



# 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)/Tract 132-64B

April 24, 2013

Los Angeles County Regional Planning Commission  
320 W. Temple St.  
Los Angeles, CA 90012

SMMC 4/29/13  
Agenda Item 12(i)  
Attachment

Dear Commissioners:

The National Park Service (NPS) has received notice of the Commission's hearing on May 1, 2013, for Modifications to Recorded Tract Map No. 38931. The modifications include dedicating Lot Nos. 8, 9, 10, 11, and 12 (originally recorded as single family residential lots) to permanent open space, eliminating the required construction of a debris basin within Lot 23 and any other debris basins and drainage improvements associated with Lots 8 through 12, and removing the condition to construct inverted shoulder paving on Piuma Road and Woodbluff Road.

The National Park Service appreciates the opportunity to comment on the proposed legislation. We provide 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.

The NPS welcomes the proposed tract map modifications that would provide permanent protection of the natural and visual resources that contribute to an enjoyable visitor experience on the Backbone Trail. In comment letters from 1980 and 1982, NPS voiced the need to provide for wildlife habitat connectivity, protection of the riparian habitat on the project property, and public trail access for the Backbone Trail. While the County's 1982 approval provided demarcated areas on Lots 9 and 10 intended to be left open for wildlife movement and for the Backbone Trail, the corridor was narrow. The required debris basin would have exacerbated habitat loss in a riparian area. The proposed modifications would expand the wildlife corridor, complete the Backbone Trail public right-of-way, and would permanently protect the riparian habitat at the debris basin site. These proposed modifications are consistent with NPS management goals and objectives for protection of native habitat and public recreational access in the Santa Monica Mountains National Recreation Area.

We wish to offer the following suggestions regarding the process for completing the Backbone Trail easement and conveying the open space lots to a public agency.

### Trail Easement - Multi-use Designation

The proposed tract map conditions listed in the County Parks and Recreation letter dated April 10, 2013, provides for "a twenty-foot (20') wide multi-use (hiking, mountain biking, and equestrian)

trail easement..." We suggest the County incorporate text to defer the use designation to the future recipient agency of the proposed easement for the following reasons.

- The Backbone Trail use designation from Malibu Canyon Road to Trippet Ranch in Topanga State Park, including the stretch in the vicinity of Tract Map No. 38931, is currently hiker-equestrian (see attached map). This portion of the trail runs almost entirely across Malibu Creek State Park and Topanga State Park. The trail through this area was originally constructed as a footpath. The trail is not designated for multiple use.
- NPS, State Parks, and SMMC/MRCA are embarking on the long-awaited SMMNRA Interagency Trail Management Plan EIS/EIR. The EIS/EIR will evaluate alternatives for a 20-year vision for the SMMNRA trail network. The EIS/EIR will address trail use designation, including use on the Backbone Trail. It would be helpful keep the use designation across Lot 10 open so the TMP partner agencies may consider all options of use designation for the Backbone Trail.

#### Open Space Lots

We understand the County Parks and Recreation's April 10, 2013, letter listed conditions for the trail easement and open space lots that were incorporated by reference in the list of tract map modification conditions. The letter includes conditioning for the typical steps required to record a public trail easement. In particular, there is the step to record a separate document for the trail offer-to-dedicate, per Step 1(e, f, g). For the open space lots, the letter only has a condition to put a label on the "Exhibit A" map indicating the land will be conveyed to one of the listed parkland management agencies. There are no follow-up steps for recording the offer-to-dedicate. We suggest steps for the conveyance of the open space lots should parallel the conveyance conditions for the trail easement dedication (Step 1(e, f, g)).

We wish to thank the County and the applicant for taking the initiative to improve park resource protection associated with Tract Map No. 38931. Thank you for the opportunity to comment. If you have questions, please call Outdoor Recreation Planner Melanie Beck 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

Attachment: Map of Backbone Trail System – Current Trail Use Designation in Vicinity of Tract Map No. 38931, dated April 23, 2013

# Backbone Trail System - Current Trail Use Designation in Vicinity of Tract Map No. 38931

