for camping opportunities. Furthermore, the document misrepresents the proximity of many of the highlighted campgrounds in the area, stating that they are within 40 miles of Malibu. This may be true as a crow flies, however, it is most likely that the campgrounds cited are accessed by vehicle making the campgrounds 60 or more miles away from the area. For example, the Frazier Park campgrounds are over 90 miles away, the La Panza camp area is over 200 miles away, the Wheeler Gorge camp area is over 60 miles away as is the Castaic Lake Recreation Area.

The SAIC document attempts to convince the reader that there are several campgrounds in the "project area" that provide at least some accessible camp sites. The document states that a full inventory of accessible parks and outdoor recreation facilities in the "project area" is beyond the scope of the analysis, but the document provides a list of State Parks that have an accessible picnic area, trail, beach/shore, or an exhibit/program, but not overnight camping. Many of the sites listed are over 80 miles away (e.g., Hungry Valley, Antelope Valley). This section is more revealing to the general lack of accessible parkland areas in the area and region, a public need the LCP amendment tends to address.

Of the 92 parcels evaluated for potential overnight camping opportunities, the SAIC report ultimately suggests only four parcels, in particular, that have potential for construction of overnight campgrounds, including accessible facilities, and the report recognizes that a more thorough evaluation is needed to determine actual suitability of the identified sites. All four alternatives, however, are located outside the Coastal Zone, and therefore would provide no public access or public recreation for coastal users, and would not meet the most basic project objectives or public need addressed by the LCP amendment. In particular, none of SAIC's proposed alternatives would provide access to any area or trail that provides for the unique and spectacular views of the ocean and California coastline, and obviously none could be connected to the shoreline with upland trails. The use of the four alternative sites suggested, including King Gillette Ranch, would essentially negate the Coastal Commission's efforts in requiring inland coastal trails that could support the Coastal Slope Trail for which OTDs have been secured over decades. The first three parcels would provide the sound of the freeway

in the background, as opposed to the ocean. The fourth parcel is located on the San Fernando Valley side of Calabasas, north of Mulholland Highway far removed from the coast.

King Gillette Ranch, while it certainly provides much opportunity for passive recreation, also supports a very active program for recreational and educational uses given the developed ranch that exists there. The higher level of use at King Gillette Ranch could hardly provide unique visitor-serving experiences as envisioned by the Overlay where smaller campsites close to both coastal canyon habitat and the beach, and with limited relative ongoing disturbance would be accommodate in a more tranquil and natural setting. The camping opportunities at the parklands addressed in the Overlay are unique as potential camp areas have been identified in existing disturbed areas to avoid impacts to environmentally sensitive habitat area (ESHA), yet would be located in areas surrounded by significant habitat areas, and the camp areas would be connected by a trail system with magnificent ocean views and which provides direct access to the shoreline. Its possible that a tranquil camping experience could be provided at King Gillette Ranch but certainly not within or adjacent to the existing developed or disturbed areas that presently support active recreation and park program uses at the Ranch, thus otherwise necessitating development in ESHA to provide a similar camping experience as that proposed for the Overlay parklands, and there is no opportunity at the Ranch to provide an experience that would be comparable to the visual and coastal access experience as that provided by the Overlay.

After evaluating 92 parcels, SAIC cites only four parcels that have a potential for trail camps, and again admits that a more thorough evaluation is needed to determine actual suitability of the sites evaluated to accommodate trail camps. The first site suggested is in Simi Valley, miles from the coastal zone, and all suggested locations are well inland, miles from the coastline. Two of the sites potential sites identified for trails camps are also identified as potential overnight camping sites which, as discussed above, are much more intense than the low-impact camp program proposed for the Overlay. The brief descriptions of these alternative sites indicate that these sites also contain sensitive habitat areas and 3 out of 4 are without water for most, if not all, of the year. Comments applicable to overnight camping as discussed above are essentially applicable to the SAIC discussion of trail camps in that the suggested alternative sites have no opportunity to provide an experience that would be comparable to the visual and coastal access experience as that provided by the Overlay.

The camping program included in the Overlay is proposed to be low-impact, low-cost walk-in camping, and it is not designed for car camping which would detract from the tranquil, minimal disturbance visitor experience sought for the program. In addition, the Conservancy/MRCA camping program included in the Overlay is designed to be transit accessible, so that visitors can utilize the MTA bus service and backpack to the camp areas in Corral Canyon Park and beyond to Escondido Canyon Park and Ramirez Canyon Park via the Coastal Slope Trail. There is readily available bus service available for transit from inner city Los Angeles and other areas outside of Malibu to

Corral Canyon Park, a transportation resource that is not found at a facility like King Gillette Ranch.

### Alternative Camping Locations Potentially Meeting LCP Amendment Objectives

1. Charmlee Park is a City of Malibu-owned coastal parkland with many of the same qualities as the parklands included in the Overlay. However, Charmlee Park is obviously not a feasible alternative location because, although suggested by the City of Malibu and initially, with agreement of the Conservancy/MRCA, it was included in the LCP amendment request made to the City as an alternative to campsites at Escondido Canyon Park, the City ultimately withdrew it from consideration and refused to permit the uses proposed in the Park.

2. Malibu Bluffs Park – The Park has been the subject of discussions, and disagreement, relative to recreation land use in the past. In 1985, the Coastal Commission denied a permit amendment request (Coastal Development Permit 5-82-780A) to develop active and passive recreation uses of the property, finding that the proposed uses were insufficient to serve the growing demand of visitors from the region and elsewhere in California for recreation, namely, recreational uses such as camping, hiking, walking for pleasure and picnicking. In 2005, the California Department of Parks and Recreation conveyed approximately 84 acres of the unit to the Conservancy. The developed portion of the property (approximately 11 acres of municipal sports complex, including the Malibu Little League ball fields, and community center) was conveyed to the City of Malibu in 2006, while the Conservancy retained the 84 acres of native natural habitat overlooking the ocean which is managed by the MRCA. This property is suitable for low-impact, low-cost camping facilities, but its location immediately adjacent to the Little League ball fields and just above and north of a residential neighborhood below the bluffs would likely trigger the same public opposition to camping that has been seen with respect to even more remote sites. In addition, the location of Malibu Bluffs parallel to Pacific Coast Highway (PCH) is better suited to RV and car camping, which is also essential to provide within the Malibu Coastal Zone and the Conservancy/MRCA remain committed to exploring this option as well. However, the RV/car camping option does not meet the objectives of the tranquil, minimal disturbance visitor experience sought for the camping program in the LCP Amendment Override, and Malibu Bluffs could not be connected to the five coastal parks and the proposed trail system that would link the parks (Malibu Bluffs is located opposite PCH from the other parklands), and thus this alternative would not meet the project objectives and public needs addressed by the LCP Amendment.

