

**SANTA MONICA MOUNTAINS CONSERVANCY**

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August 17, 2015

Mr. Steven Jones, AICP  
Principal Planner  
Department of Regional Planning  
320 West Temple Street, Room 1346  
Los Angeles, California 90012

**Comments on the Modification to Recorded Tract Map No. 468018-11  
Plum Canyon Project No. 85-628-(5)**

Dear Mr. Jones:

The Santa Monica Mountains Conservancy (Conservancy) offers the following comments on the Modification to Recorded Tract Map No. 46018-11 for the Plum Canyon project. The original, 1988 approval of the Plum Canyon project required the developer to provide a park for this master planned community. Much of Plum Canyon has been built and is occupied. Development of the Plum Canyon Master Tract is nearing completion, yet the developer has failed to provide a community park and must shoehorn the community park in this final sub-tract map .

Park site development on Tract Map No. 468018-11 requires grading (onsite and offsite) and impacts 5.23-acres of coastal sage scrub. The Environmental Impact Report Addendum (Addendum) proposes the developer mitigate park development impacts to coastal sage scrub at a ratio of 1:1 on the remaining 64.41-acres of undeveloped coastal sage scrub within the Plum Canyon project boundary. However, of these 64.41-acres, 42 are earmarked as mitigation for previous development phases of Plum Canyon and cannot be used to offset mitigation for development of the park site. The developer therefore has available 22.41-acres of coastal sage scrub to mitigate the development of the park site. However it is unclear in the Addendum the location and extent of coastal sage scrub mitigation on the available 22.41-acres. The Addendum is deficient for lacking a site description or figure on where the park development mitigation will be fulfilled. CEQA mitigation needs to be adequately defined.

What assurances can the public attain that the 5.23-acres of coastal sage scrub will be mitigated as one continuous block rather than piecemealed throughout the available 22.41-acres? The Addendum is therefore deficient and can not be certified until the Addendum includes a figure demonstrating the location of the proposed mitigation. If the Plum

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Canyon project area does not support 5.23-acres of healthy continuous coastal sage scrub habitat then the Conservancy recommends the developer provide off-site coastal sage scrub mitigation at a ratio of 2:1. In any case, onsite or offsite open space must be dedicated to a public agency in fee or conservation easement to be adequately protected.

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

Sincerely,

LINDA PARKS  
Chairperson