



United States Department of the Interior

NATIONAL PARK SERVICE
Santa Monica Mountains National Recreation Area
401 West Hillcrest Drive
Thousand Oaks, California 91360-4207

In reply refer to:
L76 (SAMO) /Triunfo Canyon

January 18, 2012

Mr. Travis Seawards, Regional Planning Assistant II
Zoning Permits West
Los Angeles County Regional Planning Department
320 W. Temple Street
Los Angeles, CA 90012

RE: Triunfo Canyon 67-Bed Rehabilitation Facility
3324 and 3272 Triunfo Canyon Road
Permit Nos. R2012-00482, CUP201200041, ROAK201200024

Dear Mr. Seawards:

The National Park Service (NPS) has reviewed the project description and initial study for a proposed rehabilitation facility on Triunfo Canyon Road. The facility would be located on two parcels at 3324 and 3272 Triunfo Canyon Road within the Santa Monica Mountains. The applicant proposes facilities to accommodate 67 clients with drug or alcohol abuse problems or mental health disorders and the 35 employees required to serve them. The applicant would make use of 19 existing structures, including lodging facilities, trailers, and various maintenance and operations facilities. The project would be served by existing municipal water and sewer service. Improvements for fire protection and access would encroach into the protected zone of 63 oak trees. The staff's CEQA compliance recommendation for the project is a Negative Declaration, meaning the staff has found the project could not have a significant effect on the environment.

NPS appreciates the opportunity to comment on the proposed project. In general, NPS provides comments on the effects of private and public land development in the Santa Monica Mountains at the invitation of state and local units of government with authority to prevent or minimize adverse uses. We assume a neutral position and do not support or oppose land development. We offer the following comments.

Land Use Designation and Zoning

The proposed project location is adjacent to, but outside the federal boundary for SMMNRA. The location is identified in the 2003 SMMNRA General Management Plan and Environmental Impact Statement (GMP/EIS) as part of a larger area – upper Triunfo Canyon – recommended for study for possible inclusion within the national recreation area boundary.

Upper Triunfo Canyon encompasses parts of the canyon and the south-facing slopes of Ladyface Mountain within Malibu Creek Watershed. The area features rugged and highly scenic undeveloped mountainsides and undisturbed native habitat. Triunfo Creek runs

through the canyon. Dense oak woodlands occupy the riparian corridor along the creek. There is some existing development, including several private recreation providers. The creek eventually enters federal and state parkland within SMMNRA before merging with Malibu Creek. County plans propose an extension of the regional trail system into the area: The proposed Zuma Ridge Trail to Westlake Village would serve as an important connection to the SMMNRA public trail network.

The project site is zoned by Los Angeles County as "Resort and Recreation" (R&R) and is within the Santa Monica Mountains Community Standards District. The R&R zone is very limited within the Santa Monica Mountains and recognizes historic recreation facilities along Triunfo Canyon Road, Mulholland Highway and roads in the vicinity of NPS-owned Peter Strauss Ranch. Lake Enchanto, a theme park located at the present Peter Strauss Ranch, was a premiere public facility in the 1940s and 1950s (Peter Strauss Ranch Cultural Landscape Inventory, 2006).

The County's R&R zone is consistent with both NPS management goals for SMMNRA and the County's Santa Monica Mountains North Area Plan. The NPS values the County's R&R zoning because it helps the public to enjoy the region's 500-mile public trail network, several unique parks, public beaches, and the rural scenic setting offered by SMMNRA. Specifically, the NPS concurs with the North Area Plan's encouragement of new and existing recreational facilities (equestrian rentals, low-intensity campgrounds, and conference facilities) that depend on the rural setting and mountain areas, are consistent with environmental protection policies, and are compatible with surrounding land uses (Policy No. IV-52, October 24, 2000).

While the NPS believes that continued use of the site as a recreation facility would be most compatible with adjacent park lands, we recognize the County allows for the proposed rehabilitation facility in the R&R zoning. If the County were to approve this project, we would encourage the operator to offer its clients programs such as trail outings and visits to parks in the Santa Monica Mountains. These types of outings have been demonstrated to enhance well-being and would serve the R&R zone's purpose of supporting public enjoyment of the outdoors.