3. Tuna Canyon Park - This is a 1256-acre park owned by the Conservancy located between Las Flores Canyon on the west and Tuna Canyon on the west. This park is not a feasible alternative because it is not accessible from PCH. Tuna Canyon Road at PCH is a windy, single-lane, one-way road that outlets at PCH. Access to Tuna Canyon Park is several miles inland at the juncture of Saddle Peak Road and Ferndale Pacific Road, a couple miles from Topanga Canyon Boulevard and

therefore could not be connected to the five coastal parks included in the Overlay and the proposed trail system that would link the parks, has no potential for direct access to the shoreline, and thus would not meet the project objectives and public needs addressed by the LCP Amendment.

4. Solstice Canyon Park and the Zuma/Trancas Canyon Units of the Santa Monica Mountains National Recreation Area (SMMNRA) - These coastal parklands are owned by the National Park Service and have many of the same qualities as the parklands included in the Overlay, and portions of the planned trail system extend through the federal property at Solstice Canyon Park and to Zuma/Trancas Canyons at the westernmost end of the Overlay. The NPS SMMNRA General Management Plan does not specifically identify camping as proposed uses at Solstice Canyon Park and Zuma/Trancas Canyons. The feasibility of camping at these locations cannot be ascertained at this time. This would require extensive Federal review that would include adoption of a development concept plan and National Environmental Policy Act review, and may require an amendment to the General Management Plan. NPS is a different landowner than the Conservancy and MRCA and there is no level of certainty at this time that NPS would ever entertain the possibility of creating campsites at these locations.

### **4.1.2. Recreation Support Facilities, Park Offices and Public Programs**

The SAIC analysis purports to look at alternative locations for public programs included in the Overlay including events, accessible overnight camping, trail camps, and office space. The alternative location discussion focuses only on the uses proposed at Ramirez Canyon Park and cites that of the 554 parcels owned by Conservancy/MRCA, 92 parcels are located near roads and subsequently are more suitable for the uses proposed at Ramirez Canyon. The discussion goes on to state that additional research is necessary to determine whether some of the parcels are actually suitable or not. SAIC lists the 92 parcels that, in their opinion, may be suitable for office buildings, special events, accessible overnight camping, and trail camps. However, of interest is the fact that of the parcels listed, and based directly on the footnotes for Table 5, Alternatives Analysis Parcels, used by SAIC in determining suitability, none are identified as providing a suitable alternative. Very few parcels are identified with the potential to build or develop facilities for the public programs included in the Overlay, while the vast majority of the parcels identified were determined to be unsuitable, as noted with an “N” in their Table 5, which refers to the following:

- Office and Events: N = no existing buildings that could be used for office space.
- Overnight Camping: N = no disturbed or open space areas where such camping facilities could be built.
- Trail Camp: N = no existing trails and dense vegetation that would have to be cleared, also fire hazard.

#### 4.1.2.1. Offices

SAIC begins with a flatly erroneous, apparently uninformed statement - "Public agencies, including park and recreation districts, generally have their offices in buildings within a commercial area." City and county agencies have their offices within the city or county in which they govern, while regional and state agencies will occupy buildings on their own property if feasible, since it provides a way to reduce costs rather than pay unnecessary office leases. In most cases where agencies occupy buildings in commercial areas, it is generally due to a lack of alternatives available on their own properties. The Conservancy/MRCA are fortunate to own property that provides the ability to operate from within their own parks, instead of having to lease expensive commercial office space often far removed from the resource they serve. In any event, there are many instances in which agency offices occupy parklands for the reasons discussed above:

1. California Department of Parks and Recreation (CDPR) - 100% of CDPR administrative offices are located on State Parks property. The headquarters of the Angeles District of State Parks is located at Malibu Creek State Park at the adaptively reused Hunter House and a specially constructed office facility at 1925 Las Virgenes Road, Calabasas. The headquarters of State Parks, Topanga Sector, is located at Will Rogers State Historic Park. The headquarters of State Parks, Coastal Sector, is an adaptively used residence at 40000, 40006, and 40040 Pacific Coast Highway, Malibu. State Parks' Los Angeles Sector headquarters at the Los Angeles State Historic Park are located right at the Park, 1245 N. Spring Street, Los Angeles, CA 90012.
2. Resource Conservation District of the Santa Monica Mountains - The headquarters are located at the park, Peter Strauss Ranch, 30000 Mulholland Highway, Agoura Hills, CA 91301.
3. The National Park Service (NPS), Santa Monica Mountains National Recreation Area - has its operational headquarters at Diamond X Ranch, next to King Gillette Ranch.

SAIC's table on page 54 is erroneous as well:

1. The San Gabriel and Lower Los Angeles Rivers and Mountains Conservancy (RMC) - the administrative offices of the RMC are no longer at the address listed; they moved from their urban office building space to a park site they own (El Encanto) so as to be near the resource they manage and so as save money on rent being in their own facility. They are located on the San Gabriel River on one of the RMC's park properties, El Encanto (100 N. Old San Gabriel Canyon Road, Azusa), at one of the major gateways to the Angeles National Forest.

2. The National Park Service (NPS), Santa Monica Mountains National Recreation Area - as noted, the operational headquarters are at Diamond X Ranch and, by agreement with the Conservancy and MRCA, it intends to co-locate its offices with the California Department of Parks and Recreation (CDPR) at King Gillette Ranch, if determined feasible and appropriate.
3. The Nature Conservancy - this is not a public agency, but rather a national non-profit. It has no park facility in this region on which they could locate their offices.
4. The Baldwin Hills Conservancy - The Conservancy does not own the land subject to its jurisdiction, and that land is an active oil field with no buildings. Its administrative offices are, however, close by in Culver City.
5. Los Angeles County Parks and Recreation Department - County Parks and Recreation operates conventional, municipal parks. It has an enormous administrative staff which is headquartered at the Vermont Avenue address indicated. It provides no parallel to the situation here.

