

SANTA MONICA MOUNTAINS CONSERVANCY

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December 3, 2012

Ann Dove, Project Manager
National Park Service, RTCA
570 West Avenue 26, Suite 175
Los Angeles, California 90065

**Rim of the Valley Corridor Special Resources Study
Comments on Preliminary Findings and Alternative Concepts**

Dear Ms. Dove:

The Santa Monica Mountains Conservancy offers the following comments on the recently released Preliminary Findings and Alternative Concepts for the National Park Service's Rim of the Valley Corridor Special Resources Study. The Conservancy concurs with the Study's broad depiction of new areas determined to be nationally significant because of unique cultural and natural resources that they contain.

The Conservancy's legislative boundary currently mirrors the Rim of the Valley Corridor Area shown in the Study's Alternative A. This agency's extensive experience in that area continues to support the importance of these new areas determined to be of national significance by your team.

The synergy allowed by the near-total overlap of the Conservancy's boundary with the existing Santa Monica Mountains National Recreation Area boundary has produced unprecedented levels of resource protection. Agency boundary overlap is a prerequisite to adequate resource protection in complex areas both adjacent to and within a metropolis. This level of success would clearly be duplicated within any, and all areas where the boundary of the Santa Monica Mountains National Recreation Area (SMMNRA) is expanded. In addition, this level of resource protection can only be achieved with the option for National Park Service (NPS) property acquisition and management. Study Alternative B - Cooperative Conservation Partnership has merit but is inadequate without potential NPS property acquisition at a minimum.

The above proven synergy of agency boundary overlap works throughout the existing Rim of the Valley Trail Corridor Zone. Study Alternative C - also has strong merit but is inadequate because a vital resource protection partner (NPS) is eliminated from key areas in the western Santa Monica Mountains, the Simi Hills, Santa Susana Mountains, and San

Rim of the Valley Corridor Special Resources Study
Preliminary Findings and Alternative Concepts Comments
December 5, 2012
Page 2

Gabriel Mountains. The boundary of Alternative C artificially cuts off entire hill systems and halves of mountain ranges that are ecologically vital the existing SMMNRA. This alternative also eliminates all portions of the Rim of the Valley Corridor which contain the nationally significant Pacific Crest Trail.

Study Alternative D accomplishes much of what Alternative C does not provide in regards to preservation of whole geomorphological units and maintaining habitat connectivity. However, pulling a key potential agency partner out of the Verdugo Mountains, San Rafael Hills, Los Angeles River, San Gabriel Mountains, and Santa Clara River leaves scores of square miles of nationally significant area without an adequate agency team for resource protection.

Alternative D includes a vital element by encompassing a special Cooperative Conservation Partnership Area extending from the northern Rim of the Valley Corridor boundary in the Santa Susana Mountains to the Los Padres National Forest. This proposed partnership area not only completes connectivity between federal jurisdictions, it completes the critical Sierra Madre to Santa Susana inter-mountain range habitat linkage.

The only alternative that can provide adequate resource protection to all of the preliminarily determined areas of national significance is a new alternative that fully combines the area covered in Alternative D and in Alternative C. The Cooperative Conservation Partnership Area in Alternative D is fundamental to this new alternative. The attached Conservancy figure (super-imposed on Alternative D) also shows another vital Cooperative Conservation Partnership Area that should be added to the new alternative to connect the two portions of the Angeles National Forest in the Santa Clara River watershed. This addition would create seamless federal jurisdiction and complete the regional significant Angeles linkage inter-mountain range habitat linkage.

The quality, abundance, and broad distribution of nationally significant resources compiled by your team to date, all proximate to seven million people, warrant nothing less than the creation of this new geographically complete Study alternative described directly above.

Please address any future correspondence to Paul Edelman of our staff at the above address and by phone at (310) 589-3200 ext. 128.

Sincerely,

ELIZABETH A. CHEADLE

Rim of the Valley Corridor Special Resources Study
Preliminary Findings and Alternative Concepts Comments
December 5, 2012
Page 3

Chairperson