Biological Resources - Rodent Control

The NPS recommends that project conditions prohibit the use of anti-coagulant rodenticides. Anti-coagulant rodenticides have been demonstrated to be extremely harmful to mountain lions and bobcats, who often feed on prey that has been poisoned by the compounds. Within the SMMNRA, ingestion of anti-coagulant rodenticides has contributed directly to the death of two mountain lions. Anti-coagulant rodenticides are also associated with fatal or near-fatal notoedric mange in bobcats. To prevent inadvertent poisoning of bobcats and other wildlife, we suggest using other types of rodent control, such as rodent-proofing buildings and food storage areas and using wooden snap traps or rat-zappers.

Cultural Resources - Archaeology

The NPS is the keeper of the National Register of Historic Places, including archeological sites. NPS recommends monitoring any and all ground disturbance for archaeological resources. While the Initial Study indicated that the project would involve no new excavation, the project description discusses excavation and installation of three new fire hydrants and their connection to the water main. We understand these developments are proposed within previously disturbed areas. However, the Santa Monica Mountains contain one of the densest collections of archeological sites in the United States. Archeological sites have been documented in the Triunfo Creek floodplain. While the risk of discovering archeological resources in situ in disturbed areas is usually low, the prevalence of these resources in the Santa Monica Mountains warrants additional precautions.

Public Trail Opportunities - Zuma Ridge Trail Connector to Westlake Village

The Zuma Ridge Trail, also known as the South Ladyface Trail, is a critical future connector between Westlake Village at the MRCA-owned Pentachaeta Trailhead and the SMMNRA trail network. The Initial Study states that the Zuma Ridge Trail passes north of the property (Santa Monica Mountains North Area Plan, Map 4). This information is only partially correct. The Zuma Ridge Trail alignment is a proposed route. The actual route will depend upon many factors, including terrain, an environmental analysis, property ownership and easements.

The existing Pentachaeta Trail constitutes a portion of the trail connection and terminates at two places along Triunfo Canyon Road. One terminus is approximately 300 feet beyond the southwestern corner of the project property. The other terminus is 1,800 feet beyond the property (See attached map). We ask the County and the applicant to work with the County Department of Recreation and Parks, MRCA, and NPS to identify a possible trail alignment for the Zuma Ridge Trail. The County may also wish to consider this as a condition of the proposed project's CUP. NPS would be willing to provide assistance for trail design.

Oak Tree Protection

The project site is within an oak woodland. Heavy foot traffic damages oak woodlands by damaging the roots of existing trees and preventing young trees from establishing themselves. Death or decay in the oak woodland could eventually impact not only Triunfo Creek, but views from adjacent properties, including park lands. Evidence suggests that portions of the site have already been subjected to soil compaction. Given both the natural resource and the aesthetic value the oak woodland provides for the proposed rehabilitation facility, we recommend that County and the applicant explore protections, such as railing, attractive fencing or raised decks along formal paths.

Fire Hazard and Structural Safety

The NPS plays an important role in implementing the National Fire Plan's Wildland Urban Interface Community Fire Assistance program by assisting communities with development of Community Wildfire Protection Plans (CWPPs). The proposed project site is within the

identified community area of Cornell. NPS supports Los Angeles County's recommended "house-out" strategy for wildfire defense. The strategy emphasizes cleaning structures of vegetation and leaf litter build-up, using fire-resistant materials, and protecting soffits and other portals from ember entry. We support the County's application of its "house-out" strategy in any fuel modification plan for the project site. The NPS is available to assist the Cornell community with development of a CWPP.

Documentation of Use under the Previous CUP for Project Location

A CUP was issued in 1979 to permit a private recreational club with overnight accommodations for up to 100 families. Another CUP was granted in 1988 to extend the permit to February 21, 1999. The staff report notes an absence of permitting violations or complaints from the neighborhood as a measure that the level of authorized use and the terms and conditions of the previous CUPs were satisfactory.

It is unclear from the staff report whether the use of the site ever reached the level allowed for in the previous permit. If this information is available, it would be helpful, as it would provide a more accurate assessment of past use.

Thank you for the opportunity to comment. If you have questions, please call Melanie Beck, Outdoor Recreation Planner, at (805)370-2346.

Sincerely,



David Szymanski
Superintendent

cc: Joe Edmiston, Executive Director, Santa Monica Mountains Conservancy
Craig Sap, Superintendent, Angeles District, State Department of Parks and Recreation
Clark Stevens, District Manager, Resource Conservation District of the Santa Monica Mountains

Enclosure: Zuma Ridge Trail Proposed Connection to Westlake Village (Map, 01/09/2013)