SAIC states that King Gillette Ranch has existing buildings that could be used for offices as an alternative to the offices currently used at Ramirez Canyon Park. However, potential uses of King Gillette Ranch must be evaluated in light of the Cooperative Management Agreement and Task Agreement between the Conservancy, NPS, CDPR, and MRCA for the property. These agencies are partners in a Cooperative Management Agreement for the Santa Monica Mountains National Recreation Area and were partners in the purchase of King Gillette Ranch. The agencies are currently conducting a planning process for the King Gillette Ranch Design Concept Plan which emphasizes visitor-serving and environmental education uses, and is contemplating the collocation of park administrative offices for NPS and CDPR on the campus, demonstrating again that, whenever feasible, park agencies will occupy buildings on park property since it provides a way to reduce costs, thus preserving funds to carry-out their agency missions, and allows agency personnel to work within or in proximity to the jurisdiction and/or resources they serve. NPS contributed \$2.5 million to the purchase of King Gillette Ranch in anticipation of creating the headquarters and visitor serving hub for the Santa Monica Mountains National Recreation Area. NPS has maintained its administrative offices in Thousand Oaks only as a temporary lease extension with the City until the long-envisioned collocation of NPS and CDPR personnel can be accommodated at or near King Gillette Ranch. However, it has been determined to be potentially infeasible to locate the NPS and CDPR administrative offices on the campus of the Ranch without either displacing visitor-serving needs, or constructing an entirely new building or significant building addition due to the space needs of National Park Service and State Parks alone. Even with the significant building modifications at King Gillette Ranch potentially needed to accommodate the administrative offices for NPS and CDPR, there would be little to no additional space available for Conservancy/MRCA personnel. With the limited office space potentially available at King Gillette Ranch, it is most reasonable and prudent to accommodate NPS and CDPR administrative offices at the Ranch, which would compliment the NPS operational headquarters located directly

adjacent to King Gillette Ranch at Diamond X Ranch, and the headquarters of the Angeles District of State Parks (CDPR) that is located at Malibu Creek State Park, also directly adjacent to the Ranch.

The Conservancy/MRCA does not seek to use Ramirez Canyon Park as a “regional office complex or commercial event center” as RCPF claims. The Conservancy/MRCA seek to use existing, legal facilities located in disturbed areas in an existing parkland designated and zoned for public park use from which to conduct the administrative responsibilities associated with operating specialized public outreach programs at the Park, conducting open space acquisitions, planning, research, and the management of conservation of parklands in the coastal zone.

The Conservancy proposes to continue the administrative office use it has had for 12 years at Solstice Canyon Park in Malibu at Ramirez Canyon Park. With the sale of Solstice Canyon to NPS, the same Conservancy employees moved their offices to Ramirez Canyon Park. The Conservancy/MRCA adaptively reuses the buildings on the properties it acquires. It does not have funds to expend for rental or acquisition of office space or for construction of other office facilities; if it spent money for that purpose, there would far less money available for the Conservancy/MRCA to utilize for land acquisitions, park maintenance and park programs. That is one reason that, like CDPR and NPS (above), it utilizes its own public park property for that purpose.

Ramirez Canyon Park is geographically centered for the administrative uses required to serve the Santa Monica Mountains and Malibu area. The nature of the 14-15 employees that work at this park are limited and strictly associated with the administration of the park properties in this region. They include offices for the Executive Director (Conservancy)/Executive Officer (MRCA), the Chief Deputy Executive Director/Chief Deputy Executive Officer, the administrative assistant, and the MRCA Board Secretary. They additionally include the Natural Resources Group (3 persons), which deals with the planning for this LCP Amendment, the follow-on Public Works Plan and specific public works projects that will tier off of it, studies on the watershed, habitat restoration, and trail planning. It further includes the two staff persons who run the public programs at the Park, a residence for an on-site ranger, and it also operates as the Conservancy/MRCA Western Sector Emergency Command Center for fire/disaster/public safety emergencies.

Because of the developed nature of the property and residences developed by Barbra Streisand, the property is unique and well-suited for the types of programs and special events conducted on-site. The primary buildings at Ramirez Canyon Park have all been used as “recreational facilities” and as a location to conduct or manage recreation uses at the Park. The Barn serves as the main indoor venue for senior and disabled tours of the Park and its grounds. The Staff who operate and plan for outreach programs – including programs for senior citizens, disabled and disadvantaged persons, inner-city and at-risk youth, veterans, and battered women – operate out of the Barn, as do volunteer docents. By agreement with the City, pending resolution of the LCP amendment, Garden Tours by reservation to the general public have been suspended.

However, the LCP amendment proposes to resume the Garden Tours by reservation to the general public, and the Barn is the central meeting location for tour participants. The Peach House has in the past and will again be part of the Garden Tour visits. The Barwood and Art Deco Houses similarly have been part of the Garden Tours. Additionally, all three buildings have been and will be used for park-related conferences, retreats, recreational events, and paid reserved events. The site also includes a residence for an on-site ranger, and it also operates as the command center for Conservancy/MRCA fire safety for this and the Conservancy or MRCA-owned properties in this area. Other employees with no linkage to the day-to-day operations of the Park, such as the accountants and lawyers, are located at the River Center in downtown Los Angeles. Interestingly, no concerns or comments were expressed over the Conservancy's previous office uses at Solstice Canyon Park, a parkland located within the City and subject to the ESHA overlay designation. It is curious that it appears to be acceptable for the Conservancy administrative personnel to occupy parklands within the City, as long as it is not Ramirez Canyon Park.

### **4.1.2.2. Special Events**

The SAIC analysis considered 92 parcels in its alternatives analysis for park events. The report states: "None of the 92 parcels evaluated have good road access, previously disturbed areas that could be used for parking, and open areas (lacking dense brush) that could provide space for outdoor events in a park-like setting at a distance from urban development that would preclude noises." (P. 59.) An interesting conclusion that highlights the very reason that Ramirez Canyon Park, the previously developed and meticulously landscaped grounds that provide space for events in a park-like setting, is a feasible and reasonable location, and a unique and rare opportunity, to support the public programs and limited events proposed. That said, SAIC identifies two possible alternative locations - King Gillette Ranch and the Conservancy's Franklin Canyon Park, above Beverly Hills. The latter has no connection to the coastal zone or any coastal resources and a different ambience, and neither park provides the unique setting provided by the Malibu Parks Public Access Enhancement Plan Overlay.

The proposed special event program, along with other proposed limitations on park uses at Ramirez Canyon Park (daily vehicle trip and other public program limitations), is responsive to identified site constraints and land use compatibility issues (park access, noise, etc). In this regard, the Overlay includes policies that require the special event program be limited to only 32 events/ year with additional limitations on an allowable event season (March-October), participants (200), event cancellation requirements during red-flag and flash flood warnings, and identification of specific noise thresholds.

The special event program at Ramirez Canyon Park, as contemplated in the Overlay, is wholly consistent with typical uses permitted at California State Parks. As indicated above, the Overlay District will establish a Malibu Parks Affordable Access Fund, supported by net proceeds of special event uses at Ramirez Canyon Park, to fund a Malibu Coastal Camping Program. It is anticipated that each special event at Ramirez

Canyon Park would yield approximately \$1,000 of net proceeds, and could therefore fund approximately 20 participants in one overnight program event. The camping experience funded by the Malibu Parks Affordable Access Fund is designed to provide urban, disadvantaged youth with their first overnight camping experience. The MRCA will provide all necessary transportation, meals and equipment, and will deliver a program dedicated to teaching novice and first-time campers proper use of camping equipment, environmental awareness and outdoor leadership skills. Research shows that camping strengthens self-confidence, improves school performance, and builds inter and intra-personal skills, and interpretive programs introducing the resources of our local mountains and coast will promote stewardship of our local natural areas. As such, the special event program at Ramirez Canyon Park would support the primary purpose of the LCP amendment to maximize and prioritize recreational opportunities in specific parkland and recreation areas in Malibu by facilitating a new public camping program for all people, including those who might otherwise have limited opportunity to enjoy the resources of the Malibu coastal area.

### **4.2. Denial of the LCP Amendment (*No Action Alternative*)**

Because the public improvements being considered in the Overlay are already allowed under the existing LCP, denial of the proposed LCP amendment would not change the fact that the basic parkland uses and facilities being considered have the potential to be developed at the subject parklands; however, denial of the Conservancy/MRCA LCP amendment would not expedite coastal public access and recreational facility improvements to and between specific Conservancy/MRCA-owned parklands in the City, and thus would hinder efforts to maximize public access and recreation opportunities as mandated by certified LCP and the Coastal Act.

The City of Malibu certified LCP designates the Conservancy/MRCA parklands as public open space consistent with other parks located within the City's jurisdiction. The City's LCP states:

*The OS designation provides for publicly owned land which is dedicated to recreation or preservation of the City's natural resources, including public beaches, park lands and preserves. Allowable uses include passive recreation, research and education, nature observation, and recreational and support facilities.*

In addition, Table 2 Permitted Uses, of the LCP Local Implementation Plan indicates that the following uses are permitted uses in the OS Zone:

- *equestrian and hiking trails*
- *wildlife preserves*
- *camping*
- *parks, beaches and playgrounds*
- *public beach accessways*
- *recreation facilities (including swimming pools, sandboxes, slides, swings lawn bowling, volley ball courts, tennis courts and similar uses)*

- *educational (non-profit) activities are primary permitted uses in the OS Zone*

City-wide, the public open space land use and zoning designation clearly reflect a wide variety and range of public parkland uses and recreation facilities, collectively consisting of passive and active recreation, research and education, nature observation, a range of support facilities, including those at Bluffs Park, Zuma County Beach, Ramirez Canyon Park, Adamson House, and Malibu Lagoon State Park.

The Coastal Commission applied the open space land use designation and zoning to Ramirez Canyon Park upon LCP certification with full knowledge and authorization of the existing facilities and uses addressed pursuant to Coastal Development Permit 4-98-334, thereby rendering the Conservancy/MRCA park uses conforming with applicable land use and zoning policies of the certified LCP (prior to certification of the LCP the Ramirez Canyon Park property was designated rural residential). The RCPF implies, however, in their letter of December 23, 2008, that in certifying the City's LCP the Commission essentially intended to render the Conservancy/MRCA uses of Ramirez Canyon Park (authorized by the Commission pursuant to Coastal Development Permit 4-98-334) unlawful or perhaps legal, nonconforming with the certified LCP. If this were in fact the case and the RCPF interpretation of the City's LCP related to permitted uses and facilities for lands zoned open space were correct, then certification of the City's LCP also resulted in rendering unlawful or legal, nonconforming the existing uses and facilities at the City's Bluffs Park, Adamson House, Solstice Canyon Park, and Malibu Lagoon State Park, which we don't believe to be the case.

The fact of the matter is that the certified LCP is not explicit in listing every conceivable park and recreation use and support facility necessary to operate and maintain a variety of parklands. However, reason, precedent and sound parkland planning practices have resulted in local, state and federal park agencies often utilizing the land resources they have within the park areas they protect and serve to accommodate a variety of support facilities to provide and enhance opportunities for the public to access and enjoy the resource, including facilities for trailheads, public parking, restrooms, day-use areas, interpretative maintenance facilities, and park administrative uses. The Conservancy/MRCA does not seek to use Ramirez Canyon Park as a "regional office complex or commercial event center" as RCPF claims. The Conservancy/MRCA seek to use existing, legal facilities located in disturbed areas in an existing parkland designated and zoned for public park use from which to conduct the administrative responsibilities associated with operating specialized public outreach programs at the Park, conducting open space acquisitions, planning, research, and the management of conservation of parklands in the coastal zone.

As such, no change in already permitted land use is proposed by the Conservancy/MRCA LCP amendment. The Overlay simply serves to supplement existing LCP policies and implementation measures to enhance and expedite coastal public access and recreational facility improvements to and between specific Conservancy/MRCA-owned parklands in the City, and thus carry out the public access and recreation goals of the certified LCP and the Coastal Act.

The “No Action” Alternative would reasonably result in the development of the park and recreational uses as contemplated in the Overlay. However, future improvements would not necessarily be guided by comprehensive and a long-term management program, subject to the site specific and detailed policies of the Overlay, to ensure potential impacts to coastal resources are minimized to the greatest extent feasible. It is likely that as visitation and use of the parklands addressed in the Overlay increase overtime, the lack of adequate parking and staging areas provided by the Overlay may impact adjacent residential neighborhoods from overflow parking associated by park and trail users. Without adequate park support facilities that concentrate public use in appropriate park areas, as provided by the Overlay, it is also more likely that public uses will spill over into sensitive habitat areas potentially impacting coastal and environmental resources. The Overlay considers the public need for public access and recreation, and issues and opportunities at each parkland to address that need, in a comprehensive manner such that policies can be developed and considered to ensure a balanced approach to meeting the public need while minimizing substantial impacts to resources and ensuring land use compatibility. As such, the Overlay includes limitations and restrictions on park uses, not currently required by the Malibu LCP, to address issues and opportunities in a balanced manner and in light of the opportunity to balance solutions among three Conservancy/MRCA-owned parklands. For these reasons, the “No Project” alternative has the potential to create more adverse environmental impacts than the proposed LCP amendment, while at the same time not accomplishing the objectives of the LCP amendment and thus perpetuating a condition in which the public need and demand for public access and recreation is not being met as required by the Coastal Act.

### **4.3. LCP Amendment with Reduced Parkland Development/Use Alternative**

#### City of Malibu Proposed LCP Amendment

The City of Malibu proposed LCP amendment purports to increase and enhance public access and recreation opportunities in Malibu. While the City’s LCP amendment would implement much of the Conservancy/MRCA-proposed trail program, the City’s LCP amendment would result in significant, adverse environmental impacts on recreation and sensitive habitat resources for which neither City nor RCPF have provided any reasonable justification, and no identified mitigation.

The City’s trail program would certainly facilitate implementation of the trail system the Conservancy/MRCA have developed for the Overlay; however, the City’s LCP amendment includes very little of the critical support facilities that are necessary to support visitor access to the trail system. In particular, the City’s LCP amendment includes new policies that would obstruct any reasonable effort to develop trailhead facilities for Escondido Canyon Park. The public would instead be left with limited trailhead and parking resources located at the Winding Way parking area (approximately 1-mile away from the Park) and the proposed, 10-space parking area off of Latigo Canyon Road that would be approximately 1/3-mile from the Park. Neither of

these locations could support ADA access to Escondido Canyon Park. In addition, by amending the City's LCP to prohibit all camping opportunities in Malibu, there is little to no opportunity to provide low-cost overnight accommodations from which visitors can experience and enjoy the extensive, regional trail system that would provide multiple days of recreation throughout the Santa Monica Mountains/Malibu coastal area. Absent any opportunity for low-cost overnight accommodation and with reduced or no parking opportunities at the Conservancy/MRCA parklands, the trails required by the Commission or acquired by the Conservancy with state funds provide only hiking opportunities for Malibu residents and Malibu equestrian users, thus resulting in a significant, adverse impact to recreation resources. The City's reduced scale LCP amendment provides no mitigation for this impact.

As justification for the City's action on the LCP amendment, the City and RCPF offer primarily the risk of fire hazard<sup>2</sup>. As opposed to the City's LCP amendment submittal, the SAIC report, commissioned by the RCPF, at least attempts to provide an analysis of the potential fire hazard issue. However, the SAIC report does not succeed in providing any supportable documentation, evidence or reasonable justification for prohibiting camping as proposed by the Overlay.

The SAIC report highlights the number of wildland fires in Los Angeles County from 1987-2007 and of the 439 fires identified, 8 are listed as being caused by campfires. By presenting this data, SAIC appears to assume that these 8 fires were caused by campfires in developed campgrounds, an assumption that is unsubstantiated from the reference given (CDF 2008, website). All of the referenced Los Angeles County "campfire-caused" fires were in the Angeles National Forest. A personal interview with Angeles National Forest staff revealed that there have been no known fires caused by campfires in developed campgrounds. As such, it is more likely that the campfires referenced in the SAIC report were started outside of official campgrounds, and therefore the data is not relevant to the camp areas planned for the Overlay parklands and the data does not support an argument that the Conservancy's and MRCA's LCP amendment will increase the fire risk in the Malibu. This conclusion is supported by testimony provided by Park personnel and professional fire-trained personnel during the City's deliberations on the Conservancy/MRCA proposed LCP amendment<sup>3</sup>.

The SAIC report actually acknowledges that fire department statistics demonstrate that campgrounds have very low risks for fire, with arson being the leading cause. However, the document goes on to state that by opening up previously unopened land to people

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<sup>2</sup> Additional arguments related to resource impacts have been presented by the RCPF and SAIC as justification to prohibit camping in Malibu. ESHA protection policies of the certified LCP and applicability to the proposed Overlay are discussed and presented in more detail in documentation included in the Conservancy/MRCA LCP amendment submittal Policy Consistency Analysis.

<sup>3</sup> See City of Malibu Environmental Review Board Recommendation, August 1, 2007, with comments provided by Environmental Review Board Suzanne Goode (California State Parks) at the July 25, 2007 meeting, and City Council Hearing, November 11, 2007, comments provided by Ron Schafer (California State Parks), Woody Smeck (National Park Service), and Frank Padilla (California State Parks Fire Chief).

will increase the risk of wildfire. The issue of fire safety for the Overlay is better defined in terms of increasing access, recreation and educational opportunities at parklands already opened to the public in a carefully planned and controlled manner where the associated increased patrols and better education of visitors would result in the lowering the potential of fire risk, just as has been demonstrated at other camp areas throughout the state. To further address the fire hazard issue, the Conservancy and MRCA's LCP amendment proposes numerous fire protection regulations that are more restrictive than those already in place by State Parks in campgrounds in the Santa Monica Mountains. The Conservancy/MRCA LCP amendment proposes cold camping (i.e., outright prohibition on campfires at all facilities), vegetation modification to reduce potential fuels adjacent to camp areas, prohibition of camping on red flag days, provision of special fire-proof cook areas, prohibition of camping on red flag days, provision of special fire-proof cook stations and fire protection apparatus, and mandated park patrols, to name a few.

Therefore, without reasonable and sound justification, the City's LCP amendment simply seeks to prohibit camping in Malibu, an action that is undeniably and grossly inconsistent with the City's certified LCP and Coastal Act. Camping is one of very few methods with which to provide low-cost overnight accommodations in the Coastal Zone as required by the City's LCP and the Coastal Act, and is a recreational resource that is clearly in high demand. To prohibit camping in Malibu would result in a significant and unmitigable adverse impact to recreation. The City makes no attempt to mitigate the impact to recreation that would occur as a result of the City's LCP amendment, nor could there be any feasible mitigation available since camping is a unique resource that allows visitors and recreationists to experience a parkland, natural and coastal resources like no other overnight accommodation could.

Furthermore, the City's LCP amendment essentially eliminates all reasonable public use of Ramirez Canyon Park, pending construction of an alternative vehicle access to the Park from Kanan Dume Road, which would require non resource-dependent development in a designated Environmentally Sensitive Habitat Area (ESHA), an action strictly prohibited by the Malibu LCP and the Coastal Act. The City's LCP amendment submittal and December 23, 2008 correspondence from the RCPF argue for the alternative access road that would involve, unequivocally, an unpermitted land use in ESHA, and would result in direct grading and vegetation impacts to ESHA. At the same time, the City and RCPF argue against trailhead improvements, camping resources and support facilities that are permitted land uses and are designed to avoid ESHAs at the parklands they are intended to serve. In addition, the City's LCP amendment submittal conveniently leaves out the fact that, at the time the City took action on the proposed LCP amendment before it, the City was well aware of the fact that the alternative access road concept from Kanan Dume Road was determined, in consultation with Coastal Commission Staff, to be infeasible due to the unpermitted impacts to ESHA that would result. Yet the City and RCPF continue to argue for this condition on allowing any reasonable public use of Ramirez Canyon Park (only uses associated with administrative offices for up to 15 employees, a residential caretaker, and only two special programs a week for disabled persons and/or for seniors would be allowed) pending development of the alternative access road. The City's LCP amendment offers

no mitigation for the significant, adverse impact to recreation resources and public education programs that would be offered at Ramirez Canyon Park.

#### **4.4. Revised Overlay Concept Development Plans and Policies (*Redesign Alternative*)**

The various public hearings, comment letters, and efforts of agency coordination on the previous Public Works Plan planning effort and the subsequent LCP amendment process before the City have resulted in review, consideration, and incorporation of several alternatives and revisions for the proposed Overlay. Conceptual plans for the Overlay have been incorporated in many instances to remove, relocate, and scale back conceptual park and trail improvements to ensure that the contemplated uses and improvements are compatible with resource protection efforts and surrounding residential neighborhoods, while still meeting the needs and desires of the public seeking recreation in the Malibu area. These revisions have included locating conceptual camp areas closer to primary parkland access points and further clustering of campsites to reduce development footprint and to avoid ESHA impacts, and acquisition of the Latigo property to provide additional public parking resources to support access to Escondido Canyon Park and the surrounding trail system while minimizing vehicles trips along Winding Way. In addition, policies of the Overlay have undergone substantial revision throughout the process resulting in site-specific and detailed policies that address potential resource impacts, hazards and land use compatibility issues, which would be imposed on any future development implementation pursuant to the Overlay. Several revisions to the LCP amendment have already been completed at this policy and conceptual level in the planning process and more specific design alternatives would be completed when the Conservancy/MRCA move forward with implementation of the Overlay improvements pursuant to the applicable environmental review /entitlement process.

## **5. ENVIRONMENTAL ISSUES DISCUSSED IN THE SAIC REPORT**

### **5.1. Environmentally Sensitive Habitat Areas (ESHA)**

The RCPF letter of December 23, 2008 and attached SAIC report argue that none of the existing activities at Ramirez Canyon Park are allowed in ESHA designated areas. The argument lacks a basic understanding of the Malibu LCP and applicable policies relating to ESHA determinations, ESHA protection, and public access and recreation policies that specifically allow for recreational and park support facility improvements within natural parklands, all of which within the City are designated and zoned OS and subject to the ESHA Overlay designation (with few minor exceptions, such as the area of Escondido Canyon Park where public parking is proposed which is not subject to the ESHA Overlay).

Contrary to the arguments presented, lands subject to the public open space designation (POS) and the ESHA Overlay are not consequentially without the potential

to develop the specific uses permitted pursuant to the POS land use and zoning designation. Such an interpretation would render the majority of the City's parklands unusable even as it relates to developing specific recreational uses permitted by the LCP. Alternatively, application of the ESHA Overlay recognizes the inherent tendency of publicly owned lands to contain sensitive resources thus making the ESHA protection policies of the Coastal Act and LCP applicable, as appropriate and when site-specific biological study has determined the presence or absence of ESHA. The LCP ESHA protection policies therefore provide that site specific information be evaluated and presented in a biological study conducted, as was done for the proposed LCP amendment application, to determine the presence of ESHA and therefore allowable uses. LUP Policy 3.7 of the City's certified LCP provides that an area not meeting the definition of ESHA is not subject to the ESHA protection policies of the ESHA Overlay and may be developed consistent with all other applicable LCP policies. This is the case for Ramirez Canyon Park, where all public program improvements and uses would be accommodated in areas that do not constitute ESHA, based on site-specific biological study.

As with the other conceptual improvement areas subject to the Overlay, Ramirez Canyon Park has been evaluated for site constraints related to ESHA and other coastal resources in developing the proposed policies and implementation measures for the location and level of park uses included in the Overlay. The conceptual park administrative support facilities located at Ramirez Canyon Park are appropriately sited within the limits of existing development envelopes and buildings. All existing buildings and other appurtenant structures located at Ramirez Canyon Park are documented to have been constructed per approved building permits and prior to the effective date of the Coastal Act, and thus have resulted in a significantly disturbed and manicured environment.

In addition, pursuant to the City's LCP ESHA designation, *"Existing, legally established agricultural uses, confined animal facilities, and fuel modification areas required by the Los Angeles County Fire Department for existing, legal structures do not meet the definition of ESHA."* (Emphasis added) As such, much of the property within and directly adjacent to the existing development envelopes associated with the previous use of Ramirez Canyon Park as an estate compound, as well as those adjacent areas subject to required fuel modification for existing structures, do not meet the City LCP definition of ESHA. These structures are existing and would not require fuel modification beyond existing conditions.

Although the site has been subject to past disturbance resulting in diminished habitat value, consistent with the ESHA definition of the LCP, Ramirez Canyon Creek is afforded special treatment as a habitat area of significance pursuant to the policies and standards in the LCP applicable to streams and, therefore, the proposed Overlay includes provisions for a substantial creek restoration plan for Ramirez Canyon Creek within the Park's boundaries.

## **5.2. Stream ESHA and Water Quality**

The SAIC report cites a number of site improvements contemplated for the parklands subject to the Overlay (although many are inaccurately described and the scope exaggerated), and notes potential impacts to riparian corridor ESHA and water quality that could result from the improvements included in the Overlay. The Conservancy/MRCA concur that potential impacts to riparian ESHA and water quality could occur with any new development proposal for the parkland areas, and therefore have developed within the Overlay a range of policies and implementation measures that ensure maximum protection and, where feasible, enhancement of ESHA and water quality. All the conceptual parkland improvements would be analyzed for consistency with applicable ESHA and water quality protection policies of the certified LCP and therefore could not be approved and implemented unless found to avoid or minimize substantial impacts to the resources. Additional analysis of potential impacts to ESHA and water quality, and identification of appropriate mitigation measures, would follow with a subsequent project-specific proposal and the associated environmental review process to ensure the improvements would not result in significant impacts to ESHA and water quality.

## **5.3. Traffic**

SAIC attempts to discount a number of site-specific, professional traffic analyses prepared for the proposed park uses at Ramirez Canyon Park by first questioning the methodology in which the self-imposed limitation on traffic trips (40 round trips/day) for park uses was determined, and then the legality of the developed lots that constitute the Park. SAIC relies on “information obtained from long time residents of the area” (unlike the reliable, unbiased, professional, and expert source which the Conservancy/MRCA used to establish a baseline for traffic engineering purposes [see below]) to conclude that “there have never been six ‘estate homes’ on the property”, and then suggests that the LCP Amendment submittal includes no evidence that the 6 parcels (5 of which are already developed with estate homes) are legal and thus could not be sold separately as individual residential sites. SAIC therefore determines that expected traffic generation by residential use of the individual parcels is an inappropriate baseline for traffic engineering purposes and is inconsistent with standard traffic engineering practices.

The 6 individual lots that constitute Ramirez Canyon Park have been recognized by both local and State agencies as legal lots as evidenced by the numerous agency development permits issued for the existing onsite development and, in particular, those development permits issued for the residences onsite (see also Riparian Habitat Evaluation, prepared by LSA Associates, Inc, August 30, 2002, with detailed development history of the property, and Coastal Commission Staff Report Findings, July 22, 2000). Therefore, there is little question as to the legality of the Ramirez Canyon Park parcels and the legal right to otherwise sell the 6 parcels as individual estates (a residential scale typical of Malibu development) if not used for Park purposes.

Associated Transportation Engineers (ATE) reviewed the SAIC analysis of traffic issues for Ramirez Canyon Park and confirmed the accuracy and validity of the trip estimates determined by Crain & Associates for a residential baseline of the 6 existing, legal lots that constitute the Park (see attached Memo prepared by ATE, dated May 26, 2009). The traffic analysis completed by Crain and Associates for Ramirez Canyon Park recognized the 6 legal residential estate lots constitute Ramirez Canyon Park and estimated weekday and weekend traffic generation for the lots using data contained in the Institute of Transportation Engineers (ITE) trip generation report (5th Edition). The ITE report contains base rates for single family homes on weekdays and of weekends, and also provides adjustment factors for the base trip rates to account for larger homes with higher vehicle ownership characteristics based on data published by the Federal Highway Administration. Based on these adjusted rates, the trip estimates for the 6 estate lots would be 75 average daily trips (ADT) on weekdays and 79 ADT on weekends. Because ADT are normally expressed as even numbers (one trip in and one trip out) the estimates were appropriately rounded to 76 ADT for weekdays and 80 trips for weekends.

ATE also researched trip generation data contained in the SANDAG Traffic generators report to verify the results of the Crain analysis. The SANDAG report provides a rate of 12 trips/unit on weekdays for residential estates. Assuming the weekday to weekend ratio presented in the ITE report, the weekend rate for the SANDAG data would be 12.8 trips per unit. Based on the SANDAG data, the trip generation estimates for the 6 estate lots would be as follows:

Weekdays 6 Estates x 12.0 = 72 ADT

Weekends 6 Estates X 12.8 = 77 ADT

These trip estimates are very close to the estimates developed by Crain and Associates and confirm the validity of the trip estimates for the 6 legal lots on site, which were in turn used to establish the self-imposed 40 round trips/day limitation for the proposed Ramirez Canyon Park uses.

SAIC is apparently misinformed of the circumstances under which the proposed 40 round trips/day traffic limitation has been established for Ramirez Canyon Park (utilizing an appropriate residential baseline to ensure park uses do not exceed traffic trips that would otherwise be generated by residential use of the property), and the numerous proposed LCP amendment policies that require enforcement of the proposed trip limitation and Emergency Access and On-Site Parking Plan. The proposed 40 round trips/day limitation for the Park would govern all uses of the property, irrespective of the fact that far greater trips than that proposed for the Park uses could be accommodated on Ramirez Canyon Road, presently operating with a Level of Services A (see ATE Traffic and Parking Study, August 21, 2007), without causing a significant traffic impact, and irrespective of the number of parking spaces onsite and potential visitor turn-over that, SAIC claims, would result in greater traffic trips (SAIC also misses the fact that the Emergency Access and On-Site Parking Plan requires all vehicles at the Park to use

designated parking areas, and therefore, parking would not be expanded outside of designated parking areas and thus result in even greater traffic generation, as suggested.)

The SAIC report further confuses the methodology the traffic consultants used to determine and substantiate trip generation rates for the parklands subject to the Overlay. The Crain & Associates and ATE traffic studies relied on standard ITE Manual and San Diego Traffic Generators Manual trip generation data for parkland uses for their respective analyses. This data was also supplemented with traffic data collected locally at nearby Santa Monica Mountains National Recreation Area (SMMNRA) parklands consisting primarily of open space and with limited support facilities to substantiate the ITE rates used for those Overlay parklands that also consist primarily of open space and with limited support facilities. This same methodology is obviously not applicable to, or appropriate for, a traffic generation assessment for Ramirez Canyon Park as suggested by SAIC. This comment fails to reflect that the Crain & Associates and ATE traffic studies intentionally did not conduct traffic generation studies for Ramirez Canyon Park uses due to the proposed limitation on traffic trips to 40 round trips per day for Ramirez Canyon Road, found to be operating at an excellent Level Of Service (LOS A) based on traffic counts conducted by Associated Transportation Engineers. The SAIC comments further fail to acknowledge that the greater level of existing amenities at Ramirez Canyon Park would, under normal circumstances and without the proposed trip limitation, generate a higher trip generation and parking demand more similar to a city park as opposed to parklands consisting primarily of open space and with limited support facilities. The proposed trip limitation of 40 round trips per day for park uses are a response to concerns expressed over the uses proposed for Ramirez Canyon Park and compatibility with surrounding land uses.

#### **5.4. Noise**

The SAIC report states that the LCP Amendment proposal provides insufficient information to conduct a thorough and quantitative analysis of community noise that could result from the activities and events that are planned for the property. This is true, in part, since this detailed and technical level of information is not typically analyzed at this conceptual, policy level. What is considered at this conceptual, policy level, however, is the potential land use and environmental impact issues associated with the proposed land use that might result in an inconsistency with the certified LCP or the Coastal Act. For this reason, the proposed Overlay includes policies and implementation measures to address potential land use impacts associated with park related noise issues to ensure consistency with the Malibu LCP and Coastal Act, including limitations on vehicle trips to and from the Park (allowing a maximum of 40 round trips per day), requiring that amplified music not cause a noise reading exceeding 65 dBA at the southern boundary of Ramirez Canyon Park where residential development exists, and limiting special events to a maximum of 32/year and 1/week with strict limitations on duration (8:00 a.m. - 9:00 p.m. Sunday-Thursday, and 8:00 a.m. to 10:00 p.m. Friday and Saturday). The specifics of level and type of park uses

proposed and potential impacts associated with noise would be evaluated in detail with any subsequent project-specific proposal and the associated environmental review process to ensure that park uses would not result in significant noise impacts to the surrounding community or inconsistencies with any of the above-referenced noise-related policies.

The SAIC analysis itself lacks sufficient technical information and applies a flawed methodology for the conclusions it attempts to make regarding potential traffic generated noise impacts associated the Ramirez Canyon Park uses included in the Overlay.

First, the SAIC report identifies traffic on Pacific Coast Highway as the primary noise source affecting the Ramirez Canyon area. SAIC ignores all noise sources currently generated by existing traffic on Ramirez Canyon Road, yet attempts to assess a potential noise impact only for potential traffic trips generated on Ramirez Canyon Road that would be associated with the proposed Park uses.

Second, the relationship for noise attenuation over distance from a line source (such as a roadway) results in a reduction of 4.5 dB with each doubling of distance from the noise source (for soft site conditions). Consequently, the resulting Community Noise Equivalent Level (CNEL) value at 4,500 feet from Pacific Coast Highway (given a calculated value of 55 dB at 600 feet from this roadway) would be 41.5 dB, not the 40.0 dB referenced by SAIC comment.

Third, the author asserts that noise impacts would occur if the traffic "resulted in a substantial increase in noise at these residences, either on a 24-hour average basis (e.g., CNEL) or from intermittent noise." In fact, the 24-hour average is the only significance criteria used in the assessment of transportation noise; the assessment of intermittent noise, including control techniques and governing policies, is only applicable to non transportation sources. Noise policy from the federal to the local level is based upon a 24-hour, community based, noise average.

The 24-hour average noise value associated with transportation facilities is generally applied in two ways. First, noise sensitive land uses such as residences are typically subject to maximum noise exposure in outdoor living areas, expressed in dB CNEL. For the County of Los Angeles and City of Malibu, the exterior living area criterion is a maximum of 65 dB CNEL. So if a residence is proposed in an area with existing roadway noise above 65 dB CNEL, mitigation must be provided by the residence to reduce exposure. Conversely, for an existing home near a roadway with CNEL below 65 dB, a significant impact would occur with an increase in the roadway-associated CNEL above 65 dB. Second, if a project's traffic generation would result in a substantial increase in the CNEL values associated with local roadway operations (even if the resulting CNEL remains below 65 dB), this could constitute a significant traffic-related noise impact. A substantial increase is generally considered to be at least a 3 dB increase in the CNEL value (the threshold for notice ability of the change), although many jurisdictions use 5 dB.

The author cites a "peak hour average traffic noise resulting from vans" of 54 dBA Leq at 50 feet from the roadway. Assuming this value is accurate for the peak hour, and even assuming that there are two different peak hour periods for the project traffic (one for incoming traffic and one for outgoing traffic), these two hours with Leq 50 and the remaining 22 hours of the day at Leq 40, and including applicable 5 and 10 dB penalties for evening and nighttime hours in the CNEL averaging process, would result in a change of one (1) dB to the CNEL value. Therefore, while individual vehicles might be "noticeable" in this setting, no significant noise impact would be anticipated to occur in relation to the change in CNEL value associated with project-induced traffic. Also, the resulting CNEL value would not begin to approach the 65 dB criterion for outdoor living spaces for residential land uses. These assumptions would, however, be validated via a technical noise assessment once applications are prepared for the proposed use.

The SAIC report also makes frivolous statements about the types of park uses that may generate significant noise impacts on the property. This demonstrates that the SAIC report author appears to have very little understanding of the programs planned for the parklands addressed in the Overlay. For instance, while "concerts" may have occurred on the Ramirez Canyon Park property under previous ownership (Barbra Streisand), these uses are not included in the Conservancy/MRCA park program. In addition, the report identifies "boom boxes" and "car stereos" operated by campers and "motorcycles" operating within the property as potential noise sources. These are erroneous statements and completely contrary to the proposed camping program and park experience that would be offered by the Conservancy/MRCA.

## 6. CONCLUSION

Based on the analysis and conclusions herein, it is clear that there is a demonstrated public need for the public access and recreational resources that are addressed by the Conservancy/MRCA LCP amendment request. There is no potential for the proposed Conservancy/MRCA LCP amendment to result in significant adverse environmental impacts, not only because there is no physical development that would cause a change in environmental conditions being requested or considered at this time, but also because the public improvements being considered in the Overlay are already allowed under the existing LCP. Rather, an analysis of the proposed LCP amendment override submittal and certified LCP concludes that denial of the LCP amendment override would reasonably result in the development of the park and recreational uses as contemplated in the Overlay, but such future improvements would not necessarily be guided by a comprehensive and long-term management program, subject to the site specific and detailed policies of the Overlay, to ensure potential impacts to environmental resources are minimized to the greatest extent feasible. Further, denial of the Conservancy/MRCA LCP amendment would not expedite coastal public access and recreational facility improvements to and between specific Conservancy/MRCA-owned parklands in the City, and thus would hinder efforts to maximize public access and recreation opportunities as mandated by the certified LCP and the Coastal Act.

Although no potentially significant adverse environmental impacts would occur as a result of certification of the Conservancy/MRCA LCP amendment, an assessment of reasonable and other recommended “alternatives” to the proposed LCP amendment, including those alternatives identified by the RCPF and SAIC (non of which meet the basic objectives of the Conservancy/MRCA LCP amendment), supports the finding that there is no feasible less environmentally damaging alternative that meets the public need.